

WALFORD NURSERY & PRIMARY SCHOOL



POLICY FOR CHILD PROTECTION & SAFEGUARDING CHILDREN

Reviewed: November 2022

Date for review: November 2023

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School Acknowledgement

In this school, we are committed to safeguarding and child protection in line with the statutory guidance.

As required, all staff have read and understood part one of Keeping Children Safe in Education (KCSIE) 2022.

The Designated Safeguarding Lead (DSL) is **LOUISE GEORGE**.

The Deputy DSL is **EMMA HANHAM, HAYLEY NICHOLLS** and **CLAIRE WEYMAN**.

The Safeguarding Governor is **EMMA PARKES**.

The Prevent Single Point Of Contact (SPOC) is **LOUISE GEORGE**.

The Operation Encompass SPOC is **LOUISE GEORGE**.

The Designated Teacher for Children Looked After is **LOUISE GEORGE**.

The Designated Teacher for Children with a Social Worker is **LOUISE GEORGE**.

Local Multi Agency Safeguarding Arrangement

Note:

The Children and Social Work Act 2017 (the Act) replaced Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and **relevant agencies** they deem appropriate to work together for the purpose of safeguarding and promoting the welfare of children in their area. Education is one of the relevant agencies. In Herefordshire, the arrangements are referred to as the Herefordshire Safeguarding Children Partnership (HSCP).

Links with other policies

This safeguarding policy has obvious links with the wider safeguarding agenda: when agreeing or reviewing the policy links should be made with other relevant guidelines and procedures such as (but not limited to):

- Safer recruitment
- Physical restraint & restriction of liberty
- Code of conduct
- PSHE Education

- Visitor / external speakers
- Disqualification
- Online safety
- Social Networking
- Whistleblowing
- Health and Safety
- Children Missing Education
- Behaviour (including Anti-Bullying)
- Inclusion
- Code of behaviour / conduct
- Child on Child abuse

IMPORTANT CONTACTS

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL)	Louise George (Headteacher)	01989 562209 lgeorge@walford.hereford.sch.uk
Deputy DSL	Emma Hanham (Deputy Headteacher)	01989 562209 ehanham@walford.hereford.sch.uk
	Hayley Nicholls (Year 6 Teacher)	01989 562209 hnicholls@walford.hereford.sch.uk
	Claire Weyman (Year 1 Teacher)	01989 562209 cweyman@walford.hereford.sch.uk
Chair of Governors	Paul Deneen	01989 562209
Governor responsible for Child Protection and Safeguarding	Emma Parkes	01989 562209
Local Authority Designated Officer (LADO)	Terry Pilliner	01432 261739 LADO@herefordshire.gov.uk
The Herefordshire Safeguarding Children's Partnership (HSCP)		01432 260100 herefordshiresafeguardingboards.org.uk
Safeguarding Children and Young People in Herefordshire (SCYPiH)		01432 260800
The Multi Agency Safeguarding Hub (MASH) Core working hours: 8.45am - 5.15pm		01432 260800
The Local Authority Education Safeguarding Officers		01432 260858 01432 260417 / 07792 881205
CHANNEL Helpline		020 7340 7264

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Early Help Hub		01432 260261
Emergency Duty Team (EDT) Out of hours / weekends		01905 768020
Prevent Single Point of Contact (SPOC) <i>See Appendix B</i>	Louise George (Headteacher)	01989 562209 lgeorge@walford.hereford.sch.uk
Safer Recruitment	Louise George (Headteacher) Emma Hanham (Deputy Headteacher)	

PART ONE: SAFEGUARDING POLICY

Ratified by the Governing Body/Equivalent on **16/11/2022**

To be reviewed (annually) **November 2022**

Version number: 1

1. Introduction

This policy reflects Herefordshire Council's model Safeguarding and Child Protection Policy and has been adapted in line with the ethos of Walford Nursery & Primary School.

At Walford Nursery & Primary School, safeguarding is everyone's responsibility.

Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interest of the child (KCSIE, p.5).

The Governing Body takes seriously its responsibility, under section 175 of the Education Act 2002, to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

The school aims to ensure that:

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

1.1 Safeguarding is defined as:

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

1.2 Child Protection is defined as:

- the activity that is undertaken to protect specific children who are suffering or likely to suffer significant harm (Working Together, DfE 2018).

This includes, but is not limited to, safeguarding children in specific circumstances, such as:

Neglect	Physical abuse
Emotional abuse	Sexual abuse
Bullying, including online and prejudice-based bullying	Racist, disability and homophobic or transphobic abuse
Gender based violence / violence against women and girls	Radicalisation and /or extremist behaviour
Child sexual exploitation and trafficking	The impact of new technologies on sexual behaviour, e.g., Youth produced sexual imagery
Teenage relationship abuse	Substance abuse
Gang / youth violence including initiation / hazing	Domestic abuse / violence
Female Genital Mutilation	Forced Marriage
Fabricated / induced illness	Poor parenting
Online including grooming via social networking, online gaming, video messaging	Child on Child abuse
Self-Harm behaviours	Children with mental health difficulties or illness
Up skirting	Contextual / extra familiar risks

Walford Nursery & Primary School is committed to safeguarding and promoting the welfare of all its children. We believe that:

- all children/young people have an equal right to be protected from harm;
- children/young people need support which matches their individual needs, including those who may have experienced abuse;
- all children/young people have the right to speak freely and voice their values and beliefs;
- where there is a safeguarding concern, governing bodies and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide;

- all children/young people must be encouraged to respect each other's values and support each other;
- all children/young people have the right to be supported to meet their emotional and social needs as well as their educational needs;
- schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk-taking behaviours which may be perceived to be 'risky';
- all staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse;
- the school have a zero tolerance approach to sexual violence and sexual harassment.

Walford Nursery & Primary School will fulfil their local and national responsibilities as laid out in the following documents:

- [Working Together to Safeguard Children \(DfE 2018\)](#)
- [Keeping Children Safe in Education \(DfE September 2022\)](#)
- 'Safeguarding Children and Safer Recruitment in Education' issued April 2012
- Relevant sections of the Children Act 2004. The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- [Sexting in Schools and Colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety, 2016\)](#)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people Dec 2020
- Safer working practice Feb 2022
- [Information Sharing \(HM Govt July 2018\)](#)
- The procedures of Herefordshire Safeguarding Children Partnership
herefordshiresafeguardingboards.org.uk
- The Children Act 1989
- The Education Act 2002 s175 / s157, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police

where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- The Human Rights Act
- The Equality Act 2010
- Statutory guidance on the Prevent Duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [What to do if you are worried a child is being abused \(DfE, 2015\)](#)
- [Use of reasonable force in schools \(DfE, 2013\)](#)
- [Mental Health and Behaviour in Schools: Departmental Advice \(DfE, 2018\)](#)
- [Preventing and Tackling Bullying: Advice for Head Teachers, Staff and Governing Bodies \(DfE, 2017\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)
- [Criminal exploitation of children and vulnerable adults county lines \(Home Office Guidance\)](#)
- [Child missing from home or care \(DfE statutory guidance\)](#)
- [Child sexual exploitation advice for practitioners \(DfE advice for practitioners\)](#)
- Domestic abuse (Home Office advice)
- Drugs (DfE and ACPO guidance)
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)
- Teaching Online Safety in School June 2019

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf

Walford Nursery & Primary School will ensure that child protection policies will include procedures for dealing with child on child abuse.

2. The Designated Safeguarding Lead

The Designated Safeguarding Lead, Louise George (Headteacher), is a member of the Senior Leadership Team and takes lead responsibility for coordinating all child protection activity within the school. They will provide support to staff members to carry out their safeguarding duties and

will liaise closely with other services such as the early help hub, children's social care, health, police, etc. Louise George has lead responsibility and holds the management oversight for safeguarding and child protection.

The Designated Safeguarding Lead is supported by the following Deputy Designated Safeguarding Lead/s: Emma Hanham (Deputy Headteacher), Hayley Nicholls (Year 6 Teacher) and Claire Weyman (Year 1 Teacher).

The Deputy Designated Safeguarding Leads are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility.

When the school has concerns about a child, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with the 'Right Help Right Time' document and initiate a response accordingly. This may include providing a single agency early help response, undertaking effective support or Graded Care Profile 2 or referral to Children's Social Care for a statutory social work assessment. The Head Teacher will be kept apprised of cases as appropriate.

DSL/School will refer to the Model Setting Concern Process if a concern becomes apparent regarding a child. For further information, please see **Appendix 12**.

- The Designated Safeguarding Lead will support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff.
- The DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with Working Together to Safeguard Children (2018), [the NSPCC – when to call police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.
- The Designated Safeguarding Lead will refer cases to the Police where a crime may have been committed. Designated Safeguarding Leads will report appropriate incidents irrespective of whether or not the individual concerned wants to pursue it as there have been increased cases of them not doing it.
- The Designated Safeguarding Lead will seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required.
- The Designated Safeguarding Lead will ensure, where necessary, referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child.
- The Designated Safeguarding Lead will lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-making will be recorded in case files.
- The Designated Safeguarding Lead will ensure safeguarding and child protection information is dealt with in a confidential manner and in accordance with the HSCP's information sharing guidance.

- The Designated Safeguarding Lead understands that compliance is measured via the annual audit return, as per the statutory duty, to safeguard children across the local authority.
- Staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and / or family.
- A written record will be made of what information has been shared with whom, and when.
- The Designated Safeguarding Lead will ensure that safeguarding and child protection records are stored securely in a central place separate from academic records.
- Individual files will be kept for each child: the school will not keep family files.
- The Designated Safeguarding Lead will ensure access to safeguarding and child protection records by staff other than by the Designated Safeguarding Lead is restricted, and a written record will be kept of who has had access to them and when.
- The Designated Safeguarding Lead will ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff.
- General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.
- The Designated Safeguarding Lead will ensure that for best practice, case load supervision occurs regularly to identify next steps and escalation, in order to provide the best outcomes for children.

The Designated Safeguarding Lead will not disclose to a parent any information held on a child if this would put the child at risk of significant harm. In such circumstances, advice will be sought from Children's Social Care.

If a child moves from the school, the Designated Safeguarding Lead will ensure safeguarding records are forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The school will record where and to whom the records have been passed and the date which should be within five days.

If sending by post, children's records will be sent by 'Special / Recorded Delivery'. For audit purposes, a note of all children's records transferred or received should be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

- If a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation.

- If a child is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team and a meeting is held in line with the Herefordshire Elective Home Education policy.
- When a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder. This exchange should be recorded as part of the incoming role holder's induction/performance management.
- In exceptional circumstances, when a face-to-face handover is not feasible, the Head Teacher will ensure that the new post holder is fully conversant with all procedures and case files.

3. Overall Aims

This policy will contribute to safeguarding our children and promoting their welfare by:

- clarifying standards of behaviour for staff and children;
- contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect, and shared values;
- creating an organisational culture that is safe for children;
- introducing appropriate work within the curriculum;
- encouraging children and parents to participate;
- developing staff's awareness of the risks and vulnerabilities children face to enable them to recognise and respond to concerns;
- addressing concerns at the earliest possible stage in the least intrusive way;
- capturing the child's voice, where possible.

4. Key Principles

- Always see the child first and consider what life is like for the child, maintaining a culture of vigilance.
- Provide support and intervention at the earliest possible opportunity in the least intrusive way in accordance with the 'Right Help Right Time' document to identify what is the best support for the family at the time.
- Have conversations, build relationships and maintain professional curiosity.
- Focus on securing improved outcomes for children.

- Build a culture of openness and transparency where all staff are able to demonstrate understanding of their role and responsibility to safeguard and promote the welfare of children.
- Every child is entitled to a rich and rounded curriculum.
- When issues arise, headteachers should speak out, addressing them internally where possible and engaging in a multi-agency response when required in accordance with interagency procedures.

5. Key Processes

All staff should be aware of the guidance issued by the HSCP within the 'Right Help Right Time' document in order to secure support and intervention for children and young people at the earliest possible opportunity in the least intrusive way.

This document is integral to safeguarding children in Herefordshire educational establishments and will always be used to underpin decision-making.

6. Expectations

All staff and regular visitors will:

- be familiar with this safeguarding policy and implement this consistently in the course of their work with children and young people;
- be aware of the role and identity of the designated safeguarding leads and deputies for the school;
- undertake referrals of child protection concerns to Children's Services in the absence of the designated safeguarding officer and be aware of the statutory assessments under Section 17 and Section 47 of the Children Act 1989 that they may contribute to;
- be subject to Safer Recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc;
- be involved in the implementation of individual education programmes, early help assessments and plans, child in need plans and interagency child protection plans;
- be alert to signs and indicators of safeguarding concerns and possible abuse;
- record concerns and pass the record to the Designated Safeguarding Lead, Louise George;
- recognise and respond to concerns about the behaviour of staff, students and volunteers which indicates they may pose a risk of harm to children following interagency procedures agreed by the HSCP;
- deal with a disclosure of abuse from a child in line with the guidance in **Appendix 2**;

- all staff will receive single agency foundation training at the point of induction and this will be regularly updated at a minimum of two-year intervals;
- the designated safeguarding lead together with named deputies will undertake additional higher level training in order to ensure they have appropriate knowledge and skills to undertake the role and will utilise these training opportunities available from the HSCP and other organisations as agreed by the governing body. This training will be regularly updated at a minimum of two-yearly intervals;
- in addition to the above, all staff will receive annual safeguarding updates, which may include e-learning, circulation of information and guidance internally, staff meetings, inset training;
- the subject / topics for training and updates will take into consideration HSCP priorities, local context and needs of pupils and identified training needs of staff.
- be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This will not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

7. Operation Encompass

At Walford Nursery & Primary School, we are working in partnership with Herefordshire Council and West Mercia Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally and locally, this scheme is called Operation Encompass. In order to achieve this, the police will share information of all domestic incidents with the Herefordshire MASH, where one of the pupils in the school has been affected. On receipt of any information, the Education MASH representative will inform the school and advise on any support the child may require.

All information sharing and resulting actions will be undertaken in accordance with the 'Operation Encompass Guidance for Schools'. The information will be recorded and stored in accordance with the record keeping procedures outlined in this policy.

8. The Governing Body

The governing body will:

- ensure that they comply with their duties under legislation;
- ensure they facilitate a whole school or college approach to safeguarding, this means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development;

- have regard to Keeping Children Safe in Education (KCSIE) 2022 to ensure that the policies, procedures and training are effective and comply with the law at all times;
- appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person to the Designated Safeguarding Lead.
- The Chair of Governors will act as the 'Case Manager' in the event that an allegation of abuse is made against the Headteacher.

The governing body will ensure that:

The school contributes to inter-agency working in line with the statutory guidance within 'Working Together to Safeguard Children' 2018.

This includes providing a co-ordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

- The school provides an appropriate safeguarding response in accordance with the Effective Support document and local safeguarding procedures in order to safeguard children.
- The school provides a Child on Child abuse policy if they do not choose to adopt the local authority model Child on Child abuse policy.
- Procedures are in place within the child protection policy to minimise peer on peer abuse and these are well understood across all staff.
- Online safety is considered with increasing work online, which poses concerns around potentially harmful and inappropriate online material. Governing bodies will ensure that appropriate filters and monitoring systems are in place.
- The school complete regular updated safeguarding training, including online safety training and ensure that children are taught about safeguarding and online safety.
- Safeguarding training for staff, including online safety training, is considered as a whole school approach to safeguarding and curriculum planning.
- The school maintains information about the legal status of all children including whether a looked after child is subject to S20 voluntary, interim or full care order, contact details for persons with parental responsibility, level of delegated authority, details of the social worker and the virtual head in the authority that looks after the child.
- There is a designated teacher with the appropriate training skills and knowledge appointed to promote the academic achievement of looked after children and children previously looked after.
- The school/DSL takes into account the procedures and practice of the Local Authority as part of the inter-agency procedures set up by the Multi Agency Safeguarding Arrangement (HSCP). This includes working with Children's Social Care from other authorities when children attend school in Herefordshire but live outside of Herefordshire.

- The school shares information with other professionals in the interests of safeguarding children in accordance with the guidance within [Working Together to Safeguard Children 2018](#) and [Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers, 2018](#).
- The school follows local procedures for sharing intelligence in relation to Child Sexual Exploitation with West Mercia Police and the Point of Contact for CSE within Herefordshire Council.
- The school initiates appropriate safeguarding responses to children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse, exploitation or radicalisation and to help prevent the risks of them going missing in future.
- The Headteacher ensures that safeguarding policies and procedures which have been adopted by the Governing Body are consistently implemented.
- The school has a staff code of conduct which includes, amongst other things, staff/child relationships and communications including the use of social media and other online platforms.
- The school has procedures for managing allegations and concerns about adults that work or volunteer with children and that these include the procedures for making referrals to the Disclosure and Barring Service, LADO and NCTL as the teaching professional body where appropriate.
- The school operates safer recruitment procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers in accordance with Keeping Children Safe in Education 2022.
- The Designated Safeguarding Lead is a member of the Senior Leadership Team and has lead responsibility for safeguarding which is not delegated. This is clearly defined within the role holder's job description and this person must have the appropriate authority, time, training, funding and resources to undertake this role as per *Appendix B* of Keeping Children Safe in Education, 2022.
- The Designated Safeguarding Lead maintains management oversight of any work undertaken by the Deputy Designated Safeguarding Lead.
- Any Deputy Designated Safeguarding Lead has the appropriate training skills and knowledge to undertake the operational function of the Designated Safeguarding Lead as per *Appendix B* of Keeping Children Safe in Education, 2022.
- The Designated Safeguarding Lead and any Deputies undertake HSCP higher level training to ensure they have the appropriate training, skills and knowledge to carry out this role. In addition, the Designated Safeguarding Lead and any Deputies will update their knowledge by receiving safeguarding updates via the designated safeguarding officer network events, attendance at training and learning events offered by the HSCP, online updates via NSPCC or attendance at professional development events.

- The Head Teacher and all other staff who work with children undertake safeguarding training in accordance with Keeping Children Safe in Education, 2022 and that they receive annual safeguarding updates to ensure their continued professional development.
- These updates take account of HSCP priorities, the local context, the needs of the pupils and other identified training needs.
- There is a policy as cited in KCSIE (2022) that provides a response to low level concerns.
- All training will incorporate safeguarding children in specific a circumstance that includes, but is not limited to Child Sexual Exploitation (CSE), Female Genital Mutilation (FGM), vulnerability to radicalisation and peer on peer abuse.
- The training will ensure that child on child abuse is never seen as 'banter' or part of growing up and incorporates issues of sexually harmful behaviours such as sexual touching or assault and gang initiation or hazing type violence. The training recognises how alcohol use, drug use, truanting and youth generated sexualised imagery increases risks of harm to children. In addition, the training will also ensure staff have the skills and knowledge about the additional vulnerability of Looked After Children.
- The school has appropriate safeguarding responses for children who go missing from education which should include holding more than one emergency contact number for pupils.
- Temporary staff and volunteers are made aware of the school's policies and procedures for child protection and their responsibilities.
- The school remedies any deficiencies or weaknesses brought to its attention without delay; and recognises the importance of utilising the expertise of the Designated Safeguarding Lead and Deputies in shaping safeguarding arrangements.
- There are appropriate online filtering and monitoring systems within the school which safeguards children from accessing inappropriate or harmful online material. Over blocking of material which could impair children's independent research and learning will be avoided.
- The school and governing body understand that within alternative provisions, children may have complex needs and may have an additional risk of harm (see further information via [Alternative Provision - DfE Statutory Guidance](#)).
- The curriculum is delivered in such a way to include educating children about how to stay safe which will include Relationships and Sex Education (RSE), online safety and broader safeguarding messages within Personal, Social & Health Education (PSHE).
- There are processes in place which enable children and young people to express their wishes and feelings and provide feedback.

The governing body reviews its policies and procedures annually (further details on specific policies are cited in KCSIE, 2022).

- The nominated governor for child protection at the school is Emma Parkes. The nominated governor is responsible for liaising with the Head Teacher (DSL) and the DDSLs over all matters regarding child protection issues.
- The governing body and proprietors will ensure that appropriate policies are in place in order for appropriate action to be taken in a timely manner to support children's welfare.
- The governing body's role is strategic rather than operational; they will not be involved in concerns about individual children.
- Should ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.
- The chair of the governing body, Mr Paul Deneen, is nominated to liaise with the designated officer(s) from the relevant local authority and partner agencies in the event of allegations of abuse made against the Headteacher.
- Should be aware of their obligations under the Human Rights Act 1998 21, the Equality Act 2010²², (including the Public Sector Equality Duty²³), and their local multi-agency safeguarding arrangements.

9. ICT Network Managers

Each site's Network Manager is responsible for maintaining safe systems of internet access, blocking any undesirable (e.g. pornographic, racist, violent) sites. This includes checking that:

- the IT infrastructure in Walford Nursery & Primary School is secure and meets e-safety technical requirements;
- the Walford Nursery & Primary School password policy is adhered to;
- the Walford Nursery & Primary School filtering policy is applied and updated on a regular basis and that its implementation is not the sole responsibility of any single person;
- the Walford Nursery & Primary School filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content Your Internet Connection Blocks Child Abuse & Terrorist Content), (KSCIE 2022, para 141)
- the leader keeps up-to-date with e-safety technical information;
- the Walford Nursery & Primary School IT infrastructure (network, remote access, e-mail, VLE etc.) is regularly monitored in order that any misuse or attempted misuse can be reported to the E-Safety Manager, SLT, HOY or PSO for investigation/action/sanction;
- when children use the Walford Nursery & Primary School's network to access the internet, they are protected from inappropriate content by our filtering and monitoring systems.

10. Pupils (to an age appropriate level)

- Pupils are responsible for using the school's IT systems in accordance with the Pupil Acceptable Usage Policy, which they will be required to sign before being given access to Walford Nursery & Primary School systems.
- Parents/carers will be required to read through and sign alongside their child's signature.
- Pupils need to understand the importance of reporting abuse, misuse or access to inappropriate materials and know how to do so.
- Pupils should understand the importance of adopting good e-safety practice when using digital technologies out of school and realise that the E-Safety Policy also covers their actions out of Walford Nursery & Primary School.

11. Online Safety

Walford Nursery & Primary School ensures that children are safeguarded from potentially harmful and inappropriate online material. We have an effective whole school approach to online safety, that empowers us to protect and educate pupils and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
- **Contact:** being subjected to harmful online interaction with other users; for example: child on 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; for example, 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).
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, or staff are at risk, please report it to the Anti-Phishing Working Group.

The Governing Body should ensure online safety is a running and interrelated theme whilst devising and implementing their whole school approach to safeguarding and related policies and procedures. This will include considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement (KCSIE 2022, para 136).

12. Online Hoaxes and Challenges

A hoax is a deliberate lie designed to seem truthful. A challenge will generally involve the user recording themselves taking a challenge and then distributing it – the circulation of these challenges may dare or inspire others to try it. Many challenges can be potentially harmful or life threatening. In cases of online hoaxes or challenges, we follow the Harmful Online Challenges and Online Hoaxes non-statutory DfE guidance (published 12th February 2021).

The DSL will be involved with any suspected or reported cases of online hoaxes or challenges. Each case will be reviewed individually to assess the scale and nature of possible risk to children and young people. The DSL will assess the facts of the situation and whether it is a national risk or localised to the area or institution. The DSL can check the factual basis with reliable sources such as Professional Online Safety Helpline from the UK Safer Internet Centre. If it is a local risk, local advice will be sought such as the Local Authority or police as appropriate.

13. Information Sharing and Confidentiality

Walford Nursery & Primary School has regard to Information Sharing and follows the Herefordshire council guidance and procedures. Personal information about children and families held by agencies should not normally be disclosed without the consent of the subject. The law permits, however, the disclosure of confidential information necessary to safeguard the child or act in their best interests. The school is aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

This includes:

- Confidence in the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is treated as 'special category personal data'.
- Understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- For schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met they must withhold providing the data in compliance with school's obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt academies/nurseries should seek independent legal advice.

- DPA and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe and promoting their welfare. If in any doubt about sharing information, staff should speak to the designated safeguarding lead or a deputy. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children (KSCIE 2022, para 57).

Other relevant policies which should be read in conjunction with this policy are:

- Anti-racism Policy
- Anti-Bullying Policy
- Internet / e-safety
- Equality Policy (and Equality Statement for the setting)
- Supporting Pupils with Medical Needs Policy
- Misuse of Drugs & Alcohol Policy
- Educational Visits Policy
- Attendance Policy
- Behaviour Management & Physical Intervention Policy
- Admissions Policy
- Whistleblowing (Confidential Reporting Policy)
- Sex & Relationships Policy
- Screening, Searching & Confiscation Policy
- GDPR Policy & Privacy Notices
- Child on Child Abuse Policy

14. Pupil Information

In order to keep pupils safe and provide appropriate care for them, Walford Nursery & Primary School will maintain accurate and up to date information regarding:

- names and contact details of persons with whom the pupil normally lives;
- names and contact details of all persons with parental responsibility (if different from above);
- emergency contact details (if different from above);
- details of any persons authorised to collect the pupil from the school (if different from above);

- any relevant court orders in place including those which affect any person's access to the pupil (e.g. Residence Order, Contact Order, Care Order, Injunctions etc);
- if the pupil is or has been the subject of a Child Protection Plan/ statutory assessment;
- name and contact detail of G.P;
- life threatening medical conditions;
- any other factors which may impact on the safety and welfare of the pupil, i.e., Early Help assessments.

The school will collate, store and agree access to this information. The Data Protection Policy informs stakeholders how and what data is shared. Parents/carers are then able to opt out of this system. The school has control over access to information.

15. Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools to act in a way that is incompatible with the Convention. The specific convention rights applying to schools are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right);
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity;
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and;
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Further information (including on absolute and qualified rights) can be found at Human Rights Equality and Human Rights Commission (equalityhumanrights.com).

16. Equality Act 2010

At Walford Nursery & Primary School, we recognise that schools have obligations under the Equality Act 2010. According to the Equality Act, schools and colleges must not unlawfully

discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools in relation to safeguarding and promoting the welfare of children, governing bodies should carefully consider how they are supporting their pupils with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions. A school, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

17. Public Sector Equality Duty (PSED)

At Walford Nursery & Primary School, we adhere to the Public Sector Equality Duty (PSED) which is found in the Equality Act. The PSED places a general duty on schools to have, in the exercise of their functions, due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, specific consideration must be given to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

The PSED helps schools (which are subject to it) to focus on key issues of concern and how to improve pupil and student outcomes. Some pupils may be more at risk of harm from specific issues such as sexual violence, homophobic, biphobic or transphobic bullying or racial discrimination. Such concerns will differ between education settings, therefore, each school policy will be conscious and reflective of disproportionate vulnerabilities that exist.

18. A Safer School Culture

- The culture of this school is one that is safe for children and unsafe for adults that may pose a risk to children.
- There is a belief that safeguarding is the responsibility of all adults working or volunteering within the organisation and that all concerns will be reported to the Designated Safeguarding Lead or Head Teacher when concerns relate to an adult.
- The school has a culture of listening to, and hearing the voice of the child.
- The school ensures victims are taken seriously and allegations are responded to appropriately.

19. Inspection

From September 2019, Ofsted's inspections of early years, schools and post – 16 provision will be carried out under Ofsted's Education Framework.

Walford Nursery & Primary School will be aware of the new inspection guidance and the requirements from Ofsted. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.

20. Safer Recruitment and Selection

Walford Nursery & Primary School pays full regard to 'Keeping Children Safe in Education' (DfE 2022). Safer recruitment practice includes scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

As part of the shortlisting process, schools and colleges should consider carrying out an online search as part of their due diligence on shortlisted candidates to help identify any incidents or issues that have happened, and are publicly available online which the school might want to explore with applicants at interview.

It also includes undertaking interviews and undertaking appropriate checks through the Disclosure and Barring Service (DBS), Childcare (Disqualification) Regulations (where applicable) and prohibition order checks in respect of the following which will also include historic GTCE sanctions and EEA regulating authorities. For best practice, the name on the birth certificate should be checked. The school acknowledges that S128 checks should be completed on governors.

A section 128 would prohibit someone from:

- serving as a school governor;
- undertaking a management position in an independent school, academy, or in a free school as an employee;

- being a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or
- being a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

All recruitment materials will include reference to the school's commitment to safeguarding and promoting the wellbeing of children.

Louise George (DSL) and Emma Hanham (DDSL) have undertaken Safer Recruitment training. At least one of the above will be involved in **all** staff / volunteer recruitment processes and sit on the recruitment panel.

21. Our Role in the Prevention of Abuse

In accordance with Working Together 2018, the school recognises the need to safeguard children from:

- neglect
- emotional abuse
- physical abuse
- sexual abuse

Appendix 1 contains more information about definitions and indicators. In addition, the school are alert to the need to safeguard children in specific circumstances as defined within Keeping Children Safe in Education 2022. The safeguarding policy cannot be separated from the general ethos of the school, which should ensure that children are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice and are listened to.

Other Areas of Work

All our policies, which address issues of power and potential harm to ensure a whole school approach are as follows:

- safer recruitment
- physical restraint & restriction of liberty
- professional code of conduct
- PSHE
- visitor / external speakers
- disqualification
- online safety

- social networking
- whistleblowing
- health and safety
- children missing education
- bullying
- inclusion
- professional code of conduct

22. The Curriculum

Walford Nursery & Primary School will provide opportunities for children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being together with preparing children for life in modern Britain and embedding Fundamental British Values.

Relevant issues will be addressed through the PSHE curriculum, for example self-esteem, emotional literacy, assertiveness, power, sex and relationship education, online and bullying. This will be undertaken with reference to guidance around how to promote children's spiritual, moral, social and cultural development.

Issues will also be addressed through other areas of the curriculum, for example, circle time, English, History, Drama, Art, etc.

Regulations have been put in place whereby the subjects Relationships Education (for primary pupils) and Relationships and Sex Education and Health Education (for secondary pupils) in state funded schools will be mandatory in 2020.

Preventative education is most effective in the context of a whole-school approach that prepares pupils for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny / misandry, homophobia, biphobic and sexual violence/harassment. The school has a clear set of values and standards, upheld and demonstrated throughout all aspects of school life. These will be underpinned by the school's behaviour policy and pastoral support system, as well as by a planned programme of evidence-based RSHE delivered in regularly timetabled lessons and reinforced throughout the whole curriculum.

The school will provide information to pupils regarding harmful online challenges and online hoaxes.

23. Identifying children and young people who may be suffering significant harm.

Teachers and other adults in our school are well placed to observe any physical, emotional or behavioural signs which indicate that a child may be suffering significant harm. The relationships between staff, pupils, parents and the public which foster respect, confidence and trust can lead to disclosures of abuse, and school staff being alerted to concerns. All staff should be aware that children may not feel ready or know how to tell someone they are being abused. This could be

due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.

All staff should be aware of the importance of understanding intra familial harms and any necessary support needed for siblings following incidents. There may be ongoing risks to the victim, other children, adult students or school staff (KCSIE 2022, para 482). Children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. Our school's child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration.
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children.
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in managing or reporting these challenges.
- Cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so (KCSIE 2022, para 198).

Any reports of abuse involving children with SEND will, therefore, require close liaison with the designated safeguarding lead (or deputy) and the SENCO or the named person with oversight for SEND (KSCIE 2022, para 199). Schools should consider extra pastoral support and attention for these children, along with ensuring any appropriate support for communication is in place (KSCIE 2022, para 200). Further information can be found in the school's:

- SEND Code of Practice 0 to 25
- Supporting Pupils at School with Medical Conditions.
- And from specialist organisations:
Mencap: Represents people with learning disabilities, with specific advice and information for people who work with children and young people.

Council for disabled children: Every Local area has an information, advice and support service, providing information, advice and support to disabled children and young people, and those with SEND, and their parents.

At Walford Nursery & Primary School, we identify pupils who might need more support to be kept safe or to keep themselves safe by following the Special Education Provision four-part cycle:

ASSESS - This could involve a range of methods including, but not limited to, teachers' assessment of pupil progress, attainment and behaviour, results of standardised tests screening

and profiling tests, questionnaires of parents and young people and observations.

PLAN - This is likely to involve the SENCO, working with teachers to plan appropriate provision, which is clearly communicated with all concerned. This may be in class support or more targeted provision. Any planning will have a clear focus on expected outcomes for the child or young person.

DO - The SEND Code of Practice places the teacher at the centre of the day-to-day responsibility for working with all pupils, it is imperative that teachers work closely with any teaching assistants or specialist staff involved to plan and assess the impact of targeted interventions.

REVIEW - The progress of pupils who are receiving SEN Support is reviewed termly and the school meets with parents three times a year. This includes the school's regular tracking processes.

24. Safeguarding in Specific Circumstances: Domestic Abuse

Walford Nursery & Primary School will ensure that staff are aware that domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, 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, wellbeing, development, and ability to learn.

25. Safeguarding in Specific Circumstances: Children who are vulnerable to extremism (Prevent Duty)

Walford Nursery & Primary School:

- seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right / Neo Nazi / White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements;
- will act in accordance with the Prevent Duty placed upon the school by the Counter Terrorism and Security Act 2015, we understand the specific need to safeguard children, young people and families from violent extremism;
- are clear that this exploitation and radicalisation should be viewed as a safeguarding concern;
- understand the referral processes in place within Herefordshire should a Prevent concern arise;

- values freedom of speech and the expression of beliefs / ideology as fundamental rights underpinning our society's values. Both children and teachers have the right to speak freely and voice their opinions, however, free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued;
- uphold and promote the fundamental British values of democracy, the rule of law, individual liberty, and mutual respect and tolerance of those with different faiths and beliefs.

Definitions of radicalisation and extremism and indicators of vulnerability to radicalisation are in **Appendix 5**. A Prevent risk assessment can be found in **Appendix 15**.

Risk Reduction

The school governors, the Head Teacher and the Designated Safeguarding Lead will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include consideration of the school's RE curriculum, SEND policy, assembly policy, the use of school premises by external agencies, integration of children by gender and SEN, anti-bullying policy and other issues specific to the school's profile, community and philosophy.

The school Prevent Action Plan template may be used to demonstrate how the organisation is fulfilling the Prevent duty. Please see **Appendix 15** for further information.

This risk assessment will be reviewed as part of the annual s175 return that is monitored by the local authority and the local Multi Agency Safeguarding arrangements.

In accordance with the Prevent Duty, **Louise George, Headteacher, is the Prevent Single Point of Contact (SPOC)** who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism.

When any member of staff has concerns that a child may be at risk of radicalisation or involvement in terrorism, they should speak with the SPOC and to the Designated Safeguarding Lead, if this is not the same person.

If a child or young person is thought to be at risk of radicalisation, advice will be sought from the Channel Team or the Multi Agency Safeguarding Hub. A referral will be made to the Multi Agency Safeguarding Hub, and if advised, information will be shared with the Channel Panel.

In all cases, in accordance with advice provided from the Channel Team or Multi Agency Safeguarding Hub, the school will ensure appropriate interventions are secured which are in line with local procedures in order to safeguard children assessed as being vulnerable to radicalisation.

If the school are concerned that a child may be at risk of significant harm in relation to radicalisation or involvement in violent extremism a child, protection referral will be made to the Multi Agency Safeguarding Hub.

26. Safeguarding Children in Specific Circumstances: Female Genital Mutilation (FGM) / Forced Marriage / Modern Day Slavery

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It can be known as female circumcision or female genital cutting and is often carried out for cultural, religious and social reasons within families and communities.

FGM is illegal in the UK and it's also illegal to take a British national or permanent resident abroad for FGM, or help someone trying to do this.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers** (along with social workers and healthcare professionals) **to report to the police** where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. This is in addition to following the school's safeguarding reporting procedures. A Teacher means any person within the Education Act 2002 (section 141A(1)) employed or engaged to carry out teaching work at schools or other institutions.

Those failing to report such cases will face disciplinary sanctions.

If the school are concerned that a child / young person has experienced or is at risk of FGM a Child Protection referral will be made to the Multi Agency Safeguarding Hub in accordance with interagency procedures produced by the HSCP and all teachers will follow mandatory reporting duties.

Further information regarding FGM can be found in **Appendix 6**.

A forced marriage is where one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage and pressure or abuse is used. It is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights.

The pressure put on people to marry against their will can be physical (including threats, actual physical violence and sexual violence) or emotional and psychological, for example, when someone is made to feel like they are bringing shame on their family. Financial abuse (taking your wages or not giving you any money) can also be a factor.

The Anti-social Behavior, Crime and Policing Act 2014 makes it a criminal offence to force someone to marry. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place);
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not);
- breaching a Forced Marriage Protection Order.

Modern Slavery is the term used within the UK and is defined within the Modern Slavery Act 2015. The Act categorises offences of Slavery, Servitude and Forced or Compulsory Labour and Human Trafficking (the definition of which comes from the Palermo Protocol).

These crimes include holding a person in a position of slavery, servitude forced or compulsory labour, or facilitating their travel with the intention of exploiting them soon after. Although human

trafficking often involves an international cross-border element, it is also possible to be a victim of modern slavery within your own country.

Types of Human Trafficking

There are several broad categories of exploitation linked to human trafficking, including:

- sexual exploitation
- forced labour
- domestic servitude
- organ harvesting
- child related crimes such as child sexual exploitation, forced begging, illegal drug cultivation, organised theft, related benefit frauds etc
- forced marriage and illegal adoption (if other constituent elements are present).

27. Safeguarding Children in Specific Circumstances: Child on Child Abuse

Walford Nursery & Primary School are aware that children can abuse other children (often referred to as child on child abuse). It can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

The school recognises that children can abuse other children and such behaviours are never viewed simply as 'banter' or as part of growing up. Down playing certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviour and an unsafe environment for children. Subsequently this can normalise abuse, leading children to accept that this is normal and minimises the chances of children reporting abuse.

Child on child abuse can take many different forms, such as:

- cyber-bullying
- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- physical abuse, hitting, kicking, shaking, biting, hair pulling ((this may include an online element which facilitates, threatens and/or encourages physical abuse)
- sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet by persons aged under 18 (referred to as youth Produced Sexual Imagery)
- consensual and non-consensual sharing of nudes and semi nudes images and or videos¹³ (also known as sexting or youth produced sexual imagery)
- sexual assault, causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
- sexual violence or harassment such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- upskirting (up skirting is an illegal offence 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)
- sexually harmful or problematic behaviour
- gang initiation or hazing type violence
- 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).

The school understands that even if there are no reports within their school, it does not mean it is not happening and that it may be the case that it is just not being reported. As such, it is important that if staff have **any** concerns regarding child on child abuse, they should speak to their DSL or DDSs.

Staff should be clear as to the school's policy and procedures with regards to child on child abuse and the role they have to play in preventing it. Walford Nursery & Primary School identify the indicators of child on child abuse and respond where they believe a child may be at risk from it.

The school will reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

The school understands the referral pathways in response to sexual harassment and sexual violence, as identified in Part 5 of KCSIE (2022).

The school will follow [Sexual Violence and Sexual Harassment guidance](#) (DfE, 2021) when responding to such issues alongside local interagency procedures and the Harmful Sexual Behaviours strategy. This includes responding to any reports in a child centred manner and undertaking an immediate risk and needs assessment in relation to the victim, the alleged perpetrator and other children. The school will respond to reports of sexual violence and sexual harassment on a case-by-case basis considering the 'Right Help Right Time' document, whether a criminal offence may have been considered and whether a report to the Multi Agency Safeguarding Hub or the police is necessary. The school will also consider seeking specialist advice, guidance and assessment and will work with partner agencies in relation to management of information and what should be shared with staff, parents and carers.

The school understands serious violence and what may signal that children are at risk from, or are involved in serious violent crime. Indicators may include increased absences, a change in friendships/relationships with older individuals or groups, a significant decline in performance, self-harm, significant change in wellbeing or signs of assaulted/unexplained injuries. Unexplained gifts or new possessions could indicate that children have been appropriated, or are involved with, individuals associated with criminal networks or gangs.

The school understands contextual safeguarding and will make a referral in the first instance if apparent.

The school will have sight of 'Part 5 – Child on Child Sexual Violence and Sexual Harassment' in KCSIE (2022) and understand how to report and respond to allegations of sexual violence or sexual harassment.

28. Safeguarding Children in Specific Circumstances: Sexualised Behaviours

Where children display sexualised behaviours, the behaviours will be considered in accordance with the children's developmental understanding, age and impact on the alleged victim. Tools such as the Brook Traffic Light Tool (**Appendix 13**) will be used to assist in determining whether the behaviour is developmental or a cause for concern.

This will assist in ensuring the child/ren receive the right support at the right time, either via the Early Help Hub or a referral to Children's Social Care.

The school will utilise support and guidance from wider services such as West Mercia Rape and Sexual Assault clinic and make referrals where necessary, this includes Assessment Intervention and Moving On (AIM assessment).

The school will manage incidents of sexualised behaviour on a case by case basis, with consideration to the victim and alleged perpetrator.

In all cases of child on child abuse, the school will consider the vulnerability of all children including those alleged to have caused the harm and those alleged to be victims and provide a safeguarding response consistent with the 'Right Help Right Time' document in Herefordshire. Consideration will be applied to violence in young people's relationships.

Where necessary, the school behaviour policies will be invoked and any sanctions applied will be consistent with these procedures.

Where issues indicate that a criminal offence may have been committed, a report will be made to West Mercia Police. The school will support victims through reporting concerns to the police and will ensure the wellbeing of the child is support thereafter.

The school can seek further guidance around harmful sexual behaviours [here](#).

29. Safeguarding Children in Specific Circumstances: Gang Related Violence (Contextual / Extra Familial Risk)

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments.

All staff, but especially the Designated Safeguarding Lead (and deputies), should consider whether children are at risk of exploitation or abuse outside of their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including, but not limited to, sexual exploitation, criminal exploitation and serious youth.

The school are aware of indicators that may signal children are involved with serious violent crime. All staff recognise that these may include:

- increased absences from school;
- a change in friendships or groups (friendships with older children or groups);
- a decline in performance;

- changes to wellbeing or signs of self-harm;
- unexplained injuries;
- unexplained gifts and possessions (this may indicate they have been approached with individuals associated with gangs).

The school identify risk factors associated with children that have been permanently excluded from school. Further advice regarding youth violence is provided in the [Home Office's Preventing youth violence](#) and gang involvement and its [Criminal exploitation of children and vulnerable adults: county lines guidance](#).

The school recognises the risks posed to children in relation to involvement in gang related activity, which may be street gang, peer group or organised crime. Young people who are involved in gangs are more like to suffer harm themselves, through retaliatory violence, displaced retaliation, territorial violence with other gangs or other harm suffered whilst committing a crime. In addition, children may experience violence as part of an initiation or hazing practices.

The school understands that referral can be crucial in the early identification of children who may need additional support due to gang related activity and as such, will provide an appropriate response and/or referral to the Early Help Hub.

Where there are concerns that a child or young person may be, or is at risk of becoming, involved in gang related activity, the Child Exploitation team will be made aware, in accordance with local procedures as part of the safeguarding response.

If information suggests a child may be at risk of significant harm due to gang related activity, a referral will be made to the Multi Agency Safeguarding Hub within Children's Social Care.

The school understand the process of completing a Multi Agency Submission Form which highlights broader concerns contextually, occurring outside of the child's home. See **Appendix 8** for further information.

30. Safeguarding Children in Specific Circumstances: Youth Generated Sexualised Imagery

The school recognises the impact of online social communication and the issue of sending or posting sexually suggestive images including nude or semi-nude photographs via mobiles or over the internet. The school pay due regard to the guidance issued by the UK Council for Child Internet Safety in relation to how to respond to incidents.

All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos, can be signs that children are at risk.

In all cases, where an incident of youth produced sexual imagery is reported, the following actions will be undertaken:

- the incident will be reported to the Designated Safeguarding Lead, as soon as possible;

the Designated Safeguarding Lead will hold an initial review discussion or meeting with appropriate school staff;

- interviews will be held with the young people involved (if appropriate);
- parents/carers will be informed at an early stage and involved in the process, unless there is good reason to believe that involving parents would put the young person at risk of harm;
- at any point in the process, if there is a concern a young person has been harmed or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

An immediate referral will be made to the Police and Social Care, in the following circumstances:

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

If none of the above applies, the school may choose to deal with the incident without involving the Police or Social Care. This will usually be the case where the Designated Safeguarding Lead is confident that they have enough information to assess the risks to the pupils involved and the risks can be managed within the school pastoral support and disciplinary framework.

All decisions and rationale for decision making will be recorded. All decisions will be based on the best interests of the child(ren).

The school will pay due regard to the Department for Education guidance: [Searching, Screening and Confiscation advice](#).

Adults in the school will not view youth produced sexual imagery unless there is a good and clear reason to do so. Wherever possible, the Designated Safeguarding Lead will respond to an incident based on what they have been told about the imagery.

All incidents will be recorded.

More information is available in **Appendix 7**.

31. Safeguarding Children in Specific Circumstances: Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse 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 clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse, including via the internet.

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge, e.g., through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited, e.g., they believe they are in a genuine romantic relationship.

Child Criminal Exploitation (CCE)

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation, they often commit crimes themselves and their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), therefore, they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited, even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls, who are criminally exploited, can be very different to that of boys. The indicators may not be the same, however, professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female, and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The school recognises that both boys and girls can be vulnerable to Child Sexual Exploitation and as such, ensure staff are alert to signs and indicators.

The school recognises that there are various 'models' of CSE which include, but are not limited to:

- gangs and groups
- boyfriend/girlfriend model
- peer on peer
- familial
- online
- abuse of authority.

Where concerns are identified in relation to Child Sexual Exploitation the 'Right Help Right Time' document will be consulted, in order to ensure the child receives support at the earliest possible opportunity.

A multi-agency response, via the Early Help Hub / Multi Agency Safeguarding Hub (MASH), may be initiated through a referral. Where parental consent cannot be obtained, advice will be sought from the Multi Agency Safeguarding Hub.

If a child is thought to be at risk of significant harm through child sexual exploitation, a referral will be made to the MASH within children's Social Care.

In all cases, intelligence will be shared with West Mercia Police using the information sharing form which will also be copied to the Point of Contact for CSE within Herefordshire Council.

32. Children in Specific Circumstances

Further guidance in relation to safeguarding children in specific circumstances can be located in the HSCP / Herefordshire Council procedures, as listed below:

- abuse linked to spiritual belief
- child sexual exploitation
- safeguarding children vulnerable to gang activity
- supporting individuals vulnerable to violent extremism
- private fostering
- children missing from home or care
- children missing education
- children of parents who misuse substances
- children of parents with learning difficulties
- working with parents/carers with mental health problems
- working with parents/carers with disabilities

- disabled children
- protocol for dealing with domestic violence when children are involved
- online – children exposed to abuse through the digital media
- fabricated or induced illness
- Female Genital Mutilation
- forced marriage / honour based violence
- modern day slavery / human trafficking
- criminal exploitation of children across county Lines
- practice guidance & procedures to distinguish between healthy and abusive sexual behaviours in children and young people
- safeguarding children who may have been trafficked
- protocol & guidance; working with sexually active young people
- working with hostile, non-compliant clients and those who use disguised compliance
- safeguarding young people on the Autism Spectrum.

33. Mental Health

All staff should 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 diagnosis of a mental health problem. However, staff 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 vital that staff are aware of how these experiences, can impact on children's 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, including discussion with the DSL or DDSs.

Schools and colleges can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice.

The school will access a range of advice to help them identify children in need of extra mental health support. This includes working with external agencies as described in [Preventing and Tackling Bullying](#).

34. Children with Additional Needs

The school recognises that while all children have a right to be safe, some children may be more vulnerable to abuse. For example, a young carer, a child frequently missing from home/care, children with disabilities or special educational needs, a child living with domestic abuse, parental mental ill health, or substance abuse or a child who has returned home to their family from care.

The school ensures that assessment and referrals are made to support a child with additional needs, at the earliest opportunity.

When the school is considering either a 'fixed term' or 'permanent' exclusion of a vulnerable child and / or a child who is the subject of a Child Protection Plan, or where there is an existing Child Protection file, a multi-agency risk assessment meeting must be held prior to making the decision to exclude.

In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment *must* be completed prior to convening a meeting of the Governing Body.

35. Children Looked After and Previously Children Looked After.

The most common reason for children becoming looked after is because of abuse and/or neglect. Governing bodies and proprietors will ensure that staff have the skills, knowledge and understanding to keep looked after children safe. In particular, we ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

We also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

Virtual Head - Extra Duties

In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker (KSCIE 2022, para 194).

SECTION 41 – Statutory Children's Social Care Assessments and Services.

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, Walford Nursery & Primary School will make a referral to children's social care and if appropriate the police is made immediately. Referrals will follow the local referral process. Children's social care assessments should consider where children are being harmed in contexts outside the home. The school provides as much

information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

Additional information is available here: Chapter one of Working Together to Safeguard Children. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information with the right people within and between agencies;
- sharing information too slowly;
- a lack of challenge to those who appear not to be taking action.

36. Children Potentially at Greater Risk of Harm

Children who need a social worker (Child in Need and Child Protection Plans)

Sometimes children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead may hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and the school to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services). Findings from the Children in Need review, 'Improving the educational outcomes of Children in Need of help and protection' contains further information; the conclusion of the review, 'Help, protection, education' sets out action Government is taking to support this.

Any child may benefit from early help, but all staff will be particularly alert to the potential need for early help 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;
- is persistently absent from education.

37. Children who are Lesbian, Gay, Bi or Trans (LGBTQ)

The fact that a child or a young person may be LGBTQ is not in itself an inherent risk factor for harm. However, children who are LGBTQ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ. Risks can be compounded where children who are LGBTQ lack a trusted adult with whom they can be open. It is, therefore, vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff. LGBTQ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, bi phobic and transphobic bullying and abuse (KCSIE 2022, para 204).

38. Right Help Right Time

All concerns will be viewed alongside Herefordshire's Right Help Right time document in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way.

The school will also give due regard to the guidance contained in What to do if you are worried a child is being abused, 2015.

In cases where it is not possible to obtain consent from the parent / carer the school will seek advice from the Multi Agency Safeguarding Hub.

The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare / safety of the child or young person and that improvement is sustained.

In the event that provision of Early Help has not led to improvements for the child / young person, or concerns escalate, the school will follow the step-up escalation procedures published by the local Multi Agency Safeguarding Arrangements (HSCP).

In consultation with the Right Help Right time document, if the concerns about the child or young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Multi Agency Safeguarding Hub.

Parents / carers will be informed of the referral unless informing them may place the child / young person at increased risk of harm.

In the event of a professional disagreement in relation to a specific concern, the school will follow the HSCP procedures for resolution of professional disagreements, also known as escalation procedures Escalation policy: Resolution of professional disagreements (procedures.org.uk).

39. Involving Parents / Carers

In general, safeguarding and child protection concerns will be discussed with parents / carers before approaching other agencies. Consent will be sought prior to making a referral. Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

Parents / carers will be informed about the safeguarding policy through:

- the school website
- school prospectus
- newsletters.

40. Multi-Agency Work

The school understands its role in the three safeguarding partner arrangements. Governing bodies and senior leadership teams, especially the designated safeguarding leads, will make themselves aware of and follow their local arrangements.

The school works in partnership with other agencies in the best interests of the children. The school will, where necessary, liaise with the school nurse, and make referrals to children's Social Care.

Referrals and contacts should be made by the DSL or DDSs to either the Early Help Hub or the Multi Agency Safeguarding Hub, depending on the level of need. Where the child already has a social worker, the request for service will go immediately to the social worker involved or in their absence to their team manager or Duty Worker.

The school will co-operate with any child protection enquiries conducted by children's Social Care. The school will ensure representation at appropriate inter-agency meetings such as team around the family meetings, initial and review child protection conferences and core group meetings.

The school will provide reports as required for these meetings, in accordance with the Multi Agency Safeguarding Arrangements (HSCP) interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.

Where a child is subject to an inter-agency Child Protection plan, Child in Need plan or Early Help Assessment, the school will contribute to the preparation, implementation and review of the plan as appropriate.

If a child is subject to a referral to a multi-panel, such as Multi Agency Risk Assessment Conference (MARAC), Multi Agency Gang Panel (MAGPan) or CHANNEL. Channel forms a key part of Prevent. The process adopts a multi-agency approach to identify and provide support to individuals who are at risk of being drawn into terrorism. The school will contribute to such the school will contribute to such arrangements.

41. The use of 'Reasonable Force' in Schools and other Education Settings

There are circumstances when it is appropriate for staff of Walford Nursery & Primary School to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Departmental advice for schools is available Use of reasonable force in schools guidance <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

42. Whistleblowing

Where there are concerns about the way that safeguarding is carried out in the academy/nursery, staff should refer to the Policy for Whistleblowing. A whistleblowing disclosure must be about something that affects the general public, such as:

- A criminal offence has been committed, is being committed or is likely to be committed
- A legal obligation has been breached
- There has been a miscarriage of justice
- The health or safety of any individual has been endangered
- The environment has been damaged
- Information about any of the above has been concealed.

The NSPCC runs a whistleblowing helpline on behalf of the government, the number is 0808 800 5000.

43. Allegations regarding person(s) working in or on behalf of the school (including volunteers and low level concerns).

The school has procedures for dealing with allegations against a member of staff, supply teachers, volunteers or contractors. These procedures are consistent with local safeguarding procedures and practice guidance and have regard to this guidance.

Any concerns about the conduct of other adults in the school should be referred to the Designated Safeguarding Lead; any concerns about the headteacher will be referred to the Chair of Governors. Where it is alleged that anyone working in the school that provides education for children under 18 years of age (including all paid or unpaid staff, supply teachers and volunteers) has:

- behaved in a way that has harmed a child, or may have harmed a child
- 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 if they work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

The school will follow the procedures set out in the school's Managing Allegations of Abuse policy. This includes allegations/concerns that do not meet the harm threshold.

When dealing with allegations, we will:

- apply common sense and judgement
- deal with allegations quickly, fairly and consistently; and
- provide effective protection for the child and support the person subject to the allegation.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should still be shared (KCSIE 2022, para 73).

Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should not be included in any reference (KCSIE 2022, para 223).

Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school/setting's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual (KCSIE 2022, para 419).

For all other cases, where the allegation concluded to be either, unfounded, false, malicious or unsubstantiated the case manager (and if they have been involved the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made (KCSIE 2022, para 420).

If an allegation is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy (KCSIE 2022, para 406).

The school will ensure that low-level concerns are shared confidentially in a way which is clear, easy to understand and implement. Whether all low-level concerns are shared initially with the DSL (or a nominated person (such as a values guardian/ safeguarding champion), or with the Headteacher or Chair of Governors is a matter for the setting to decide. If the former, then the DSL will inform the Chair of Governors of all the low-level concerns and in a timely fashion according to the nature of each particular low-level concern. The Headteacher or the Chair of Governors should be the ultimate decision maker in respect of all low-level concerns, although it is recognised that depending on the nature of some low-level concerns and/or the role of the DSL in some settings, the Headteacher or Chair of governors may take a more collaborative decision making approach (KCSIE 2022, para 432).

The school will ensure all staff understand the school's policy for managing allegations, including the contact details and what information the LADO will require when an allegation is made.

The LADO in Herefordshire can be contacted on 01432 261739.

- The LADO may request a referral, if this is requested the referral will be completed and submitted within 1 working day.
- The school will engage with the LADO at all stages of the management of the allegation / concern and comply with the Statutory Guidance contained within Keeping Children Safe in Education (2022) and the local procedures published by the HSCP.
- The school will consider whether it is necessary to suspend the member of staff while the allegation or concern is investigated. However all reasonable alternatives to manage the risk will be considered.
- Due consideration will be given to the view of the LADO in relation to suspension or in-work safeguards while a matter is investigated
- Should the school dismiss a member of staff/volunteer as a result of a substantiated allegation, or should a member of staff/volunteer resign before an investigation has been completed, in accordance with Statutory Duty a referral to the Disclosure and Barring Service will be made.
- If the member of staff is engaged in teaching work, the school will in accordance with published guidance from the Department for Education consider whether a referral to the National College of Teaching and Leadership (NCTL) should be made
- The school will adhere to the Statutory Guidance contained within Keeping Children Safe in Education (2022) with regard to record keeping, confidentiality, references and compromise or settlement agreements.

If a member of staff, student or volunteer has any concerns about poor, unsafe practice or failures of the safeguarding regime they are encouraged to raise this with the Head Teacher, Senior Leadership Team or Governing Body following the Whistle Blowing Procedures of the school.

The NSPCC whistleblowing helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 which is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

44. Children Missing from Education

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

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

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

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future.

This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

45. Non-Collection of Children

If a child is not collected at the end of the session/day, we will make all reasonable attempts to contact parents/carers or nominated contacts.

If no contact can be made after an hour, we will contact the local authority MASH Team.

The child will stay with a nominated adult in school until either the parent, carer or Social Care Worker arrives.

46. Missing Pupils

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

- inform the DSL promptly;
- try to locate the pupil and establish their whereabouts;
- school staff will endeavour to contact the home and other nominated contacts;
- use professional judgement to risk assess the urgency of the situation before notifying the police and the local authority MASH Team.

47. Homelessness

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

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

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

48. Site Security

Walford Nursery & Primary School provides a secure site which is controlled by precise management directives, but the site is only as secure as the people who use it. Therefore, all people on the site have to adhere to the rules which govern it. Laxity can cause potential problems to safeguarding, therefore:

- gates are kept closed during the school day, visitors gain access through the main entrance;
- visitors, volunteers and students must only enter through the main entrance and after signing in at the office window;
- parents, carers and grandparents attending school functions have access only through the front foyer, with tickets for visitors for appropriate school events;
- children will only be allowed home with adults with parental responsibility or confirmed permission;
- empty classrooms should have closed windows and doors;
- children should never be allowed to leave school alone during school hours, unless collected by an adult such as a parent who is doing so for a valid reason and parents/carers should report to the school office in order to do this.

Monitoring and Review

This policy is monitored by the governing body and will be reviewed annually, or before if necessary.

Signed:

Date: 16 / 11 / 2022

Chair of Governors

Signed:

Date: 16 / 11 / 2022

Headteacher

APPENDICES

Appendix 1

Definitions and Indicators of Abuse

1. 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 occur during pregnancy as a result 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); or
- ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer.

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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers

3. 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 following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area

4. Sexual Exploitation

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care.

The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and
- having unexplained contact with hotels, taxi companies or fast food outlets.

The intelligence reporting form on the HSCP website will be used to share information with Police and children's social care that raises a concern around CSE.

5. 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 include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. 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 also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying, including cyber 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.

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders
- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self harming, drug or solvent abuse

- fear of parents being contacted
- running away
- compulsive stealing
- appetite disorders - anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis

N.B. Some situations where children stop communication suddenly, known as “traumatic mutism”, can indicate maltreatment.

6. Responses from Parents/Carers

Research and experience indicates that the following responses from parents/carers, may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child
- unrealistic expectations or constant complaints about the child
- alcohol misuse or other drug/substance misuse
- parents request removal of the child from home; or
- violence between adults in the household

7. Children with Disabilities

When working with children with disabilities, practitioners need to be aware of those additional vulnerabilities to abuse and neglect, such as:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
- children with Special Educational Needs and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs

- Communication barriers and difficulties in overcoming these barriers.

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
- 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.

8. Domestic Violence

It is now generally acknowledge that domestic violence is a Child Protection and Safeguarding issue. Children who witness or experience domestic violence are likely to suffer emotional harm and may be vulnerable to other forms of abuse and bullying. Staff will need to be sensitive to this fact in their dealings with these children. Information may need to be shared confidentially within the school on a 'need to know' basis. The Designated Safeguarding Lead (DSL) for Child Protection and Safeguarding has responsibility for deciding whom to inform.

Support for victims of domestic violence is available from:

Herefordshire Women's Aid - Tel: **01432 356146**

West Mercia Women's Aid – Tel: **0800 7831359**

wmwa.safeguarding@wmwa.cjsm.net

PO Box 74, Hereford HR4 9WB

Appendix 2

Dealing with a Disclosure of Abuse

When a child tells me about abuse s/he has suffered, what must I remember?

- stay calm
- do not communicate shock, anger or embarrassment
- reassure the child
- tell her/him you are pleased that s/he is speaking to you
- never enter into a pact of secrecy with the child
- assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why
- tell her/him that you believe them
- children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed
- tell the child that it is not her/his fault
- encourage the child to talk but do not ask "leading questions" or press for information
- listen and remember
- check that you have understood correctly what the child is trying to tell you
- praise the child for telling you
- communicate that s/he has a right to be safe and protected
- do not tell the child that what s/he experienced is dirty, naughty or bad
- it is inappropriate to make any comments about the alleged offender
- be aware that the child may retract what s/he has told you. It is essential to record all you have heard
- at the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know
- as soon as you can afterwards, make a detailed record of the conversation using the child's own language – include any questions you may have asked
- Do not add any opinions or interpretations

N.B. It is not education staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

Immediately afterwards

You must not deal with this yourself. Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Head Teacher or the DSL.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from your Designated Safeguarding Lead or Head Teacher.

Appendix 3

Good Practice Guideline for Staff

- In the event of any injury to a child, accident or otherwise, ensure that this is recorded and the recording witnessed and countersigned by another adult (usually a senior member of staff).
- Record using school's My Concern electronic system, allegations that a child may make against a staff member, e.g., 'You are always picking on me', noting the circumstances (who was present and what actually happened). Some of these allegations will be false allegations and it is important to note witnesses and facts.
- If the allegation is a serious one, it should be brought **immediately** to the attention of the Designated Child Protection and Safeguarding Officer.
- If a child touches a member of staff in a sexually inappropriate way, record what happened and ensure that another adult knows. The touch could be an innocent one, but it must be made clear that the child must not touch in that way/place.
- Do not spend an excessive amount of time with one child away from other people. If working in a 1:1 situation, ensure that the door stays open.
- Always tell another member of staff if an individual is working/going with a child on their own.
- As far as possible, ensure that another member of staff is present or aware when personal care is given to a child. Encourage children to do as much as possible for themselves within the limits of their ability.
- Staff must be mindful of how and where children are touched.
- Do not allow children to kiss, especially on the mouth.
- A risk assessment should be carried out on children who are exhibiting serious behaviour difficulties, especially before deciding whether it is appropriate to take them out of school and what level of staffing is required.
- Physical restraint should be used only when there is a risk of harm or serious harm to the child and his/her peers, and then, only in accordance with guidelines on how to hold. Any physical restraint used should be reported to the Headteacher, who will complete the appropriate restraint forms. Staff should ensure that they are familiar with the school's use of restraint policy.

- Always discuss any suspicions of inappropriate behaviour or abuse with the Designated Members of Staff for Child Protection and Safeguarding. Do not keep information to yourself. This includes inappropriate use of school equipment (video cameras, digital cameras, internet, laptops, etc). Staff should ensure that they are familiar with the school's E-Safety Policy and procedures.
- Adhere to the good practice guidelines regarding the intimate care of children.

N.B. Breaches of the above guidelines will be addressed by management and may involve the use of disciplinary procedures.

Appendix 4

Allegations about a member of staff, governor or volunteer

Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**

For example, the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or inappropriate physical handling.

- **Emotional**

For example, intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality. Excessive or aggressive shouting

- **Sexual**

For example, sexualised behaviour towards peers, sexual harassment, sexual communication including via social networking, email, text, grooming behavior, sexual assault and rape.

- **Neglect**

For example, failing to act to protect a child or children, failing to seek medical attention or failure to meet a child's basic needs

- **May Pose a Risk**

Behaviours that may take place outside of the workplace that present a transferable risk in their professional role with children. For example, alleged perpetrator of domestic abuse, offences demonstrating a sexual interest in children, abuse or neglect of their own children or behaviours that are incompatible with a professional role working with children.

If a child makes an allegation or raises a concern about a member of staff, governor, visitor or volunteer the Head Teacher should be informed immediately. If the allegation or concern fall within the following criteria the LADO will be contacted at the earliest possible opportunity and within 1 working day.

- behaved in a way that has harmed a child or may have harmed a child
- possibly committed a criminal offence against or related to a child; or
- behaved in a way that indicates s/he may pose a risk of harm to children

The Head Teacher will not carry out the investigation him/herself or interview pupils.

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries or if a child makes an allegation of sexual abuse against an

adult that works with children, Child Protection procedures will be followed and a referral made to the Multi Agency Safeguarding Hub. The LADO will also be informed.

The Head Teacher must exercise, and be accountable for, their professional judgement on the action to be taken, as follows:

- If the actions of the member of staff, are felt likely to fall within the scope of the interagency allegation management procedures 2, the Head Teacher will notify the Local Authority Designated Officer (LADO). The LADO will liaise with the Head Teacher and advise about action to be taken which will be in accordance with the interagency procedures for managing allegations.
- If the Head Teacher is uncertain whether the concern or allegation falls within the scope of the allegation management procedures a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.
- Where an allegation has been made against the Head Teacher, the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the Section on Allegations against Staff and Volunteers in the procedures of the HSCP.

Suspension of the accused until the case is resolved

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.

- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

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

requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

Where the police are involved, wherever possible the governing board 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 staff

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be

asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

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

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

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

Record-keeping

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

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

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

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

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

References

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

Learning lessons

After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the 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.

Appendix 5

Indicators of Vulnerability to Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Government in the Prevent Strategy as:

- Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Extremism is defined by the Crown Prosecution Service as:

The demonstration of unacceptable behaviour by using any means or medium to express views which:

- encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
- seek to provoke others to terrorist acts
- encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
- foster hatred which might lead to inter-community violence in the UK

There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences. Most individuals, even those who hold radical views, do not become involved in violent extremist activity.

Children may become susceptible to radicalisation through a range of social, personal and environmental factors. It is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- identity crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- personal crisis – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- personal circumstances – migration; local community tensions; and events affecting the child’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life;
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration;

- Special Educational Need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters;
- accessing violent extremist websites, especially those with a social networking element;
- possessing or accessing violent extremist literature;
- using extremist narratives and a global ideology to explain personal disadvantage;
- justifying the use of violence to solve societal issues;
- joining or seeking to join extremist organisations; and
- significant changes to appearance and / or behaviour;
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Mixed, Unclear, Unstable ideology (MUU) is a category within the Prevent system, introduced in 2017/18 and designed to distinguish from those cases in which an individual's ideology is obvious, well-embedded and appears to be the primary factor drawing them towards TACT offences. It describes what appears to be an increasingly common phenomenon where individuals do not have a well-defined or well-understood ideological motivation. These individuals often seem drawn towards acts of extremism, extremist or terrorist groups or causes, or terrorist violence, as a means of providing them with a 'solution' to other problems in their lives. They commonly present with multiple and complex vulnerabilities.

Mixed: individuals who show interest in several (sometimes disparate) ideologies simultaneously. For example, a joint interest in right-wing extremism and involuntary celibate ("incel") content or Islamist extremism and white supremacy.

Unstable: individuals who initially appear to adhere solely to one ideology but then switch or transition to another.

Unclear: individuals whose ideological influences are less coherent and not easily identifiable. This can include individuals motivated by a hatred of a 'perceived other' without relating to prominent, well-known forms of extremism. This includes but is not limited to those who appear fixated with mass violence, such as school shootings and incels, whose intolerance is predominantly directed at women.

Individuals referred for MUU display a variety of characteristics, including: an interest in multiple extremist ideologies in parallel, e.g., Islamic extremism and white supremacy; switching from one ideology to another over time; targeting a 'perceived other' of some kind without specifically identifying with a particular cause; obsession with massacre or mass violence without a particular target group; and vulnerability to being drawn into terrorism out of a desire for belonging or elevated social state.

Appendix 6

Female Genital Mutilation (FGM)

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse. It is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

Effects of FGM

There are no health benefits to FGM and it can cause serious harm, including:

- constant pain;
- pain and/or difficulty having sex;
- repeated infections, which can lead to infertility;
- bleeding, cysts and abscesses;
- problems passing urine or incontinence;
- depression, flashbacks and self-harm;
- problems during labour and childbirth, which can be life-threatening for mother and baby.

Some girls die from blood loss or infection as a direct result of the procedure.

Why FGM is carried out?

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way, for example, as a preparation for marriage or to preserve her virginity.

However, there are no acceptable reasons that justify FGM. It is a harmful practice that is not required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM. FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it is carried out.

Where FGM is carried out?

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays as this allows more time for them to "heal" before they return to school.

Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan
Ethiopia	Somalia	Gambia	Sierra Leone
Guinea	Nigeria	Indonesia	Mali
Ivory Coast	Malaysia	Kenya	Liberia

The Law and FGM

FGM is illegal in the UK.

It is an offence to:

- perform FGM (including taking a child abroad for FGM);
- help a girl perform FGM on herself in or outside the UK;
- help anyone perform FGM in the UK;
- help anyone perform FGM outside the UK on a UK national or resident;
- fail to protect a girl for whom you are responsible from FGM.

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover, either through disclosure by the victim or visual evidence, that FGM appears to have been carried out on a girl under 18.

Possible signs and indicators of FGM

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing;
- spend longer than normal in the bathroom or toilet;
- have unusual behaviour after an absence from school or college;
- be particularly reluctant to undergo normal medical examinations;
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

These signs MAY indicate a girl is at risk of FGM:

- Parents requesting additional periods of leave around school holiday times.
- If the girl comes from a country with a high prevalence of FGM.
- Mother and siblings have undergone FGM.
- Child may indicate that they are going for a special event.

Further information can be obtained [for FGM guidance](#).

Appendix 7

Safeguarding in Specific Circumstance: Youth Produced Sexual Imagery

Youth produces sexual imagery is the sending or posting of sexually suggestive images, including nude or semi-nude photographs via mobile devices or the internet by under 18s.

This includes:

- a person under 18 creating a sexual image of themselves and sharing it with another person under 18;
- a person under 18 sharing an image of another person under 18 with another person under 18 or an adult;
- a person under 18 in possession of sexual imagery created by another person under 18.

It does not include:

- a person under 18 sharing adult pornography;
- a person under 18 sharing sexual texts without sexual imagery;
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

The Law

“Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you’re under 18.”

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person;
- a topless girl;
- an image which displays genitals; and
- sex acts including masturbation;
- indecent images may also include overtly sexual images of young people in their underwear.

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support and safeguarding not criminalisation.

The National Police Chief’s Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the Police may need to be involved in cases to ensure that there is a thorough investigation including collection of evidence.

If a young person has shared imagery consensually, such as when in a romantic relationship or as a joke, and there is no intended malice it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else's imagery without consent and with malicious intent, should generally be referred to police and/or children's social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police

Assessing the Risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks. When assessing the risks, the following should be considered:

- why was the imagery shared?
- was the young person coerced or put under pressure to produce the imagery?
- who has shared the imagery?
- where has the imagery been shared?
- was it shared and received with the knowledge of the pupil in the imagery?
- are there any adults involved in the sharing of the imagery?
- what is the impact on the young people involved?
- do the young people involved have additional vulnerabilities?
- does the young person understand consent?
- has the young person taken part in this kind of activity before?

Informing Parents (or Carers)

Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases, DSLs may work to support the young people to inform their parents themselves.

Searching Devices, Viewing and Deleting Imagery

Viewing the Imagery

Adults should not view youth produced sexual imagery, unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies, i.e., it is not possible to establish the facts from the young people involved;
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report;
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network.

If it is necessary to view the imagery, the DSL should:

- never copy, print or share the imagery; this is illegal;
- discuss the decision with the Headteacher;
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher;
- ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team;
- this staff member does not need to view the images;
- wherever possible, ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office;
- wherever possible, ensure that images are viewed by a staff member of the same sex as the young person in the imagery;
- record the viewing of the imagery in the school's safeguarding records, including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed.

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If, during a search, a teacher finds material which concerns them and they reasonably suspect the material has been, or could be, used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the DfE Searching, Screening and Confiscation advice. Please note, this advice is for schools only.

Appendix 8

Safeguarding in Specific Circumstances: Gang Involvement

There are particular risk factors and triggers that young people experience in their lives that can lead to them becoming involved in gangs. Many of these risk factors are similar to involvement in other harmful activities such as youth offending or violent extremism.

Risk indicators may include:

- becoming withdrawn from family;
- sudden loss of interest in school - decline in attendance or academic achievement;
- starting to use new or unknown slang words;
- holding unexplained money or possessions;
- staying out unusually late without reason;
- sudden change in appearance - dressing in a particular style or 'uniform';
- dropping out of positive activities;
- new nickname;
- unexplained physical injuries;
- graffiti style tags on possessions, school books, walls;
- constantly talking about another young person who seems to have a lot of influence over them;
- broken off with old friends and hanging around with a new group;
- increased use of social networking sites;
- starting to adopt codes of group behaviour, e.g., ways of talking and hand signs;
- expressing aggressive or intimidating views towards other groups of young people some of whom may have been friends in the past;
- being scared when entering certain areas;
- being concerned by the presence of unknown youths in their neighbourhood.

This is not an exhaustive list and should be used as a guide. It should be amended as appropriate in light of local knowledge of the risk factors in a particular area.

Appendix 9

Safeguarding in Specific Circumstances: Child Sexual Exploitation

Child sexual exploitation takes different forms - from a seemingly 'consensual' relationship where sex is exchanged for attention, affection, accommodation or gifts, to serious organised crime and child trafficking. Child sexual exploitation involves differing degrees of abusive activities, including coercion, intimidation or enticement, unwanted pressure from peers to have sex, sexual bullying (including cyber bullying), and grooming for sexual activity. There is increasing concern about the role of technology in sexual abuse, including via social networking and other internet sites and mobile phones. The key issue in relation to child sexual exploitation is the imbalance of power within the 'relationship'. The perpetrator always has power over the victim, increasing the dependence of the victim as the exploitative relationship develops.

Many children and young people are groomed into sexually exploitative relationships but other forms of entry exist. Some young people are engaged in informal economies that incorporate the exchange of sex for rewards such as drugs, alcohol, money or gifts. Others exchange sex for accommodation or money as a result of homelessness and experiences of poverty. Some young people have been bullied and threatened into sexual activities by peers or gangs which is then used against them as a form of extortion and to keep them compliant.

The key indicators of child sexual exploitation include:

Health

- physical symptoms (bruising suggestive of either physical or sexual assault)
- chronic fatigue
- recurring or multiple sexually transmitted infections
- pregnancy and/or seeking an abortion
- evidence of drug, alcohol or other substance misuse
- sexually risky behaviour.

Education

- truancy / disengagement with education or considerable change in performance at school.

Emotional and Behavioural Issues

- volatile behaviour exhibiting extreme array of mood swings or use of abusive language
- involvement in petty crime such as shoplifting, stealing
- secretive behaviour
- entering or leaving vehicles driven by unknown adults

- reports of being seen in places known to be used for sexual exploitation, including public toilets known for cottaging or adult venues (pubs and clubs).

Identity

low self-image, low self-esteem, self-harming behaviour, e.g. cutting, overdosing, eating disorder, promiscuity.

Relationships

- hostility in relationships with staff, family members as appropriate and significant others
- physical aggression
- Placement breakdown
- reports from reliable sources (e.g. family, friends or other professionals) suggesting the likelihood of involvement in sexual exploitation
- detachment from age-appropriate activities
- associating with other young people who are known to be sexually exploited
- known to be sexually active
- sexual relationship with a significantly older person, or younger person who is suspected of being abusive
- unexplained relationships with older adults
- possible inappropriate use of the Internet and forming relationships, particularly with adults, via the Internet
- phone calls, text messages or letters from unknown adults
- adults or older youths loitering outside the home
- persistently missing, staying out overnight or returning late with no plausible explanation
- returning after having been missing, looking well cared for in spite of having no known home base
- missing for long periods, with no known home base
- going missing and being found in areas where they have no known links.

Please Note: Whilst the focus is often on older men as perpetrators, younger men and women may also be involved and staff should be aware of this possibility.

Social Presentation

- change in appearance
- going out dressed in clothing unusual for them (inappropriate for age, borrowing clothing from older young people).

Family and Environmental Factors

- history of physical, sexual, and/or emotional abuse; neglect; domestic violence; parental difficulties.

Housing

- pattern of previous street homelessness
- having keys to premises other than those known about.

Income

- possession of large amounts of money with no plausible explanation
- acquisition of expensive clothes, mobile phones or other possessions without plausible explanation
- accounts of social activities with no plausible explanation of the source of necessary funding.

This list is not exhaustive.

Modern Slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour.

Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance.

Modern slavery: how to identify and support victims - GOV.UK (www.gov.uk).

Appendix 10

Operation Encompass

Operation Encompass operates in all police forces across England. The process helps to support schools in providing emotional and practice help to children.

Where police attend an incident of domestic abuse, whereby children live within the household, a notification will be sent to the child's school the following day to notify the school of the incident. The information provided to the school ensures that the school have up to date information for children who have experienced a domestic abuse incident within the home. Schools can use this information to provide further wellbeing support internally.

Should the school feel the information provided to them, provides additional concern to existing concerns or worries, the school as per the local safeguarding procedures must be a referral into the Multi Agency Safeguarding Hub. Operation Encompass does not replace statutory safeguarding procedures.

National Domestic Abuse Helpline Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safelives; domestic abuse and young people](#)
- [Domestic abuse specialist sources for support](#)
- [Home: Operation Encompass](#)

Appendix 11

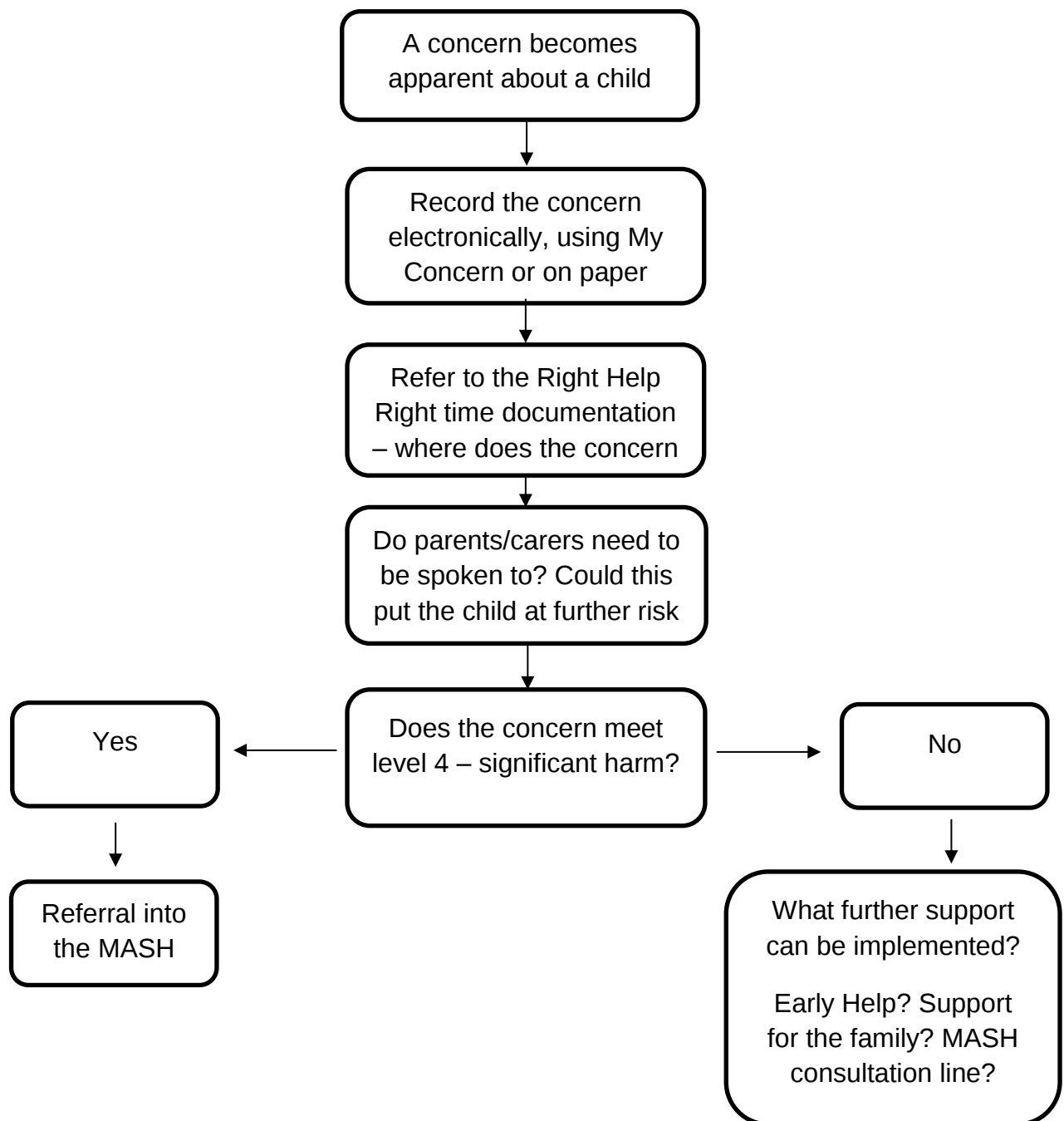
Information Sharing advice for practitioners providing safeguarding services to children, young people, parents and carers July 2018

This HM Government advice is non-statutory and has been produced to support practitioners in the decisions they take to share information, which reduces risk of harm to children and young people and promotes their well-being.

This guidance does not deal with policies for bulk or pre-agreed sharing of personal information between IT systems or organisations other than to explain their role in effective information governance.

This guidance has been updated to reflect the [General Data Protection Regulation \(GDPR\) and Data Protection Act 2018](#), and it supersedes the [HM Government Information sharing guidance for practitioners and managers](#) published in March 2018. [The information sharing advice for practitioners providing safeguarding services to children, young people, parents and carers 2018 is listed for further reference.](#)

Model Setting Concern Process 2021



The Brook Traffic Light Tool Behaviours 0 – 5 Years



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 0 to 5 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

● Green behaviours

- holding or playing with own genitals
- attempting to touch or curiosity about other children's genitals
- attempting to touch or curiosity about breasts, bottoms or genitals of adults
- games e.g. mummies and daddies, doctors and nurses
- enjoying nakedness
- interest in body parts and what they do
- curiosity about the differences between boys and girls

● Amber behaviours

- preoccupation with adult sexual behaviour
- pulling other children's pants down/skirts up/trousers down against their will
- talking about sex using adult slang
- preoccupation with touching the genitals of other people
- following others into toilets or changing rooms to look at them or touch them
- talking about sexual activities seen on TV/online

● Red behaviours

- persistently touching the genitals of other children
- persistent attempts to touch the genitals of adults
- simulation of sexual activity in play
- sexual behaviour between young children involving penetration with objects
- forcing other children to engage in sexual play

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.



SEXUAL BEHAVIOURS

●●● TRAFFIC LIGHT TOOL

Behaviours: age 5 to 9 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

● Green behaviours

- feeling and touching own genitals
- curiosity about other children's genitals
- curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- sense of privacy about bodies
- telling stories or asking questions using swear and slang words for parts of the body

● Amber behaviours

- questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- sexual bullying face to face or through texts or online messaging
- engaging in mutual masturbation
- persistent sexual images and ideas in talk, play and art
- use of adult slang language to discuss sex

● Red behaviours

- frequent masturbation in front of others
- sexual behaviour engaging significantly younger or less able children
- forcing other children to take part in sexual activities
- simulation of oral or penetrative sex
- sourcing pornographic material online

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.



SEXUAL BEHAVIOURS

● ● ● TRAFFIC LIGHT TOOL

Behaviours: age 9 to 13 years

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

● Green behaviours

- solitary masturbation
- use of sexual language including swear and slang words
- having girl/boyfriends who are of the same, opposite or any gender
- interest in popular culture, e.g. fashion, music, media, online games, chatting online
- need for privacy
- consensual kissing, hugging, holding hands with peer

● Amber behaviours

- uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- exhibitionism, e.g. flashing or mooning
- giving out contact details online
- viewing pornographic material
- worrying about being pregnant or having STIs

● Red behaviours

- exposing genitals or masturbating in public
- distributing naked or sexually provocative images of self or others
- sexually explicit talk with younger children
- sexual harassment
- arranging to meet with an online acquaintance in secret
- genital injury to self or others
- forcing other children of same age, younger or less able to take part in sexual activities
- sexual activity e.g. oral sex or intercourse
- presence of sexually transmitted infection (STI)
- evidence of pregnancy

What is green behaviour?

Green behaviours reflect safe and healthy sexual development. They are:

- displayed between children or young people of similar age or developmental ability
- reflective of natural curiosity, experimentation, consensual activities and positive choices

What is amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be:

- unusual for that particular child or young person
- of potential concern due to age, or developmental differences
- of potential concern due to activity type, frequency, duration or context in which they occur

What is red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be:

- excessive, secretive, compulsive, coercive, degrading or threatening
- involving significant age, developmental, or power differences
- of concern due to the activity type, frequency, duration or the context in which they occur

What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

What can you do?

Red behaviours indicate a need for immediate intervention and action.

Safer Recruitment and DBS Checks – Policy and Procedures

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

New Staff

When appointing new staff, we will:

- verify their identity;
- obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months;
- obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available;
- verify their mental and physical fitness to carry out their work responsibilities;
- verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards;
- verify their professional qualifications, as appropriate;
- ensure they are not subject to a prohibition order if they are employed to be a teacher;
- carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

The references requested will ask specific questions about the suitability of the applicant to work with children.

Regulated activity means a person who will be:

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing Staff

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

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

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

Agency and Third-Party Staff

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

Contractors

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

- an enhanced DBS check with barred list information for contractors engaging in regulated activity;
- an enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

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

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

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

Trainee / Student Teachers

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

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

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

Volunteers

We will:

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

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

Appendix 15: Prevent in Education Risk Assessment and Practice Action Plan

	YES	NO	Existing Controls	Further Action	Staff responsible	Due Date
Does your Safeguarding Policy make explicit that the school sees protection from radicalisation and extremist narratives as a safeguarding issue?						
Are the Lead Preventive responsibilities clearly identified in the policy?						
Prevent Single Point of Contact (SPOC)/ Safeguarding Lead						
Governor Safeguarding Lead						
Does Policy make explicit how PREVENT concerns should be reported within school?						
Prevent and Fundamental British Values considered in curriculum planning						
Does the school have clear guidance for visitors including faith related visiting speakers?						
Checks for speakers/visitors to the school?						

Checks for premises use by externals?						
Have ALL staff received appropriated training on PREVENT such as WRAP (Workshop to Raise Awareness of PREVENT)?						
Does this include support staff?						
Are there provisions for new staff induction?						
Have Governors received a Governor PREVENT briefing?						
Do all staff know what to do if they have a PREVENT concern and to whom to report it?						
	YES	NO	Comment/Evidence	Further Action	Staff responsible	Due Date
Does the E-Safety Policy refer to the requirements of the Prevent guidance?						
Appropriate filtering is in place to ensure that staff and children are unable to access unauthorised or extremist websites online through school systems						

Protocols in place to manage the layout, access and use of any space provided for the purposes of prayer and Faith Facilities.						
Clear guidance on governing the display of materials internally at the school						