



**POLICY  
DOCUMENT**

# Child Protection and Safeguarding Policy

<b>Document Owner:</b>	Trust Board
<b>Responsible Trust Committee:</b>	Trust Board
<b>Date Approved:</b>	Michaelmas Term 2020
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<b>APPROVED Signature (Trust Board):</b>	DATE ( )
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## 1. Important contacts

Responsibilities	Role / Name
Safeguarding across the Trust	<b>Trust Board</b> (via the Systems Leader for Safeguarding) <b>Richard Lane</b> (Nominated Trustee) <b>Mark Barrow</b> (Trust Leadership Team nominated person) <b>Shona Power</b> (Systems Leader for Safeguarding)
Safeguarding on each SET School site	Heads of School: <b>Heidi Philpott</b> (SET Beccles) <b>Lizzie Girling</b> (SET Saxmundham) <b>Pia Parker</b> (SET Ixworth) <b>Lucy Thompson</b> (SET Maidstone & SET Causton)
DSL on each School site/ Designated Person for Children in Care (CiC)	<b>Heidi Philpott</b> (SET Beccles) <b>Shona Power</b> (SET Saxmundham) <b>Henry Popham-Cooper</b> (SET Ixworth) <b>Helen Brunning</b> (SET Maidstone and SET Causton)
ADSL on each School site/ Designated Person for Children in Care (CiC)	<b>Beth Woods/ Donna White/ Caroline Clark</b> (SET Beccles) <b>Hayley Coles/ Laura Bevan/ Sam Hicks/ Lizzie Girling</b> (SET Saxmundham) <b>Paul Spurin/ Baz Hale/ Pia Parker</b> (SET Ixworth) <b>Lucy Thompson/ Jess Urey</b> (SET Maidstone and SET Causton)

All contact details for those with responsibility for safeguarding can be found on the Trust website at <http://www.seckfordeducation.org.uk/who-we-are/safeguarding/> and the School-specific contact details on each school's website:

- <https://www.becclesschool.org.uk/>
- <https://www.ixworthschool.org.uk/>
- <https://www.saxmundhamschool.org.uk/>
- <http://www.maidstoneandcaustonfed.co.uk/>

## 2. Aims

This policy outlines the Trust's position in respect of the safeguarding of children and young people across all its Schools and in all procedures. The Safeguarding Procedures Manual covers the day-to-day practice of staff, led by DSLs and ADSLs on each site. This policy and the Safeguarding Procedures Manual cover the Trust and all its schools and as such there is no need for each School to have its own policy or procedures manual.

The Trust aims to ensure that:

- appropriate action is taken in a timely manner to safeguard and promote children's welfare;
- All staff are aware of their statutory responsibilities with respect to safeguarding;
- Staff are properly trained in recognising and reporting safeguarding issues.

This policy has been developed with guidance from the Suffolk Safeguarding Partnership. <https://www.suffolkscb.org.uk/> (Working Together to Safeguard Children 2018 set in legislation that

the three safeguarding partners (Local Authority, Chief Officer of Police, and Clinical Commissioning Groups) must work together with relevant agencies to safeguard and protect the welfare of children in Suffolk).

### 3. Legislation and statutory guidance and other relevant policies

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2020) and Working Together to Safeguard Children (2018), Child Abuse concerns: guide for practitioners (2015), Coronavirus: safeguarding in schools, colleges and other providers (May 2020) and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the School;
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children;
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18;
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM;
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children;
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children;
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism;
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children;
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

and the following guidance, including policies:

- Anti-bullying Policy;  
Behaviour Policy;
- Combatting Extremism and Radicalisation Policy; Continuing Professional Development (CPD) Policy; Covid-19 Addendum;
- Data Protection Policy; Drugs Policy;
- Educational Visits and Trips Policy;  
Equalities Policy (Students);
- First Aid Policy;
- Health and Safety Policy;

- Managing Violence in Schools Policy;
- Mental Health and Behaviour in Schools Guidance; Safeguarding Procedures Manual;
- Safeguarding and remote education; Safer Working Practices Guidance;
- Sex and Relationships Education Policy; Recruitment Policy;
- Trustee and Board Member Handbook; Volunteer Policy;
- Whistleblowing Policy; Work Experience Policy;
- Work Experience Procedures Manual;
- 'What to do if you are worried a child is being abused' – Advice for practitioners – DfE;
- 'Teachers' Standards: Guidance for school leaders, school staff and governing bodies', DfE, 2013;
- Suffolk Local Safeguarding Children's Board documentation; SEND Code of Practice, June 2014;
- The Children and Families Act 2014;
- Serious Crime Bill 2015 (relating specifically to the reporting of cases of FGM); Ofsted guidance to inspectors on the inspection of safeguarding in schools; Suffolk County Council's "Procedures for the Management of Children and Young People Who Display Sexually Harmful Behaviour";
- Suffolk County Council's "Information Sharing Agreement between Suffolk County Council & Schools Reported Incidents of Domestic Violence and Abuse (DVA)";
- Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers.

#### 4. Explanation of terms used in the policy

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment;
- Preventing impairment of children's mental or physical health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- Taking action to enable all children to have the best outcomes.

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA);
- A clinical commissioning group for an area within the LA;
- The chief officer of police for a police area in the LA area.

**'Trust'** = Seckford Education Trust **'School(s)'**

= Schools within the Trust **'DSL'** = Designated

Safeguarding Lead

**'ADSL'** = Assistant Designated Safeguarding Lead

**'CiC'** = Children in Care

**'LADO'** = Local Authority Designated Officer

**'CEOP'** = Child Exploitation and Online Protection (a branch of the Police service dealing specifically with online child safeguarding)

**'DBS'** = Disclosure and Barring Service (DBS is an executive non-departmental public body of the Home Office and helps employers make safer recruitment decisions and prevent unsuitable people from working with vulnerable groups, including children. It replaces the Criminal Records Bureau (CRB) and Independent Safeguarding Authority (ISA))

**'Customer First'** is the Duty Team responsible for triaging safeguarding referrals to the appropriate service and providing advice to schools on procedures.

## 5. Equality and policy statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9);
- Are Young Carers;
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- Have English as an additional language;
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence;
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation;
- Are asylum seekers;
- Are at risk due to either their own or a family member's mental health needs;
- Are looked after or previously looked after;

The Trust is committed to providing the highest standard of education for all students based on equality of access and opportunity. Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- protecting children from maltreatment;
- preventing impairment of children's mental or physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care;
- and taking action to enable all children to have the best outcomes.

The Trust believes that all young people:

- have the right to be protected from harm and / or abuse;
- have the opportunity to develop fully;
- have their basic needs met.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. Trust and School staff are particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating. Schools and their staff form part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children 2018. Schools should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

Each SET School will have a designated safeguarding lead (DSL) who will provide support to staff members to carry out their safeguarding duties and who will liaise closely with other services such as children's social care.

The Teachers' Standards 2012 state that teachers, including Heads of School should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties. All Trust and School staff have a responsibility to provide a safe environment in which children can learn. The Trust will provide appropriate training to ensure that all staff are able to carry out the expectations of this policy.

The Trust and its schools fully recognise the responsibilities and the duty placed upon them to have arrangements to safeguard and promote the welfare of all students. Where a child is suffering significant harm, or is likely to do so, action should be taken to protect that child. Action should also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

The Trust recognises that abuse occurs to children of all ages, both sexes, different races and cultures, and occurs in all social classes. The Trust recognises that because of the day-to-day contact with students, staff in its schools are extremely well placed to observe outward signs of abuse.

This policy applies to all Trustees, Local Advisory Board Members, staff and other agencies or volunteers working in the Trust and its schools.

## 6. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and Trustees in the School and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

### 6.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct the role and identity of the designated safeguarding lead (DSL) and assistants, the behaviour policy, and the safeguarding response to children who go missing from education;

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment;

The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play;

What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals;

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation and (contextual) risks of abuse or exploitation in situations outside their families;

That mental health can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

**Section 13 and Appendix 4 of this policy outline in more detail how staff are supported to do this.**

### 6.2 The Designated Safeguarding Lead (DSL)

The DSL is a member of the Senior Leadership Team named at the top of this policy. The DSL takes lead responsibility for child protection and wider safeguarding.

When the DSL is absent, the Assistant DSLs will act as cover with the support of a Trust Head of School if required.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters;
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so;
- Contribute to the assessment of children;
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly;
- Help promote positive educational outcomes for children, including children with a social worker.
- To ensure that all safeguarding files that are received are read and that MyConcern is updated to reflect any open and current concerns and that paper files received are filed.
- The DSL will also keep the Head of School informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL are set out in their job description.

### **6.3 The Trust Board**

The Trust Board will approve this policy annually at each review, ensure it complies with the law and hold the Heads of School, via the Chief Operating Officer, to account for its implementation.

The Trust Board will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full Trust Board. This is always a different person from the DSL.

The Chief Operating Officer of the Seckford Education Trust will act as the 'case manager' in the event that an allegation of abuse is made against a Head of School, where appropriate (see appendix 3).

The CEO of the Seckford Education Trust will act as the 'case manager' in the event that an allegation of abuse is made against the Chief Operating Officer (Executive Head of School), where appropriate (see appendix 3).

All Trustees will read Keeping Children Safe in Education.

Section 13 has information on how Trustees are supported to fulfil their role.

### **6.4 The Head of School (Head of School)**

The Head of School is responsible for the implementation of this policy, including at a school level:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction;
- Communicating this policy to parents when their child joins the School and via the School website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training

and update this regularly;

- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3). This may be supported by an Assistant Head of School'
- Ensuring the relevant staffing ratios are met, where applicable;
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

## 7. Confidentiality

For the Trust approach to confidentiality please refer to the Data Protection Policy. The Trust will also ensure the following:

- Timely information sharing is essential to effective safeguarding;
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children;
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe;
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk;
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests;
- The Government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information;
- If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or Assistant);
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3.

## 8. Recognising abuse and taking action

Staff, volunteers and Trustees must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or assistant DSL)".

### 8.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or is likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly and then record on Myconcern immediately

You can also report abuse directly to your local council using the link on the website below.

<https://www.gov.uk/report-child-abuse-to-local-council>

## 8.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgment on it
- Log the concern on Myconcern immediately and this will be passed to the DSL electronically. (NB. M&C are currently operating a paper system until January 2021 when they will move to an electronic way of recording in line with the rest of the Trust.)
- The concern should be the words of the child or the person raising the concern. They should not include opinion of those taking and recording the concern.

## 8.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

#### **8.4 If you have concerns about a child (as opposed to believing a child is suffering or is likely to suffer from harm, or is in immediate danger)**

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL or ADSL is not available, this should not delay appropriate action being taken. Speak to a member of the Trust senior leadership team and/or take advice from local authority children's social care.

##### **Early help**

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the School will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

##### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/ADSL will make the referral.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

#### **8.5 If you have concerns about extremism**

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of the Trust's safeguarding approach.

- 8.5.1 Extremism** is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- 8.5.2 Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- 8.5.3 Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Trust senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil.

You can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- Think someone is in immediate danger;
- Think someone may be planning to travel to join an extremist group;
- See or hear something that may be terrorist-related.

## **8.6 Concerns about a staff member or volunteer**

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Head of School. If the concerns/allegations are about the Head of School, speak to the Chief Operating Officer of the Seckford Education Trust.

The Chief Operating Officer/ CEO of the Seckford Education Trust will then follow the procedures set out in Appendix 3, if appropriate.

Where appropriate, the School will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

## **8.7 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously. This includes:

- 8.7.1 bullying (including cyberbullying);
- 8.7.2 physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- 8.7.3 sexual violence and sexual harassment. Part five of this guidance sets out how schools and colleges should respond to reports of sexual violence and sexual harassment;
- 8.7.4 upskirting, which typically involves taking a picture under a person's clothing without

- them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- 8.7.5 sexting (also known as youth produced sexual imagery).

Most cases of pupils hurting other pupils will be dealt with under the Trust's Behaviour Policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence;
- Could put pupils in the School at risk;
- Is violent;
- Involves pupils being forced to use drugs or alcohol;
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).

If a pupil makes an allegation of abuse against another pupil:

- You must record the allegation and tell the DSL, but do not investigate it;
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence;
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys;
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;
- Ensuring pupils know they can talk to staff;
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

## 8.8 Sexting

The Trust approach to sexting is based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL;
- Delete the imagery or ask the pupil to delete it;
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility);
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers;
- Say or do anything to blame or shame any young people involved;
- You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s);
- If a referral needs to be made to the police and/or children's social care;
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed);
- What further information is required to decide on the best response;
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown);
- Whether immediate action should be taken to delete or remove images from devices or online services;
- Any relevant facts about the pupils involved which would influence risk assessment;
- If there is a need to contact another school, college, setting or individual;
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved);

The DSL will make an immediate referral to police and/or children's social care if:

- The incident involves an adult;
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent;
- The imagery involves sexual acts and any pupil in the imagery is under 13;
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)/

- If none of the above applies then the DSL, in consultation with the Head of School and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialing 101.

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

### **Curriculum coverage**

Pupils are taught in an age appropriate manner about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is;
- How it is most likely to be encountered;
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive;
- Issues of legality;
- The risk of damage to people's feelings and reputation.

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images;
- The receipt of such images.

## **9. Notifying Parents**

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

## 10. Pupils with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Pupils being more prone to peer group isolation than other pupils;
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.
- We offer extra pastoral support for pupils with SEN and disabilities this is arranged and supported by the SENDCo in each of the Trust Schools.

## 11. Complaints and Compliance

Any complaints about this policy from outside the Trust should be made in accordance with the Trust's Complaints Policy. Any other complaints should be brought to the attention of the Chair of the Trust Leadership Group in the first instance.

Complaints that are in the public interest and relate to suspected malpractice may be appropriate to raise under the Trust's Whistleblowing Policy.

The Trust will review this policy annually and ensure that practice across the Trust and all Schools is in line with this policy. Any review will take into account the most up-to-date legislation and statutory guidance.

The Trust has identified a range of Assurance Methodologies as tools by which compliance with policies can be tested. Those most relevant to this policy include:

- Internal audit through Systems Leadership process;
- External audit;
- Local Advisory Board Member visits;
- Random testing by line managers.

## 12. Record Keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. These will be held on MyConcern the electronic safeguarding system used which can be accessed by all staff for reporting incidents but only DSLs can see concerns and act on these. *(NB Maidstone and Causton Junior school will move to this electronic system in January 2021. In the meantime they will follow a paper reporting system with completed forms being passed to the DSL.)*

Where students have historically held a paper file with any SET school or a paper file has come with them on arrival from another school as part of Year 7 transition or an In Year application these files will be held in a locked safeguarding cabinet. On receipt of these files into school DSL's or ADSL's will read the file and update the student on my concern so that they become live and open if they've arrived as an open case. This will reflect the most up to date concerns from the paper file onto the electronic system of MyConcern.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the School.

If a child for whom the School has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks;
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## 13. Training

### 13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the School's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### **13.2 The DSL**

The DSL and ADSL will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **13.3 Trustees and Local Advisory Board**

All Trustees and LAB members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

As the CEO of Seckford Education Trust may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head of School, they receive training in managing allegations for this purpose.

### **13.4 Recruitment – interview panels**

At least one person conducting any interview for a post at the School will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

### **13.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

**The following Appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.**

## Appendix 1: Types of Abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

**Physical abuse** may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.

**Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person;
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate;
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction;
- Seeing or hearing the ill-treatment of another;
- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing;
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet);
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment);

- Protect a child from physical and emotional harm or danger;
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment;
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

## Appendix 2: Safer recruitment and DBS checks - policy and procedures

We will record all information on the checks carried out in the School's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

### **New staff**

When appointing new staff, we will:

- Verify their identity;
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months;
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- Verify their mental and physical fitness to carry out their work responsibilities;
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- Verify their professional qualifications, as appropriate;
- Ensure they are not subject to a prohibition order if they are employed to be a teacher;

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent;

Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where

that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

## **Existing staff**

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

## **Agency and third-party staff**

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

## **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the School has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity;
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children;
- We will obtain the DBS check for self-employed contractors;
- We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the School.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity;
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity;
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment;
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trustees**

All Trustees will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

**The Chair of the Trust Board will have their DBS check countersigned by the secretary of state.**

All proprietors, Trustees, local governors and members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#);
- Identity;
- Right to work in the UK;
- Other checks deemed necessary if they have lived or worked outside the UK.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the School makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the School is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 3: Allegations of Abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including supply teachers or volunteer has:

- Behaved in a way that has harmed a child, or may have harmed a child; or Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children; or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children.

It applies regardless of whether the alleged abuse took place in the School (transferrable risk). Allegations against a teacher who is no longer teaching and historical allegations of abuse and non-recent abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. It should be noted that this will still be the case for any historic allegations which are made.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### Suspension

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the School so that the individual does not have direct contact with the child or children concerned;
- Providing an assistant to be present when the individual has contact with children;
- Redeploying the individual to alternative work in the School so that they do not have unsupervised access to children;
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted;
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school within the Trust.

### Definitions for outcomes of allegation investigations:

**Substantiated:** there is sufficient evidence to prove the allegation;

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive;

**False:** there is sufficient evidence to disprove the allegation;

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence);

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the Head of School (Chief Executive Officer of the Seckford Education Trust where the Head of School is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police);
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies;
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the School is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate;
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the School and their contact details;
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation;
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate;
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate;
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services

and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice;

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence);
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child;
- In the case of Early Years we will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

If the School is made aware that the Secretary of State has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

### **Timescales**

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week;
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days;
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### **Specific actions:**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the School ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the School's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the School.

### **Unsubstantiated or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Head of School, or other appropriate person in the case of an allegation against the Head of School, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

### **Confidentiality**

The School will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared;
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality;
- What, if any, information can be reasonably given to the wider community to reduce speculation;
- How to manage press interest if, and when, it arises.

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation;
- Details of how the allegation was followed up and resolved;
- Notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the School will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations

have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the Trust School procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff;
- The duration of the suspension;
- Whether or not the suspension was justified;
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children missing from education**

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect;
- Are at risk of forced marriage or FGM;
- Come from Gypsy, Roma, or Traveller families; Come from the families of service personnel; Go missing or run away from home or care; Are supervised by the youth justice system; Cease to attend a school;
- Come from new migrant families.

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the School without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

## **Children who need a social worker**

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## **Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. It may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex.

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions;
- Associating with other young people involved in exploitation; Having older boyfriends or girlfriends;
- Suffering from sexually transmitted infections or becoming pregnant; Displaying inappropriate sexualised behaviour;
- Suffering from changes in emotional wellbeing; Misusing drugs and/or alcohol;
- Going missing for periods of time, or regularly coming home late; Regularly missing school or education, or not taking part in education.

## **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL/ ADSL will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### **So-called 'honour-based' violence (including FGM and forced marriage)**

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### **FGM**

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place;
- A mother/family member disclosing that FGM has been carried out;
- A family/pupil already being known to social services in relation to other safeguarding issues;
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable;
  - Finding it hard to sit still for long periods of time (where this was not a problem previously);
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating;
  - Having frequent urinary, menstrual or stomach problems;
  - Avoiding physical exercise or missing PE;
  - Being repeatedly absent from school, or absent for a prolonged period;
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour;
  - Being reluctant to undergo any medical examinations;
  - Asking for help, but not being explicit about the problem;
  - Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practicing FGM (this is the biggest risk factor to consider);
- FGM being known to be practiced in the girl's community or country of origin;
- A parent or family member expressing concern that FGM may be carried out;
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues;
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM;
  - Having limited level of integration within UK society;
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman";
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period;
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM;
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion);
  - Being unexpectedly absent from school;
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.
  - The above indicators and risk factors are not intended to be exhaustive.

## **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage.

Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place;
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer;
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fm@fco.gov.uk](mailto:fm@fco.gov.uk);

- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

## **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- Becoming susceptible to conspiracy theories and feelings of persecution Changes in friendship groups and appearance
- Rejecting activities they used to enjoy Converting to a new religion
- Isolating themselves from family and friends Talking as if from a scripted speech
- An unwillingness or inability to discuss their views
- A sudden disrespectful attitude towards others Increased levels of anger
- Increased secretiveness, especially around internet use
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- Accessing extremist material online, including on Facebook or Twitter Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Further information on the School's measures to prevent radicalisation are set out in other school policies and procedures.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the School who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or

The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the School any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- Make attempts to contact parent/carer
- Contact any emergency contact held on the child's file
- Contact Customer First

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact the parent/carer to inform
- If unable to contact parent/carer call the police to report the child as missing

### **Child criminal exploitation: County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of County Lines criminal activity, drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

As with child sexual exploitation, children often don't see themselves as victims or realise they have been groomed to get involved in criminality. So it's important that we contact the local police by dialling 101, or in an emergency 999, or use the National Referral Mechanism 102. Like other forms of abuse and exploitation, County Lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **Children and online safety away from school and college**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection

Policy and where appropriate referrals should still be made to children's social care and as required, the police by the DSL or ADSL within the school setting.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

Online teaching should follow the same principles as set out in the Trust's code of conduct. Seckford Education Trust will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements. Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- No 1:1s, groups only
- Staff and children must wear suitable clothing, as should anyone else in the household. • Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms provided by Seckford Education Trust to communicate with pupils
- Staff should record, the length, time, date and attendance of any sessions held.

## **Identity Badges**

It is expected that every member of teaching staff wears an identity badge with their title, job role and photograph. This also applies to all support staff, save for cleaning staff and peripatetic staff.

The badge should be worn with a Trust lanyard.

The purpose of this expectation is so that any member of staff is clearly identifiable on site / trips etc. Having an identity badge clearly shows that staff members are legitimate and have been safeguarding trained (as that is an expectation of all members of staff).

Heads of School are expected to make sure their staff are wearing their badge at all times when on Trust / School business. Though, it should be noted that Heads of School and staff are expected to use their common sense with this expectation.

Sometimes a lanyard and badge should be removed for health and safety purposes or for instances such as school photographs. It is also advisable to remove your badge when leaving school for the day.

Staff are expected to report any loss of their identity badge to their Head of School as a matter of urgency. This will not only need to be replaced, but Reception staff alerted that someone else may attempt to use the lost badge to get on site.