



# Safeguarding Policy

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## 1. Introduction

The purpose of this policy is to assist all staff, academy council members and the Trust Board to protect and safeguard all children. School staff are particularly important as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.

This policy should be read in conjunction with the following DFE, Ofsted Policies and Safeguarding Partnership (LSCB) procedures:

- Working together to Safeguard children (2018)
- Keeping Children Safe in Education (Sept 2023)
- Teaching online Safety in Schools (June 2019)
- Inspecting safeguarding in early years, education and skills settings (updated Oct 2018)
- Governance handbook (Jan 2017)
- Disqualification by association (Updated September 2018)
- Information Sharing: Advice for practitioners providing safeguarding services GDPR guidelines 2018
- What to do if you think a child is being abused (2015)
- 'Prevent Duty' as outlined in the Counter Terrorism and Security Act (2015), and
- Bexley Safeguarding Partnership for Children and Young People (BSCB) reporting procedures. [http://www.bexleylscb.org.uk/page.php?section=section\\_0&id=276](http://www.bexleylscb.org.uk/page.php?section=section_0&id=276)

The Children Act 1989 defines a child as being up to the age of 18 years; it also defines significant harm and the roles and responsibilities of Children's Social Care and the Police.

Hope Community School recognises its legal duty under s.175 Education Act 2002 to work with other agencies in safeguarding children and protecting them from "significant harm". KCSIE 2023 recognises that safeguarding and promoting welfare of children is defined as

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

The protection of children is of the highest priority for our school. Children have a right to feel secure and cannot learn effectively unless they do so. At Hope Community School we have a commitment to safeguard all our children and staff. We feel it is important to regularly give messages about how to keep ourselves safe.

All children regardless of age, gender, ethnicity, ability, sexuality, religion, culture, language and beliefs have a right to be protected from harm. All staff have a key role in prevention of harm and an

equal responsibility to act on any suspicion or disclosure that may indicate a child is at risk of harm in accordance with the guidance.

Any child may benefit from early help assessment, but all school staff should be particularly alert to the potential need for early help assessment or those that are potentially at greater risk of harm, online or offline, for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of honour-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education or have become a child missing from education;
- has or needs a social worker.

We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working throughout the child protection process to safeguard children.

Everyone who comes into contact with children and their families has a role to play in safeguarding children. 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. School staff form part of the wider safeguarding system for children. This system is described in statutory guidance *Working Together to Safeguard Children 2018*.

Our staff seek to adopt an open and accepting attitude towards children and young people as part of their general responsibility for pastoral care and is integral to Hope Community School's ethos. Parents, carers and children are free to talk about any concerns or worries which may affect educational progress and that they see the school as a safe place if there are ever any difficulties at home. Children are always taken seriously if they seek help from a member of staff.

It is every adult's responsibility to remain vigilant and all suspicions or complaints of abuse must be reported to the Designated Safeguarding Lead (DSL), or if the complaint involves the Designated teacher, to the Designated Academy Council Member.

The role of the Designated Safeguarding Lead is one of vital importance in a school. Due to the responsibilities and significance of safeguarding responsibilities, this role is undertaken by a member of the senior leadership team.

### **1.1 Roles and Responsibilities**

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and school council members in the school. This policy and procedures also apply to extended school and off-site activities.

#### **All staff**

All staff will read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

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 deputies, the behaviour policy, and the safeguarding response to children who go missing from education. All staff will be aware of the safeguarding response to children who are absent from education (either for those that have prolonged periods of absence and also for those not on a school roll)
- The early help process 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-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The need for professional curiosity and to raise concerns with the DSL. Not all children may feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff must be mindful in determining the best way to build up trusted relationships with pupils which facilitates communication.

## The DSL

The DSL will ensure that:

- They liaise with and manage all referrals to relevant agencies such as Family Services and Social Work (FSSW), and the LADO
- The Principal, the Trust Board and the Local School Council are kept informed of on-going safeguarding and child protection inquiries
- They provide advice and guidance for staff on safeguarding and child protection issues
- Bexley's Safeguarding Children Board policies and are reviewed annually
- All staff, including temporary staff, are aware of and understand the policies and procedures and are able to implement them
- They attend regular training and network meetings run by Bexley's safeguarding board and delegated trainers to keep up to date with emerging policies and issues
- They are aware of children in need, young carers and children who have special educational needs and keep staff up to date with developments and information
- Child protection systems within the school, including the management of records and standards of recording are overseen
- they have a good understanding of the filtering and monitoring systems and processes in place at our school
- They provide the link between the school and other relevant safeguarding agencies including the Virtual School for Looked After Children
- All staff, including temporary staff, receive appropriate safeguarding training every year
- There is refresher training for Staff INSET throughout the year
- Parents are aware of policies and procedures and that they are kept informed and involved as appropriate
- Relevant records are passed on appropriately when children transfer to other schools or settings
- Ensures that checks and identification are received for any supply teachers that are used by the school
- All supply teachers are given a shortened copy of this policy to inform them of the procedures in school.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the

additional academic support and adjustments that they could make to best support these children.

### **The Principal will:**

Maintain responsible for the implementation of this policy, they will:

- Ensure that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensure that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicate this policy to parents/carers when their child joins the school and via the school website
- Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Support the DSL in developing knowledge and skills to encourage a culture of listening and reducing barriers to disclosure
- Ensure that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Communicate this policy to parents/carers via the school website
- Ensure that all staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively promptly following agreed whistleblowing policies, where appropriate

### **The School Council/Trustees**

The School Council will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Appoint a link council member to monitor the effectiveness of this policy in conjunction with the full governing board.
- The chair of the council will act as the 'case manager' in the event that an allegation of abuse is made against the Principal, where appropriate
- Read Keeping Children Safe in Education in its entirety annually.
- All receive appropriate safeguarding training at induction, followed by regular updates. This is in order to test and assure themselves that the safeguarding policies and procedures in place are effective and support robust whole school approach.
- Do all that they reasonably can to limit children's exposure to the risks from the school's or college's IT system and ensure the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.



The Trustees will:

- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Principal to account for its implementation

### **1.2 How we help keep children safe:**

- Ensuring all staff, trustees, academy council members and volunteers are aware of Safeguarding guidelines through policy, procedures and staff code of conduct
- Identify children who need extra help at an early stage and make appropriate referrals for an early help service to prevent concerns escalating
- Review and monitor our list of vulnerable pupils on a regular basis, especially those who receive early help assessment
- Sharing information about safeguarding and good practice
- Sharing information with relevant agencies and involving children and parents where appropriate
- Following the procedures to safely recruit staff, academy council members and volunteers
- Providing effective management for staff, academy council members and volunteers through support and training including online safety
- All staff will undertake 'Safeguarding A' training and have access to 'Child Abuse – Signs and Symptoms' documentation, including online safety (for example, via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Ensure that all children are in an environment where they feel safe and secure
- Ensure children know they can approach any adult in the school if they are worried
- Include opportunities for the development of the whole child through the planning of the SMSCD (Spiritual, Moral, Social and Cultural Development) Curriculum such that every child develops the skills they need to recognise and stay safe from harm and abuse.

### **1.3 How we promote Safeguarding in our curriculum**

When appropriate, safeguarding issues will be addressed within HCS curriculum. Where suitable, issues may be explored in assembly, as part of Relationships, Sex and Health Education (RSHE) and Citizenship Education, SMCS, ICT and online safety. Further details included in Hope Community School's Teaching and Learning Policy, RSHE and Health and Safety policy.

Opportunities for discussion as part of day to learning in an environment where they feel secure, safe and confident supports children to develop the confidence to question and explore making good / right choices. Drama and discussion activities explaining risks in different situations encourage reflection on attitudes, responses and behaviour. Role play

scenarios promote self-esteem whilst also highlighting the impact of personal decisions on others.

#### **1.4 How we train staff**

All staff have 'Safeguarding Level 1' training and understand individual responsibilities for safeguarding. Training in different areas of responsibilities and updates will take place annually, with clear understanding for staff of the DSL role. There is also a commitment to ensure all staff read Part One of Keeping Children Safe in Education 2023 and that mechanisms are in place to assist staff to understand and discharge their role and responsibilities. Arrangements for HCS safeguarding and safeguarding procedures are shared with temporary staff and volunteers.

The Designated Safeguarding Lead and Deputy Designated Safeguarding Leads will undergo annual training each year. This will either be formal training accessed from Bexley's Safeguarding Partnership (LSCB) every 2 years, followed up in other years with training taking the form of an annual update. The DSL's training will also include Child on Child Abuse; so-called Honour-based abuse; and understanding the additional safeguarding vulnerabilities of learners with SEN and disabilities, and how those barriers can be overcome.

The Chair of the Local Council, the designated Academy Council Member for Safeguarding and Child Protection and Local Authority appointed council member will undertake the Local Authority's governor safeguarding training at least once every three years.

All new members of staff will receive child protection training as indicated in above as part of their induction programme. Briefings and updates on child protection and safeguarding procedures (including the signs of abuse and procedures for reporting concerns and disclosures) will be provided on a regular basis, at least annually, but more frequently when necessary, to ensure that all members of staff are familiar with any changes to the school policy as they occur.

At least one member of every appointments panel will have gained accreditation through Safer Recruitment training. The school will ensure that there are always sufficient numbers of suitably trained staff or council members in post.

A central record of Safeguarding training is kept in the school office and monitored by the HCS Local Council.

## **2: Abuse**

Our policy outlines the action to be taken if it is suspected that a child may be abused, harmed or neglected. It is recognised that a child may be abused, harmed or neglected in a

family, institution or community setting by someone known to them or by a stranger. This may include someone in a position of trust.

## **2.1 How we define abuse**

There are four categories of abuse:

- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

This policy will also address the issue of Radicalisation and its prevention, Child Sexual Exploitation, Forced Marriage, Female Genital Mutilation, Honour Based abuse, Child on Child abuse and 'Upskirting'. We also recognise some children are more vulnerable to abuse, online and offline, than others and have covered issues such as Looked After Children, children who are missing from education, privately fostered children, children who run away, and disabled children.

Staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

## **2.2 Physical abuse**

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.

### **Possible signs of Physical Abuse**

Hitting, squeezing, biting or twisting a child's arms or legs can cause injuries like bruises, grazes, cuts or broken bones. Sometimes someone burns a child, perhaps by holding a part of the body against something very hot or by scalding. Poisoning a child, perhaps by giving them alcohol or drugs, is also physical abuse. Older children may seek to conceal such injuries by keeping their arms and legs covered or being reluctant to change for sport.

Responsible staff need to be especially concerned about:

- injuries which do not match the explanation given for them
- bruises in places where you would not normally expect to find them, in soft tissue, for example, rather than on the bony prominence
- bruises which have a distinctive shape or pattern, like handprints, grasp or finger marks or belt marks
- burns or scalds with clear outlines
- bite marks and bruises like love-bites
- bruising in or around the mouth.

## **2.3 Emotional Abuse**

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying, causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

### **Possible signs of Emotional Abuse**

This form of abuse may result in a child becoming withdrawn, nervous, and unhappy or lacking in confidence. It may result in a child being unable to make friends, perhaps because they behave aggressively or inappropriately towards other children. Emotional abuse may happen when a carer behaves in a persistently indifferent or hostile way towards a child, perhaps through bullying, rejecting, frightening, criticising or scapegoating the child. It may happen when a carer's behaviour is inconsistent so that the child never knows what reaction to expect. It may happen when carers are very possessive or over-protective. In severe cases, children may be subjected to cruel treatment and punishment, like being locked in cold, dark surroundings or being made to do endless, inappropriate household tasks. A child living with domestic violence is also suffering emotional harm.

Responsible staff should be especially concerned about a child who:

- is continually depressed and withdrawn
- runs away or who is frightened to go home
- is reluctant to attend school
- is persistently blamed for things that go wrong
- is made to carry out tasks inappropriate to their age
- is not allowed to do normal childhood activities
- displays excessive fear of their parents or carers
- is excessively clingy and tearful.

## **2.4 Sexual Abuse**

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. They may also include 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.

The key elements in any definition of sexual abuse are:

- the betrayal of trust and responsibility
- abuse of power for the purpose of the sexual gratification of the abuser.

### **Possible signs of sexual abuse**

The abuser may use different ways to persuade the child to cooperate such as bribery, threats or physical force. Sexual abuse can take different forms, from touching to intercourse, and often does not cause any outward signs of physical injury. It can happen to boys as well as girls and to children of any age, from birth to 18 years old. Sexual abuse can have long lasting effects. Some children who have been abused go on to abuse other children. Some find as they grow up that they are unable to have close relationships with other people. Others deliberately injure themselves because they feel so awful about themselves.

Be especially concerned about a child who:

- exhibits sexually explicit behaviour
- has inappropriate sexual knowledge for his or her age
- attempts suicide or self-inflicts injuries
- repeatedly runs away from home.

## **2.5 Neglect**

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 affect a foetus 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.

### **Possible signs of neglect**

Responsible staff should be especially concerned about a child who:

- is constantly hungry, greedy or stealing food
- has lingering illnesses which have not been treated
- is continually smelly, scruffy and dirty
- is often dressed in inadequate or unsuitable clothing for the weather conditions
- suffers repeated accidents, suggesting a lack of proper supervision
- is constantly tired

- does not respond when given attention or, on the other hand, craves attention and affection from any adult.

## **2.6 Child sexual exploitation (CSE) and child criminal exploitation (CCE)**

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

## **2.7 Mental Health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

## **3: Children with vulnerabilities**

HCS recognises that while all children have a right to be safe, some children may be more vulnerable to abuse online and offline, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

Some children are living in circumstances that may make them more vulnerable to abuse, online and offline, neglect or poor outcomes. Some may need help or intervention from CFSC or other agencies in order to overcome problems or keep them safe. The following has been

written to help school staff recognise those children. Training is updated each year to focus on these vulnerable groups and to refresh staff on what they need to look out for.

### **3.1 Children with disabilities**

When working with children with disabilities, we need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child;
- Not getting enough help with feeding leading to malnourishment;
- Poor toileting arrangements;
- Lack of stimulation;
- Unjustified and/or excessive use of restraint;
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries;
- Unwillingness to try to learn a child's means of communication;
- Ill-fitting equipment, for example callipers, sleep boards, inappropriate splinting;
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

HCS recognise that there are a broad range of other safeguarding issues as outlined in guidance highlighted in KCSIE 2023.

#### **For those children who may have need of Reasonable Force / Restraint**

In line with the guidance in KCSIE 2023 (para 163) HCS recognise that using reasonable force in response to risks presented by incidents involving children with SEN or disabilities or with medical conditions should be carefully considered due to the additional vulnerability of these groups. In accordance with our Behaviour Policy we proactively plan positive behaviour support for more vulnerable children and agree them with parents and carers to reduce the occurrence of challenging behaviour and the need to use reasonable force.

### **3.2 Children who are missing from education or home educated**

The school refers to Bexley's "Children missing from education" policy and Bexley's Missing, Exploited and Trafficked Children (MET) 2018-2020

[https://mybexley.firmstep.com/en/service/Children\\_missing\\_education](https://mybexley.firmstep.com/en/service/Children_missing_education)

Within Bexley, the acronym MET is used to identify all children who are missing; believed to be at risk of or being sexually exploited; or who are at risk of or are being trafficked. Given the close links between all of these issues, there has been a considered response to join all three issues so that cross over of risk is not missed.

The school is aware of those children who are persistently absent or missing from school as this may be an indicator of welfare concerns.

**DSLs and staff should consider:**

**Missing lessons:** Are there patterns in the lessons that are being missed? Is this more than avoidance of a subject or a teacher? Does the child remain on the school site or are they absent from the site?

- Is the child being sexually exploited during this time?
- Are they late because of a caring responsibility?
- Have they been directly or indirectly affected by substance misuse?
- Are other pupils routinely missing the same lessons, and does this raise other risks or concerns?
- Is the lesson being missed one that would cause bruising or injuries to become visible?

**Single missing days:** Is there a pattern in the day missed? Is it before or after the weekend suggesting the child is away from the area? Are there specific lessons or members of staff on these days? Is the parent informing the school of the absence on the day? Are missing days reported back to parents to confirm their awareness?

- Is the child being sexually exploited during this day?
- Do the parents appear to be aware?
- Are the pupil's peers making comments or suggestions as to where the pupil is at?

**Continuous missing days:** Has the school been able to make contact with the parent? Is medical evidence being provided? Are siblings attending school (either our or local schools)?

Our attendance policy clearly states who needs to be notified and what action should be taken and any relevant timescales. Local Safeguarding board's advice on missing children protocol which provides further details.

Where a parent notifies the school that they are removing the child so they can be educated at home, the following notifications are made:

- The Education Welfare Service is notified of all decisions
- A referral to Bexley's Missing Child Officer will be made and communication shared and updated as appropriate with any new information
- If the child is already known to Social Services, their allocated social worker is notified immediately
- If the child is not known to Social Services, but the school has concerns about their welfare or academic needs, the DSL will meet, where possible, with the receiving school with paper copies of our incidents, referrals, academic tracking and interventions to share with that school
- If the child is not known to social services and there are no concerns for welfare or academic needs the school will telephone the receiving school to share all information appropriate with them including past attainment and progress.



### **3.3 Children who runaway**

Running away is a dangerous activity that puts children at risk. Schools need to be aware of the Bexley guidance on missing children so that staff are clear of their role in helping to locate missing children and actions the school can take to help them reintegrate into school on their return.

If schools are worried about a child or young person who is thinking about running away, they can refer the young person to the Barnardo's project on 020 7700 2253 for support to help them to deal with issues and stop them running away.

Schools should also be aware that going missing is an indicator of other issues, such as child sexual exploitation, gang activity and trafficking.

### **3.4 Children at risk of Child Sexual Exploitation**

Child Sexual Exploitation (CSE) involves exploitive situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups.

What marks out exploitation is an imbalance of power in the relationship with their perpetrator always holding some kind of power over the victim which increases as the exploitive relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

At Hope Community School all staff, academy council members and volunteers are:

- aware of the guidance that is available in relation to CSE
- vigilant to the risk of it being practiced
- alert to the signs of potential or actual abuse

We take this abuse very seriously and will take timely and appropriate action in respect of any concerns about a child suspected to be at risk.

### **3.5 Privately Fostered Children**

A privately fostered child is a child or young person aged up to 16 who is cared for by someone who is not a parent or close family member such as a grandparent, aunt, uncle or sibling, and where the care arrangement will last more than 28 days.

Private fostering is a private arrangement between parents and the carer and normally happens where parents are working or studying away or a child is sent to the UK to live with family friends or distant relatives.

In general, privately fostered children are well cared for but some arrangements may be a cover for trafficking. All private fostering arrangements must be notified to the local authority and Bexley has a duty to visit a privately fostered child in order to safeguard their welfare.

Schools have a legal duty to notify the local authority of any pupil they know to be privately fostered. Schools should contact the Fostering team.

### **3.6 Children Living with Domestic Violence and abuse**

Domestic violence and abuse is extremely high in Bexley but often goes unreported or charges are dropped. Children living with parents who are experiencing domestic violence abuse also need support. 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.

Domestic abuse can be psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.”

Concerns should be raised with designated lead in first instance. A decision will be made whether it is appropriate to approach the parent and by whom and how support can be offered without putting the parent / carer at risk. The school will work closely with all agencies and will put in practice any actions that are shared with the family to support them where appropriate. Referrals made need to be made to MASH or Police, this will be the designated officer’s decision.

#### **The Trigger Trio**

The term ‘Trigger Trio’ has been used to describe the issues of domestic violence, mental ill-health and substance misuse which have been identified as common features of families where harm to partners and children has occurred. They are viewed as indicators of increased risk of harm to children and young people.

Research indicates that living within a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, wellbeing and understanding of what a normal relationship is. Harm can include ill treatment that is not physical. Children witnessing domestic abuse is recognised as ‘significant harm’ in law. These children may

become aggressive; display anti-social behaviours; suffer from depression or anxiety; or fail to reach their educational potential.

This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others

**Indicators that a child is living within a relationship with domestic abuse include:**

- withdrawn • suddenly behaves differently, anxious, clingy • aggressive • problems sleeping
- eating disorders • wets the bed • soils clothes • takes risks • misses school
- changes in eating habits • obsessive behaviour • nightmares • drugs • alcohol
- self-harm • depressed, thoughts about suicide

**For children the impact of parental mental health can include:**

- The parent / carer's needs or illnesses taking precedence over the child's needs
- Child's physical and emotional needs neglected
- A child acting as a young carer for a parent or a sibling
- Child having restricted social and recreational activities
- Child finds it difficult to concentrate- impacting on educational achievement
- A child missing school regularly as (s)he is being kept home as a companion for a parent / carer
- Adopt paranoid or suspicious behaviour as they believe their parent's delusions.
- Witnessing self-harming behaviour and suicide attempts (including attempts that involve the child)
- Obsessional compulsive behaviours involving the child

**For children the impact of parental substance misuse can include:**

- Inadequate food, heat and clothing for children (family finances used to fund adult's dependency)
- Lack of engagement or interest from parents in their development, education or wellbeing
- Behavioural difficulties- inappropriate display of sexual and/or aggressive behaviour
- Bullying (including bullying taking place due to a child's poor physical appearance)
- Isolation – finding it hard to socialise, make friends or invite them home
- Tiredness or lack of concentration • Child talking of or bringing into school drugs or related paraphernalia
- Injuries /accidents (due to inadequate adult supervision)
- Taking on a caring role
- Continued poor academic performance including difficulties completing homework on time
- Poor attendance or late arrival

These behaviours themselves do not indicate that a child's parent is misusing substances but should be considered as indicators that this may be the case.

If staff become aware of any of the above indicators for domestic abuse, mental health or substance abuse which suggest a child is suffering the effects of their behaviour the information will be shared with the DSL to consider a referral to children's social care.

### **3.6 Children at risk of Forced Marriage**

Any young person who is being forced into a marriage that they do not consent to will be the victim of child abuse and should be protected. They are likely to be in conflict with their family and may have little trust of adults, especially those from their own community.

The family may have made plans to take the young person abroad for the marriage and once this has happened, it becomes more difficult for the authorities in the UK to intervene.

The Forced Marriage Unit of the Foreign and Commonwealth Office has issued guidance for agencies on what action to take when there is reasonable cause to believe a young person may be being forced into marriage. Where schools are concerned or aware that a young person is about to be taken out of the UK for the purposes of a forced marriage, they should notify Bexley MASH immediately.

The family should not be notified or approached in any way. Schools should remain aware of a family's plans to go overseas for a period of time, and also if an older sibling has been known to have been forced to marry. Forced marriage - <https://www.gov.uk/guidance/forced-marriage>

Concerns will be shared with designated Leader and information will be shared with MASH either through referral or anonymous request for advice.

### **3.7 Children at risk of Female Genital Mutilation**

Female genital mutilation (FGM) is a collective term for all procedures involving the partial or total removal of external female genitalia for cultural or other nontherapeutic reasons. The procedure is typically performed on girls aged between 4 and 13 years, but in some cases FGM is performed on new born infants or on young women before marriage or pregnancy. The age at which girls undergo FGM varies according to the community. FGM is illegal in the United Kingdom and carries a 14-year jail sentence. It is also illegal to take a child abroad to undergo FGM. FGM is considered child abuse in the UK and causes physical, psychological and sexual harm.

At Hope Community School, all staff, academy council members and volunteers are:

- aware of the guidance that is available in respect of FGM
- vigilant to the risk of it being practiced
- alert to the signs of potential or actual abuse
- alert to children who are about to be taken to countries where FGM is common.

We take this abuse very seriously and will take timely and appropriate action in respect of any concerns about a child suspected to be at risk or to have undergone FGM. Any act of FGM on a girl under 18 must be reported to the police.

Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers.

12 If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

### **3.8 Children at risk of Honour Based Abuse**

Honour based abuse is a violent crime or incident which may have been committed to protect or defend the honour of the family or community. Bexley has a very high number of HBV cases each year. It is often linked to family members or acquaintances who mistakenly believe someone has brought shame to their family or community by doing something that is not in keeping with the traditional beliefs of their culture. For example, honour based abuse might be committed against people who:

- become involved with a boyfriend or girlfriend from a different culture or religion
- want to get out of an arranged marriage
- want to get out of a forced marriage
- wear clothes or take part in activities that might not be considered traditional in their culture

Women and girls are the most common victims of honour based abuse however it can also affect men and boys. Crimes of 'honour' do not always include violence. Crimes committed in the name of 'honour' might include:

- domestic abuse
- threats of violence or abuse
- sexual or psychological abuse
- forced marriage
- being held against your will or taken somewhere you don't want to go
- assault

In cases relating to HBV concerns, discussion with the designated Leader is essential and advice from MASH will be sought as to how to proceed to be safeguard the child or adult involved.

### **3.9 Children at risk of Radicalisation**

#### **Our Christian Values**

Christian values run as a thread throughout the school and curriculum. We will create space for children and the school community to explore their own personal beliefs and faith in a safe place where they can ask the big questions of life. We will present a Christian view point

while allowing children the freedom to decide for themselves. We will ensure children of all faiths feel included and valued by being inclusive in teaching about other faiths and religions.

### **Radicalisation**

Hope Community School is fully committed to safeguarding and promoting the welfare of all its pupils. As a school we recognise that safeguarding against radicalisation is no different from safeguarding against any other vulnerability. At Hope Community School all staff are expected to uphold and promote the fundamental principles of British values, including democracy, the rule of law, individual liberty and mutual respect, and tolerance of those with different faiths and beliefs. In formulating this policy, the Trust Board have taken account of the guidance from the Department for Education (DfE) who has called for all public bodies to make explicit their preventative measures to minimise the threat of extremism in their setting.

### **Definitions and Indicators**

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind. Extremism is defined as the holding of extreme political or religious views. The Trust Board has a zero tolerance approach to extremist behaviour for all community members. We rely on our strong values to steer our work and ensure the pastoral care of our pupils protects them from exposure to negative influences. Furthermore, the positive promotion of our Christian values and emphasis on creativity, adventure and openness equips our pupils with the skills to reject violence in all its forms.

### **Aims and Principles**

All members of our school community need to be fully engaged in being vigilant about radicalisation; that they overcome professional disbelief that such issues will not happen here and ensure that we work alongside other professional bodies and agencies to ensure that our pupils are safe from harm.

The principle objectives of Hope Community School are that:

- Pupils are encouraged to adopt and live out our Christian Values. These complement the key “British Values” of tolerance, respect, understanding, compassion and harmonious living.
- Pupils are helped to understand the importance of democracy and freedom of speech, through the class circle times and our daily Collective.
- Pupils are taught how to keep themselves safe, in school and when using the internet.
- Pupils participate in local community events so that they appreciate and value their neighbours and friends who may be different from themselves.
- Pupil’s wellbeing, confidence and resilience is promoted through our planned curriculum and out of hours learning opportunities.

- Pupils are supported in making good choices from a very young age, so they understand the impact and consequences of their actions on others.
- We ensure Academy Council Members, teachers, teaching assistants and non-teaching staff demonstrate an understanding of what radicalisation and extremism are and why we need to be vigilant in school.

Members of the Local Council and SLT, including the DSL must have PREVENT training run by Bexley Safeguarding Children Partnership (SSCP). All staff must be updated by senior leaders and regular INSET provided.

### **3.10 Children at risk from Child on Child Abuse**

DfE guidance KCSIE (2023) says that “all staff can abuse other children (often referred to as Child on Child abuse). Procedures should be in place to minimising the risks of child-on- child abuse. Some allegations may be of such a serious nature that they may raise safeguarding concerns.

These allegations are most likely to include:

- abuse in intimate personal relationships between children;
- Causing someone to engage in sexual activity without their consent (for example, forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party)
- bullying (including cyberbullying)
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- emotional abuse
- sexual violence, abuse and sexual harassment
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)
- 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;
- sexting (sharing nudes and semi-nudes images and or videos)

It is also likely that incidents dealt with under this policy will involve older students and their behaviour towards younger students or those who are vulnerable.

Staff training will ensure that child to child abuse will be recorded and investigated as with any Safeguarding concerns. This will include consideration of the wishes of the victim, nature of the incident including whether a crime has been committed and harm caused, ages of the children, gendered nature, developmental stages of the children, power imbalance between the children, any previous incidents, on-going risks, other related issues or wider contexts.

These will be managed in 3 ways:

1. Monitored and managed internally
2. Early help assessment and intervention
3. Referral to MASH or the Police.

However, HCS will remain vigilant in ensuring any behaviour from pupils, which may seem abusive in their nature is dealt with appropriately.

At HCS we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other students. We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy.

### **Prevention**

As a school we will minimise the risk of allegations against other pupils by:

- Providing a developmentally appropriate RSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
- Having systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued
- Delivering targeted work on assertiveness and keeping safe to those pupils identified as being at risk
- Developing robust risk assessments & providing targeted work for pupils identified as being a potential risk to other pupils.

### **Allegations against other pupils which are safeguarding issues**

Occasionally, allegations may be made against students by others in the school, which are of a safeguarding nature. Safeguarding issues raised in this way may include physical abuse, emotional abuse, sexual abuse and sexual exploitation. It is likely that, to be considered a safeguarding allegation against a pupil, some of the following features will be found.

If the allegation

- Is made against an older pupil and refers to their behaviour towards a younger pupil or a more vulnerable pupil
- Is of a serious nature, possibly including a criminal offence
- Raises risk factors for other pupils in the school
- Indicates that other pupils may have been affected by this student
- Indicates that young people outside the school may be affected by this student

If a concern is raised that there is an allegation of a pupil abusing another pupil within the school, the 'dealing with allegations against pupils' guidance will be followed. This has been reviewed in line with the "Sexual violence and sexual harassment" guidance issued by the Government May 2018. <https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>



## **Examples of safeguarding issues against a student could include**

### **Physical Abuse**

- Violence, particularly pre-planned
- Forcing others to use drugs or alcohol

### **Emotional Abuse**

- Blackmail or extortion
- Threats and intimidation

### **Sexual Abuse**

- Indecent exposure, indecent touching or serious sexual assaults
- Forcing others to watch pornography or take part in sexting

**'Upskirting'** 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. It is now a criminal offence and may constitute sexual harassment.

**'Sexting'** often refers to the sharing of naked or 'nude' pictures or video through mobile phones and the internet. It also includes underwear shots, sexual poses and explicit text messaging. While sexting often takes place in a consensual relationship between two young people, the use of sexted images in revenge following a relationship breakdown is becoming more commonplace.

Sexting can also be used as a form of sexual exploitation and take place between strangers. As the average age of first smartphone or camera enabled tablet is 6 years old, sexting is an issue that requires awareness raising across all ages.

The school will use age appropriate educational material to raise awareness, to promote safety and deal with pressure. Parents should be aware that they can come to the school for advice.

### **Sexual Exploitation**

- Encouraging other children to engage in inappropriate sexual behaviour (For example - having an older boyfriend/girlfriend, associating with unknown adults or other sexually exploited children, staying out overnight)
- Photographing or videoing other children performing indecent acts

## **Procedure to manage an allegation by a pupil against another pupil**

- When an allegation is made by a pupil against another student, members of staff should consider whether the complaint raises a safeguarding concern. If there is a safeguarding concern the Designated Safeguarding Lead (DSL) should be informed.
- A factual record should be made of the allegation, but no attempt at this stage should be made to investigate the circumstances.

- The DSL should contact the children’s reception team (CRT) to discuss the case. The DSL will follow through the outcomes of the discussion and make a referral where appropriate.
- If the allegation indicates that a potential criminal offence has taken place, CRT will refer the case to the multi-agency agency safeguarding hub where the police will become involved.
- Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.
- The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both pupils’ files.
- It may be appropriate to exclude the pupil being complained about for a period of time according to the school’s behaviour policy and procedures.
- Where neither social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school’s usual disciplinary procedures.
- In situations where the school considers a safeguarding risk is present, a risk assessment should be prepared along with a preventative, supervision plan.
- The plan should be monitored and a date set for a follow-up evaluation with everyone concerned.

See further information in our referral section.

### **3.11 Sexual violence and sexual harassment between pupil in schools**

In HCS, all adults are expected to make it clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. This will be through the examples staff set as role models to our pupils as well as through RSHE and application of the behaviour policy and code of conduct.

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable

Adults are expected to:

- not tolerate or dismiss sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”;
- challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia and flicking bras and lifting up skirts.
- understand that all of the above can be driven by wider societal factors beyond the school and college, such as everyday sexist stereotypes and everyday sexist language. This is why a whole school approach (especially preventative education) as described in KCSIE 2023.

- recognise that pupils with SEN are three times more likely to be abused and ensure they have awareness of pupil behaviours that may be inappropriate towards pupils with SEN
- recognise that allegations of sexual violence or sexual harassment are likely to be complex and will require difficult professional decisions to be made.

#### Responding to reports

The DSL must be notified without delay and decisions made on a case-by-case basis. As with other disclosures the person disclosing must be able to disclose the information in a supportive environment with clear record of factual information made as soon after the disclosure as possible.

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online should not be downplayed and should be treated seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.

Parents/carers will be informed unless there is a compelling reason not to, such as safety of the child. The police will advise what information can or should be shared.

There may need to be a temporary revision of education arrangements including class moves, arrangements for arriving and leaving school and at break times to ensure that both pupils are supported in continuing their education whilst any investigation is carried out.

Procedures in line with Keeping Safe in Education for Child on Child Sexual Violence and Sexual Harassment will be followed.

#### Action: following a report of sexual violence and/or sexual harassment

As always when concerned about the welfare of a child, all staff should act in the best interests of the child. Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

See KCSIE 2023 for full guidance

### **3.12 Managing reports**

Managing reports of a safeguarding incident is important, especially when staff are required to sensitively deal with difficult issues, whilst supporting a child or children

When managing reports:

- if possible, manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy).
- staff are not to promise confidentiality at this initial stage as it is very likely a concern will have to be shared further. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognise that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse;
- keep in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;
- listen carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;
- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present).
- only record the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;
- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS sexting in schools advice. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if not involved in the initial report.

The same procedures should be followed as set out in the child protection policy.

Where information includes an online element, staff including the DSL must be aware of the searching, screening and confiscation advice for schools and UKCCIS sexting advice for schools.

HCS also recognise the need to report and act on online safety concerns across all our policies including school behaviour policy and bullying policy to ensure pupils are just as clear about what is expected of them online as offline. Teaching Online Safety at School published by the

DfE is to be followed.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/811796/Teaching\\_online\\_safety\\_in\\_school.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf)

A risk assessment must be made following the disclosure by the DSL on a case-by-case basis, this may need to be amended once other agencies become involved. The DSL will report to children's social care through MASH, and this will be in conjunction with the police.

### **3.12 Serious Violence**

All staff should be aware of indicators that children could be at risk of serious violent crime and further information on how this will be managed is available from the Home Office on preventing youth violence and gang membership.

<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Risk factors that increase the likelihood of involvement in serious violence have been added:

- Being male
- Being frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending such as theft or robbery

### **3.13 Child criminal exploitation: county lines County Lines: Criminal Exploitation of children and vulnerable adults (Home Office Guidance)**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/741194/HOCountyLinesGuidanceSept2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf)

HCS recognise that 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. Bexley in particular has very real and current problems across areas of the city where children are at high risk.

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.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs, and a referral to the National Referral Mechanism should be considered.

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. Any person in our school who has concerns that may include criminal exploitation of a child should report their concern to the DSL without delay. The DSL will contact the multi-agency safeguarding hub for advice. (Annexe B 2023)

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

Children are sometime 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 with Young witness booklet for 5 to 11 year olds and 12-17 year olds. These explain each step of the process and 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. If this situation arises for a child at HCS we will work with the relevant agencies and families to ensure that the child feels supported through the process and after through assessment on a case by case basis. (Annexe B 2023)

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

National Information Centre on Children of Offenders: Approximately 200,000 children 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. If this occurs at HCS we will work together with the relevant agencies including NICCO to ensure that the child is

fully supported, and actions can be taken to aim to mitigate the circumstances ensuring that all communication and access to information is fully adhered to. (Annexe B KCSIE 2023)

<https://www.nicco.org.uk/directory-of-resources>

### **3.15 Homelessness**

As a school we recognise that being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The impact of losing a place of safety and security can affect a child's behaviour and attachments.

In line with the Homelessness Reduction Act 2017 this school will promote links into the Local Housing Authority for the parent or care giver in order to raise/progress concerns at the earliest opportunity.

During office hours Bexley Housing Advice team, specific to homelessness issues can contact us on telephone number 020 8303 7777.

We recognise that whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. (Annexe B KCSIE 2023)

#### **How we safeguard extended school and before and after school activities**

All activities taking place as part of our extended day, whether before or after core school hours, will follow our safeguarding procedures.

#### **How this policy is monitored and reviewed?**

The DSL meets with the designated council member once a term to discuss the effectiveness of the policy and procedures, this is then reported to the local council.

### **4: Managing Concerns**

#### **4.1 How staff talk about and record safeguarding conversations with children**

Staff who observe injuries which appear to be non-accidental, or who are told anything significant by a child, **must** report their concerns to the DSL.

**School staff do not, however, carry out investigations, nor decide whether children have been abused. This is a matter for specialist agencies.**

If the concern is as a result of a conversation with a child the adult speaking with the child must:

- Listen carefully to the child and keep an open mind. Staff should not take a decision as to whether or not the abuse has taken place.
- Not ask leading questions, that is, a question which suggests its own answer ("Was

- it your Father?” or “Did this take place on Tuesday when you were away?”).
- Reassure the child but not give a guarantee of absolute confidentiality. The member of staff should explain that they need to pass the information to the DSL, who will ensure that the correct action is taken.
- Must keep a written record of the conversation which must be written within an hour of the disclosure.

The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. It should describe observable behaviour e.g. was shaking, continued to cry, constantly moved around the room and record the actual words spoken by the child wherever possible. The record should be signed by the person making it and should use names, not initials.

Staff should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision, whether this is when problems are first emerging, or where a child is already known to local authority children’s social care (such as on a child in need or child protection plan).

### **Childs Wishes**

Where there is a safeguarding concern at this school all leaders ensure that the child’s wishes and feelings are taken into account when determining what action to take and what services to provide, contact or signpost too. Systems are in place for children to express their view and give feedback when talking with any DSL’s and these are always fed back to other agencies involved to operate with the best interests of the child at heart (KCSIE 2023 para 96)

Following our procedures these are recorded to ensure an accurate account of their views with any words and / or phrases used by the child. This is routinely followed up by our DSL.

Children are able to access DSL’s throughout the school day and know who the adults are.

At induction all staff receive training on the school’s internal procedures for keeping a confidential written record of any incidents and the expectations of recording requirements (e.g. local referral form or written report for case conference) of Bexley’s Safeguarding Partnership (LSCB).

**The record must be kept securely and handed to the DSL.**

In all cases Staff are **required** to discuss concerns with the school’s DSL. They will in turn liaise with the appointed academy council member and respond in line with the LCSB procedures. We regard all information relating to individual safeguarding issues as confidential, and staff will act accordingly.

Further information is available on request from the Principal. If staff are unsure how to proceed advice may be sought from the Local Authority, the Social Services Department or the Police.



## 4.2 How we involve other people and agencies

The School will respond to concerns in line with Safeguarding Partnership (The LCSB) policies. Our policy is to refer all matters of concern to the appropriate agency. If it is a matter of safeguarding a child it will be referred to Children's Services.

Whilst the school will work openly with parents as far as possible, the school reserves the right to contact Bexley's Multi-Agency Safeguarding Hub (in line with current safeguarding procedures) and Local Safeguarding Children's Board Child and Family Early Intervention Model and Threshold Document or the Police, without notifying parents if this is in the child's best interests.

<http://Bexleylscb.co.uk/wp-content/uploads/2012/10/Bexley-Child-and-Family-Early-Intervention-Model-and-Threshold-Document.pdf>

## 4.3 Referrals

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately. Referrals should follow the local referral process.

Safeguarding referrals should be made to Bexley Multi Agency Safeguarding Hub (MASH).

**Bexley MASH:** Telephone: **023 8083 3336** (Out of hours: **023 8023 3344**)

Email: [mash@Bexley.gov.uk](mailto:mash@Bexley.gov.uk)

The parent/carer will normally be contacted to obtain their consent before a referral is made. However, if the concern involves, for example alleged or suspected child sexual abuse, Honour Based abuse, fabricated or induced illness or the Designated Safeguarding Lead has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral, but a rationale for the decision to progress without consent should be provided with the referral.

In circumstances where a child has an unexplained or suspicious injury that requires urgent medical attention, the CP referral process should not delay the administration of first aid or emergency medical assistance.

**If a pupil is thought to be at immediate risk because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child during the school day, for example, urgent Police intervention will be requested together with MASH referral.**

### **Reporting to the police**

Any report to the police will generally be in parallel with a referral to children's social care

See KCSIE 2023.

Where a child sustains a physical injury or is distressed as a result of reported chastisement, or alleges that they have been chastised by the use of an implement or substance, this will immediately be reported for investigation.

All parents applying for places at this school will be informed of our safeguarding responsibilities and the existence of this policy. In situations where pupils sustain injury or are otherwise affected by an accident or incident whilst they are the responsibility of the school, parents will be notified of this as soon as possible.

Hope Community School recognises the need to be alert to the risks posed by strangers or others (including the parents or carers of other pupils) who may wish to harm children in school or pupils travelling to and from school and will take all reasonable steps to lessen such risks.

**Early Help Assessment:** Referrals for Early help will be made using the Universal Help Assessment document for those children and their families that request or need additional support from the Early Help Assessment team to manage situations at home. (<http://Bexleyscb.co.uk/universal-help-assessment-forms/>)

These referrals will be written, where possible, jointly with the parents to ensure all information is correct and the area of help has been clearly identified.

**Children in need:** Referral for a social work service will be made by way of a referral to the MASH team for children who are likely to be assessed as being a child in need under section 17 of the Children Act 1989.

(<https://Bexley.firmstep.com/default.aspx/RenderForm/?F.Name=k445NX72fcA>)

These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.

**Child Protection referrals:** Referral for a social work service will be made by way of a referral to the MASH team for children who are likely to be assessed as being a child in need under section 47 of the Children Act 1989.

(<https://Bexley.firmstep.com/default.aspx/RenderForm/?F.Name=k445NX72fcA&HideToolbar=1>) <http://Bexleyscb.co.uk/worriedaboutachild/>

If the initial referral is made by telephone, the DSL will confirm the referral in writing to Children's Services within 24 hours using the Common Assessment Framework (CAF).

If no response or acknowledgment is received within three working days, the DSL will contact Children's Services again. The DSL will agree with the recipient of the referral what the child and parents will be told, by whom and when.

If a safeguarding referral is made to social services, they will determine the need for a case conference. Case Conferences may be held within eight working days of the decision; they offer the opportunity to share information and to work together to formulate a plan of action. Staff are expected to attend, participate and/or provide a written report in all case conferences and meetings held under the LA guidelines.

**In taking this action the DSL will be careful to:**

- ensure that the school will not investigate concerns but refer them to the Local Authority Designated Officer (LADO), Children's Services or Police
- respect the wishes of the complainant's parents, provided they have no interest which is in conflict with the pupil's best interests and that they are properly informed.

Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose.

- respect duties of confidentiality, so far as applicable.
- ensure that a child's interests are paramount.
- ensure that, if there is room for doubt as to whether a referral to Children's Services should be made, the DSL will consult the LADO, or other appropriate professionals on a no names basis without identifying the pupil. However, as soon as sufficient concern exists that a child may be at risk of significant harm, a referral will be made as soon as possible, within a maximum of 24 hours.

Hope Community School respects the need to share only relevant information with safeguarding professionals, along with the balance of confidentiality and the need to safeguard a child. You may request our Information Sharing Policy for further information.

#### **4.4 How we respond to allegations against pupils**

A pupil against whom an allegation of abuse has been made may be suspended from the School and the School's policy on behaviour, discipline and sanctions will apply.

The School will take advice from Children's Services or the Local Authority Designated Officer (LADO) as appropriate on such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved, including the pupil or pupils accused of abuse. If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of Children's Services or the LADO, parents are informed as soon as possible and that the pupil is supported during the interview by an appropriate adult to support, advise and assist the pupil. In the case of pupils whose parents are abroad, the pupil's Guardian will be requested to provide support to the pupil and to accommodate him/her if it is necessary to suspend him/her.

If a child is suspended from school as a result of an allegation of abuse, the Trust Board will be informed as soon as practicable.

#### **4.5 How we respond to concerns regarding staff or volunteers**

All allegations of abuse of children by those who work with children must be taken seriously. Allegations against any person who works with children, whether in a paid or unpaid capacity, cover a wide range of circumstances, and may arise from a number of sources (e.g. a report from a child, a concern raised by another adult in the organisation, or a complaint by a parent). It may also arise in the context of the member of staff and their life outside work or at home.

To reduce the risk of inappropriate or unprofessional behaviour towards children, all staff and volunteers must be aware of safer working practice and must be familiar with the Government document 'Guidance for Safer Working Practice for Adults who work with Children and Young People in Education Settings'.

Where there is an allegation about a supply teacher (see part 4), the KCSIE 2023 guidance says, 'Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. 'In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome' (paragraph 326). 'The school or college will usually take the lead [in any investigation] because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process.' (Paragraph 327)

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Principal as soon as possible. If the concerns/allegations are about the Principal, speak to the Chair of the Local Council. Please see Annex 6 for details on how to identify the difference between low level concerns and concerns that meet the threshold of harm.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Principal, report it directly to the local authority designated officer (LADO).

Phone: 02380915535

E-mail: [LADO@Bexley.gov.uk](mailto:LADO@Bexley.gov.uk)

The Principal shall, as soon as possible, following briefing from the LADO inform the subject of the concern. If concern is raised regarding the Principal, then the Chair of the Local Council will be contacted.

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

#### **4.6 Confidentiality and Information Sharing GDPR May 2018 Data Protection legislation 2018**

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The School has clear powers to share, hold and use information for these purposes. School and college staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

- All information obtained by school staff about a pupil and their family is confidential and can only be shared with other professionals and agencies with the family's consent, however in cases such as initial multi-agency strategy meetings; the DSL needs to record what was shared, with whom, when and why it was shared in the best interests of the child.
- If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged 16 and over are able to give their own consent.
- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with FSC and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by FSC.
- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this.
- Before taking this step, the school should consider the proportionality of the disclosure against non-disclosure; is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to refer need not be sought if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss with the MASH social worker to gain advice on whether this course of action should be taken.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to

whom and what will happen as a result. Parents should also be made aware of the school/college's duty to share information.

- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated leader or seek advice from the MASH.
- practitioners in a strategy discussion or the initial evaluation of the case should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim. 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.

### **Children's child protection records**

- Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate from the pupil's education records. These records will be securely held within the school.
- The designated leader is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on the safeguarding section of *Safeguarding* and all records will be dated as to the date and time of the incident
- Records should show: what the concerns were; what action was taken to refer on concerns or manage risk within the school; whether any follow-up action was taken; how and why decisions were made; how communication to home was achieved and by whom and when
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken.
- In event of an incident causing concern for the child's welfare, reports will be written by all staff involved and an investigation will take place with the children, if appropriate by the designated leaders.

### **Taking photos or images** <https://ico.org.uk/for-the-public/schools/photos>

- As a school we will seek consent from the parent of a pupil and from teachers and other adults before taking and publishing photographs or videos that contain images that are sufficiently detailed to identify the individual in school publications, printed media or on electronic publications. We will not seek consent for photos where you would not be able to identify the individual.
- We will seek consent for the period the pupil remains registered with us and, unless we have specific written permission we will remove photographs after a child (or teacher) appearing in them leaves the school or if consent is withdrawn.
- Photographs will only be taken on school owned equipment and stored on the school network. No images of pupils will be taken or stored on privately owned equipment by staff members.

## **4.7 Online Safety and use of Modern Technology**

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography to those who do not want to receive such content.

To address this, we aim to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and council members and trustees.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- Regularly update parents and carers about online safety and sites they may access away from school as part of independent study, and who they will interact with on these.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as child-to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

**Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will educate students about online safety as part of our curriculum.

For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras
- Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and councilmembers/trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

#### **4.8 Filtering and Monitoring**

All staff receive appropriate safeguarding and child protection training (including online safety) which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring at induction. The training is regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, termly updates, staff briefing notices, e-bulletins and during staff development days), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

The School Council receive safeguarding training and are aware of their responsibilities.

The roles of the local school council, trustees, the Safeguarding Council Member & Trustee, the DSL, the IT services and all staff are defined and monitored.



## The role of the School Council

### The School Council will

- Ensure the school has put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems
- Be alerted to any risks the school community faces
- Ensure there is ongoing effective review of the provision in the school
- Support the school in ensuring that the filtering and monitoring systems are robust

## The role of the Safeguarding Council Member

### The Safeguarding Council Member will

- Work with the School Council in ensuring the robust filtering and monitoring systems are in place
- Review the filtering and monitoring system with the DSL as part of the termly visits and feedback any issues to the governing body as required.

## The role of the IT services

### The IT service team will have technical responsibility for:

- Maintaining the filtering and monitoring systems
- Completing checks on the effectiveness of the filtering and monitoring system
- Providing filtering and monitoring reports on a termly basis. These may be discussed with the DSL and other relevant staff in order to ensure the whole community is protected.
- Keeping a record of sites that have been blocked and document the decision as to why
- Completing actions following concerns or checks in systems

## The role of the DSL

### The DSL will:

- Work with the Safeguarding Council Member and discuss any risks highlighted by the reports created by the IT provider
- Ensure all staff are trained in their role with regards to filtering and monitoring and know how to report any concerns. This will be at induction, as part of the annual safeguarding updates as well as ongoing and might be in the form of emails, bulletins or in staff briefings.
- Ensure alerts that are created by the school's filtering and monitoring system are responded to by a member of the safeguarding team in a timely way and review what actions are needed to ensure the school community are safe
- Review termly reports and discuss appropriate actions with the IT services team and also the DDSL or wider community
- Work with SLT to ensure that any risks inform the curriculum in RSE to ensure students are kept safe whilst in the community

The role of all staff

All staff should:

- Take part in annual training on their role with regard to filtering and monitoring
- Follow the procedures set out in the training by the school
- Report all concerns with regard to students or staff accessing inappropriate content to the DSL and IT services

The schools fully adhere to the filtering and monitoring standards in accordance with:

Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK ([www.gov.uk](http://www.gov.uk))

Filtering\_and\_Monitoring\_Standards\_ACH\_Grid\_June\_2023.xlsx Filtering and Monitoring ([safeguardingschools.co.uk](http://safeguardingschools.co.uk))

### **Mobile phones**

Each school's policy regarding mobile phones is clearly taught as part of the behaviour curriculum and found within the Behaviour policy – found on the school's website.

## **5: Staff**

### **5.1 How we recruit staff**

The School will comply with the guidance set out in Part 3, Safer recruitment, of KCSIE 2023. Although not a statutory requirement, at least one member of every appointments panel will have gained accreditation through Safer Recruitment training. Staff recruitment will be undertaken in accordance with current government guidance.

**Disqualification by Association** The school previously implemented the Childcare (Disqualification) Regulations 2009 by ensuring that staff who are disqualified by association because they live in the same household as a person disqualified under the Childcare Act 2006 are not able to work within the school. However, an update in Aug 2018 of the statutory guidance Disqualification under the Childcare Act 2006 removed disqualification of association for individuals working in child care in non-domestic settings e.g. Schools / Nurseries. Please see Appendix 2 for further information.

- All applicants will be vetted. This will include checking the personal details, qualifications, references, eligibility to work in the UK, medical fitness and a check against the barred list.
- The NCTL's Teacher Services system (previously known as the Employer Access Service) now provides restriction information about teachers from the European Economic Area (EEA), and these checks must be recorded for staff from these countries;

and

- The Prohibition from teaching check must be completed for everyone engaged in 'teaching work', whether a qualified teacher or not; and recorded on the Single Central Record.
- Contractors and volunteers will be required to have relevant checks in place where there is an opportunity for contact with children. Such requirements will form part of any contractual arrangements with third parties. Contractors to the school are asked to present evidence of DBS on arrival and we will also check that the person presenting at the school, is the same person that the agency has provided the vetting checks for.
- All academy council members will have enhanced DBS checks carried out as required under Keeping Children Safe in Education 2023.
- All applicants' criminal records will be checked through the DBS.
- The School will hold a single central record of employees and agency staff working at the School which sets out the checks undertaken and the relevant dates as a minimum.
- No member of staff will be appointed until all relevant checks have been completed.

## **5.2 Training**

See section 1.4.

## **5.3 Whistle blowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues.

Should a teacher have concerns regarding how safeguarding issues are being managed they can initially contact the Chair of the Local council – Billy Kennedy. They also have the right to contact the NSPCC Whistleblowing helpline number: 0800 028 0285 to discuss from 8am to 8pm Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk). For further information, please refer to our Whistleblowing Policy.

## Appendix 1: Bexley Safeguarding contacts and numbers:

<b>Early Years and Childcare Team Designated Safeguarding Lead:</b>	Liston Williams	0203 045 3436
<b>MASH Public Number:</b>		020 3045 5440
<b>MASH Opening Hours:</b>	Monday – Thursday Friday	8.30am – 5pm 8.30am – 4.30pm
<b>MASH Out of Hours Emergency Duty Team:</b>		020 8303 7777 020 8303 7171
<b>Early Years and Childcare Team:</b>		020 3045 4124
<b>LADO</b> Local Authority Designated Officer:	Email: <a href="mailto:LADO@bexley.gov.uk">LADO@bexley.gov.uk</a> <a href="mailto:childrens.triageteam@bexley.cjsm.net">childrens.triageteam@bexley.cjsm.net</a>	0203 045 3436 0203 045 5645 (Business Support)
<b>CSE Hub</b>	<a href="mailto:csehub@Bexley.gov.uk">csehub@Bexley.gov.uk</a>	
<b>Safeguarding Partnership</b>	Email: <a href="mailto:shield@bexley.gov.uk">shield@bexley.gov.uk</a> Web: <a href="https://bexleysafeguardingpartnership.co.uk/">https://bexleysafeguardingpartnership.co.uk/</a>	0203 045 4320
<b>Prevent</b> (Radicalisation, Terrorism prevention)	<a href="mailto:prevent.engagement@Bexley.pnn.police.uk">prevent.engagement@Bexley.pnn.police.uk</a>	Anti -Terrorism Hotline: 020 8303 7777 0800 011 3764
<b>Ambulance and Police Service:</b>		999
<b>Helplines</b>		
<b>NSPCC</b>		0808 800 5000
<b>Childline</b>		0800 1111
<b>FGM</b>		0800 028 3550
<b>Barnardo's</b>		01489 796684

## **Appendix 2: Briefing Sheet for Temporary and Supply Staff**

### **Briefing sheet for temporary and supply staff**

For supply staff and those on short contracts.

While working in Hope Community School, you have a duty of care towards the children/pupils here. This means that at all times you should act in a way that is consistent with their safety and welfare.

In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school Designated Safeguarding Lead (DSL), who is Sara Donnelly (Principal) or the Deputy DSL Emma Carvosso.

#### **This is not an exhaustive list, but you may have become concerned as a result of:**

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behaviour that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse.

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

#### **If a child talks to you about abuse, you should follow these guidelines:**

- Rather than directly questioning the child, just listen and be supportive. Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it, and mention anyone else who was present. Then sign it and give your record to the designated person/child protection officer, who should contact children's social care if appropriate.

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff. Remember, if you have a concern, discuss it with the DSL.

### **Appendix 3: Hope Community School Code of Conduct**

#### **Introduction**

As an employer, New Generation Schools Trust is required to set out a Code of Conduct for all employees.

Our school's core values are Adventure, Creativity, Openness and Excellence underpinned by a Christian ethos. It is expected all adults will demonstrate these values throughout each working day and reflect our "inclusive culture built on love and respect for all."

All communication and interaction between members of the school community - staff, children, parents, carers and visitors must reflect this ethos. Professionalism must be maintained at all times.

In addition, staff are required to develop and maintain the Christian character of the School. Staff are to have regard to the Christian ethos of the School and not do anything in any way detrimental or prejudicial to the interests of the same at any time, at work or at home.

All staff employed under Teachers' Terms and Conditions of Employment have a statutory obligation to adhere to the 'Teachers' Standards 2012' and in relation to this policy, Part 2 of the Teachers' Standards - Personal and Professional Conduct.

Staff should be aware that a failure to comply with the following Code of Conduct could result in disciplinary action, including dismissal.

#### **1. Purpose, Scope and Principles**

A Code of Conduct is designed to give clear guidance on the standards of behaviour all school staff are expected to observe, and the school should notify staff of this code and the expectations therein. School staff are in a unique position of influence and must adhere to behaviour that models the highest possible standards for all the children within the school. As a member of a school community, each employee has an individual responsibility to maintain their reputation and the reputation of the school, whether inside or outside working hours.

#### **2. Setting an example**

2.1 All staff who work at Hope set examples of behaviour and conduct which can be copied by our children. All staff must, therefore, demonstrate the highest standards of conduct in order to encourage our children to do the same.

2.2 All staff must also avoid putting themselves at risk of allegations of abusive or unprofessional conduct.

2.3 All staff must dress modestly for school – appropriate in length (ensuring that hem-line and neckline are not too revealing) casual sportswear, jeans and casual denim are not permitted during a normal school working day. Footwear must be similarly appropriate, for

example flip-flops or stiletto heeled shoes are not permitted due to possible injury. Tattoos must be covered as much as possible and body and facial piercings should be covered.

2.4 Staff should behave in a positive way despite any personal problems that they may have, especially in front of the children.

2.5 Smoking is not permitted anywhere on the school site. Staff must not attend work under the influence of alcohol or illegal drugs and will be removed from the school site if they do so.

2.6 Staff are expected to be punctual for work and within the school timetable. This is a contractual requirement but also respectful of others and demonstrates good personal organisation to the children.

### **3. Working practices**

3.1 All adults must work within the school's policies and practices, so that what happens is consistent with what has been agreed between all members of staff and the Local Council.

3.2 Staff should ensure that refreshments are taken at suitable points of the day, for example tea or coffee should be sought at break time or lunch time (if on duty, before or after break). Sealed containers should be used in class. They should not be carried around the school, for example into collective worship or on duty.

3.3 It is essential to ensure accurate logging in and out for every visit to the school using the inventory system to ensure the safety of all adults in the case of an evacuation of the site and to monitor good timekeeping, should it be required.

3.4 One of Hope Community School's unique elements is that of our dining arrangements. It is expected that staff eat lunch with the children at least once a week for part time staff and twice a week for full time staff, to demonstrate appropriate expectations and fulfil our vision of family dining.

### **4. Language and Communication**

4.1 All adults must use appropriate standard English at all times and never inappropriate or offensive language.

4.2 When adults speak to children they will:

- use a positive statement rather than a negative one so that children can learn what is expected of them in any situation.
- use a calm tone of voice at all times, to explain something to or instruct the children, so that they can follow our words without feeling threatened or uncomfortable.
- avoid using sarcastic words or phrases as these demean children and prevent them from developing high self-esteem.
- use positive language when dealing with behaviour and avoid the negative.  
Remember a child is not naughty but behaviour can be.

4.3 All adults in school should speak respectfully to other adults at all times, even if they disagree.

## **5. Safeguarding Children**

5.1 This document has been written in consultation with KCSIE 2023. Staff have a duty to safeguard children from:

- physical abuse
- sexual abuse
- emotional abuse
- neglect
- radicalisation and extremism
- child sexual exploitation (CSE) and Child criminal exploitation (CCE)

5.2 The duty to safeguard children includes the duty to report concerns about a child to the school's Designated Safeguarding Lead (DSL) for Child Protection.

5.3 The school's DSL is Sara Donnelly and our Deputies are Emma Carvosso and Jaqueline Anglin.

5.4 Staff are provided with personal copies of the school's Safeguarding Policy and Whistleblowing Procedure and must familiarise themselves with these documents. Copies of these are available from the staff room.

5.5 Staff must understand that EVERYONE has a responsibility for safeguarding.

5.6 Staff must not demean or undermine children, their parents or carers, or colleagues.

5.7 Staff must take the upmost care of children under their supervision with the aim of ensuring their safety and welfare.

5.8 Staff must keep themselves up to date with online safety issues and ensure that children are aware of "online" dangers through RSHE sessions, collective worship, mini-lessons before any activity requiring the use of the internet.

5.9 Staff must not use their mobile phone as a camera in school. Any photograph/video must be taken using school equipment. Staff must only save images on school equipment (See ICT Acceptable Use Policy).

5.9i Staff who are in contact with children should not use their mobile phones in front of children during their directed hours / paid hours of employment. Outside of these times, mobile phones should only be used in areas of the school where children are not present (see Staff Handbook).

## **6. Child Development**

6.1 Staff must comply with school policies and procedures that support the well-being and development of children.

6.2 Staff must co-operate and collaborate with colleagues and with external agencies where necessary to support the development of children.

6.3 Staff must follow reasonable instructions that support the development of children.

## **7. Honesty and Integrity**



7.1 Staff must maintain the highest standards of honesty and integrity in their work. This includes the handling and claiming of money and the use of school property and facilities.

7.2 All staff must comply with the Bribery Act 2010. A person may be guilty of an offence of bribery under this act if they offer, promise or give financial advantage or other advantage to someone; or if they request, agree or accept, or receive a bribe from another person. If you believe that a person has failed to comply with the Bribery Act, you should refer to the Whistleblowing procedure for schools.

7.3 Gifts from suppliers or associates of the school must be declared to the Principal, or to the Chair of the local school council, if the Principal is the recipient, with the exception of “one off” token gifts from students or parents. Personal gifts from individual members of staff to students are inappropriate and could be misinterpreted.

## **8. Conduct Outside Work**

8.1 Staff must not engage in conduct outside work which could seriously damage the reputation and standing of the school or the employee’s own reputation or the reputation of other members of the school community. Any such conduct could lead to dismissal. Please check your contract for further information.

8.2 In particular, criminal offences that involve violence or possession or use of illegal drugs or sexual misconduct are likely to be regarded as unacceptable and could lead to dismissal.

8.3 Staff must exercise caution when using information technology and be aware of the risks to themselves and others, e.g. staff must NEVER communicate with children using social media

8.4 Staff must not engage in inappropriate use of social network sites which may bring themselves, the school, school community or employer into disrepute.

8.5 Staff must only use their school email account or school learning platform account when communicating electronically with children, parents and colleagues.

8.6 During the appointment you shall not, except as a representative of the School or with the prior written approval of the Board of Directors or the Governing Body, provide any form of private tuition to any prospective, current or former pupil or parent of the School.

8.7 Staff shall not, except as a representative of the School or with the prior written approval of the Board of Directors or the Governing Body, be directly or indirectly engaged, concerned or have any financial interest in any capacity in any other business, trade, profession or occupation (or the setting up of any business, trade, profession or occupation) (See Contract of Employment).

8.8 Staff may undertake voluntary work outside school, provided that it does not conflict with the interests of the school and is not to a level which may contravene the working time regulations, bring the school, school community or employer into disrepute or affect an individual's work performance. (See Contract of Employment).

8.9 All members of staff must declare any business interests outside of school that may be connected either to the supply of goods / services to the school or be rewarded through association with the school.

## **9. Confidentiality**

9.1 Where staff have access to confidential information about children or their parents or carers, staff must not reveal such information except to those colleagues who have a professional role in relation to the child.

9.2 Where staff have access to confidential information about other staff members, staff must not reveal such information to any other person.

9.2 All staff are likely at some point to witness actions which need to be confidential. For example, where a child is bullied by another child (or by a member of staff), this needs to be reported and dealt with in accordance with the appropriate school procedure. It must not be discussed outside the school, including with the child's parent or carer, nor with colleagues in the school except with a senior member of staff with the appropriate role and authority to deal with the matter.

9.3 However, staff have an obligation to share with their manager or the school's Designated Safeguarding Lead any information which gives rise to concern about the safety or welfare of a child. Staff must never promise a child that they will not act on information that they are told by the child.

## **10. Disciplinary action**

10.1 All staff need to recognise that failure to meet these standards of behaviour and conduct may result in disciplinary action, including dismissal.

## **11. Interpersonal relationships**

11.1 All adults in the school should:

- avoid workplace gossip and negativity as it breeds resentment and becomes a roadblock to effective communication and collaboration. We all have a duty to take active steps to divert conversations away from this if we come across it.
- work at their relationships, resolving conflicts, being kind and supporting each other to model positive relationships to our children.
- work as part of a team, contributing as well as learning from others and helping to build up a strong workforce so that we can provide the best possible learning opportunities for the children.
- ensure appropriate relationships with parents, staff should at all times be friendly but professional.
- ensure professional and personal boundaries are secure. Within adult to adult relationships physical contact should be kept to a minimum, within child to adult relationships touch should be used appropriately and never in anger.
- treat everyone equally with respect.

PERSONAL AND PROFESSIONAL CONDUCT

**From Teachers' Standards 2012 (updated 2013) (DfE) - Appendix 1**

A teacher is expected to demonstrate consistently high standards of personal and professional conduct. The following statements define the behaviour and attitudes which set the required standard for conduct throughout a teacher's career.

- Teachers uphold public trust in the profession and maintain high standards of ethics and behaviour, within and outside school, by:
- treating children with dignity, building relationships rooted in mutual respect and at all times observing proper boundaries appropriate to a teacher's professional position
- having regard for the need to safeguard children's well-being, in accordance with statutory provisions
- showing tolerance of and respect for the rights of others
- not undermining fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs
- ensuring that personal beliefs are not expressed in ways which exploit children's vulnerability or might lead them to break the law.
- Teachers must have proper and professional regard for the ethos, policies and practices of the school in which they teach and maintain high standards in their own attendance and punctuality.
- Teachers must have an understanding of, and always act within, the statutory frameworks which set out their professional duties and responsibilities.

The full document can be read [here](#).

## **Appendix 4: Allegations of abuse made against staff**

### **Section 1: Allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the Principal, or the chair of the council where the Principal is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

## Suspension of the accused until the case is resolved

Suspension of the accused 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 there 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/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the multi-academy trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

## 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, or to cause harm to the subject of the allegation
- **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 case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- 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
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **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, for example trade union representative
- 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 (only in relation to their child – no information will be shared regarding the staff member)

- 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

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.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

## **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 school will 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 school will consider 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, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

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 LADO, 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.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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.

### **References**

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

### **Learning lessons**

After any cases where the allegations are *substantiated*, the case manager 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 school's 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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

### **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### **Responding to low-level concerns**

If the concern is raised via a third party, the Principal will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The Principal will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct]

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

### **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

**\*Please note that the current version of Keeping Children Safe in Education referenced in the diagram below is KCSiE 2023.**

