



DUDLEY ACADEMIESTRUST

Child Protection and Safeguarding

Issue number:	005
Responsible:	Compliance Officer
Approved by:	Board of Trustees
Date:	July 2022
Review date:	July 2023



Sponsored by
Dudley College of Technology



Child Protection & Safeguarding Policy

School Name:	Kates Hill Primary
Headteacher:	Louise Woodhouse
Designated Safeguarding Lead:	Louise Woodhouse
Deputy Designated Safeguarding Leads:	Margret Hollis Lee Waterfield Daniel Cox Melissa
Trust Safeguarding Lead:	Pat Hazelhurst
Date Last Reviewed:	July 2022
Date Next Review Due:	July 2023
Safeguarding Designated Officer:	Jane Dickens (Interim)
Local Authority Designated Officer:	Yvonne Nelson-Brown and Valerie Wilmot
Dudley Academies Trust Chief Executive Officer:	Jo Higgins



Sponsored by
Dudley College of Technology



Contents

Aims.....	7
Legislation and Statutory Guidance.....	7
Definitions.....	8
Equality Statement.....	9
Roles and Responsibilities.....	10
All Staff.....	10
The Designated Safeguarding Lead (DSL).....	11
Deputy Designated Safeguarding Leads.....	12
The Board of Trustees.....	12
The Headteacher.....	13
Virtual School Heads.....	14
Multi-agency Working.....	14
Checking the Identity and Suitability of Visitors.....	15
Information Sharing and Confidentiality.....	15
Recognising Abuse and Taking Action.....	17
A Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger.....	18
A Child Makes a Disclosure to You.....	18
Out of Hours' Disclosures.....	19
Serious Violence Including Knife Crime.....	20
If You Discover That Female Genital Mutilation (FGM) Has Taken Place or a Pupil Is at Risk of FGM.....	20
Concerns about a Child (As Opposed to Believing a Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger).....	21
Early Help.....	22
Referrals.....	22
Section 47 Referrals.....	23
Section 17 Referrals.....	23
Concerns about Extremism.....	24
Concerns about Mental Health.....	26
Concerns about a Staff Member (Including Supply Staff, Volunteer or Contractor).....	26
Allegations of Abuse Made Against Other Pupils.....	26
Sharing of Nudes and Semi-Nudes ('Sexting').....	28
Your Responsibilities when Responding to an Incident.....	28
Further Review by the DSL.....	31

Searching, Screening and Confiscation	31
On-line Safety	31
Remote Learning	33
Notifying Parents/Carers	34
Pupils with Special Educational Needs and Disabilities	35
Pupils with a Social Worker	35
Looked-After and Previously Looked-After Children.....	36
Mobile Phones and Cameras.....	36
Staff Misuse	37
Complaints and Concerns about School Safeguarding Policies.....	37
Complaints against Staff.....	37
Other Complaints	37
Whistleblowing.....	37
Record-Keeping	38
Training	39
All Staff.....	39
The DSL and Deputy/Deputies	39
Local Advisory Committee	40
Recruitment – Interview Panels.....	40
Staff Who Have Contact with Pupils and Families	40
Monitoring Arrangements	40
Links with other policies	41
Appendix 1: Types of Abuse	42
Physical Abuse.....	42
Emotional Abuse	42
Sexual Abuse	42
Neglect	42
Child on Child Abuse.....	43
Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures.....	46
Recruitment and Selection Process	46
Pre-appointment Vetting Checks	48
New Staff.....	48
Regulated Activity	49
Existing Staff.....	50
Agency and Third-Party Staff.....	50



Sponsored by
Dudley College of Technology



Contractors	50
Trainee/Pupil Teachers	51
Volunteers	51
Trustees/Local Advisory Committee Members	51
Associate Members.....	52
Staff Working in Alternative Provision Settings	52
Adults Who Supervise Pupils on Work Experience	52
Pupils Staying with Host Families.....	52
Appendix 3: Allegations of Abuse Made Against Staff.....	53
Section 1: Allegations that May Meet the Harms Threshold	53
Suspension of the Accused Until the Case Is Resolved.....	53
Definitions for Outcomes of Allegation Investigations.....	54
Procedure for Dealing with Allegations.....	54
Timescales.....	56
Specific Actions.....	56
References	58
Learning Lessons	58
Non-Recent Allegations.....	59
Section 2: Concerns That Do Not Meet the Harm Threshold.....	59
Appendix 4 – Specific Safeguarding Issues	62
Child Abduction and Community Safety Incidents.....	62
Children and the Court System.....	62
Children with Family Members in Prison.....	62
Children Missing from Education.....	62
Elective Home Education (EHE)	63
Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE).....	63
County Lines	65
Modern Slavery and the National Referral Mechanism	66
Cybercrime.....	66
Domestic Abuse	66
Homelessness.....	68
So-Called ‘Honour-Based’ Abuse (Including FGM and Forced Marriage).....	68
Preventing Radicalisation	70
The Prevent Duty (Radicalisation and Extremism).....	72
Sexual Violence and Sexual Harassment between Children in Schools	75



Sponsored by
Dudley College of Technology



Serious violence.....	77
Responding to Reports of Sexual Violence or Sexual Harassment	77
The Response to a Report of Sexual Violence or Sexual Harassment.....	77
Confidentiality and Information Sharing.....	78
Risk Assessment.....	79
Action Following a Report of Sexual Violence and/or Sexual Harassment	79
Childhood Mental Health	81
Self-Harm and Mental Health	82
Lesbian, Gay, Bisexual and Transgender (LGBT).....	82
Looked After Children and Previously Looked After Children	82
Private Fostering.....	83
Young Carer.....	84
Teenage Pregnancy	84
Non-collection of Pupils	85
Missing Pupils.....	86
Use of Reasonable Force.....	87



Sponsored by
Dudley College of Technology



Aims

The school aims to ensure that:

- Safeguarding is of paramount importance to everyone working, attending, and visiting the school.
- Contextual safeguarding will include all aspects of school life, home environments and the wider community.
- 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.
- A safe environment is created where children can succeed and are equipped with the skills needed to keep themselves safe.
- Children that have been abused are supported through multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#) and internal intervention.

Legislation and Statutory Guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our three local safeguarding partners.

This policy is also based on the following legislation:

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



Sponsored by
Dudley College of Technology



policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children.

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR).
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Headteacher should carefully consider how they are supporting their pupils about these characteristics. The Act allows our school to take positive action to deal with disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there’s evidence that they are being disproportionately subjected to sexual violence or harassment.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination.

This policy also complies with our funding agreement and articles of association.

Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Child Protection will include the unborn child until they are 18 and 25 with SEND.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. [Appendix I](#) explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. [Appendix I](#) defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as, sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos, or live streams.

Children includes everyone under the age of 18.



Sponsored by
Dudley College of Technology



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

- The Local Authority (LA).
- A clinical commissioning group for an area within the LA.
- The Chief Officer of Police for a police area in the LA area.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

Equality Statement

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

- We consider children who have special educational needs (SEN), disabilities, or health conditions (see section '[Pupils with Special Educational Needs or Disabilities or Health Conditions](#)').
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see [Looked-After and Previously Looked-After Children section](#)).
- Are missing from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.



Sponsored by
Dudley College of Technology



Roles and Responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, (including supply staff, volunteers, members, and trustees) in the school and is consistent with the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy.
- Pastoral support system.
- Planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships.
 - Boundaries and consent.
 - Stereotyping, prejudice, and equality.
 - Body confidence and self-esteem.
 - How to recognise an abusive relationship (including coercive and controlling behaviour).
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based abuse such as forced marriage and female genital mutilation (FGM) and how to access support.
 - What constitutes sexual harassment and sexual violence and why they are always unacceptable.

All Staff

All staff will:

- Read and understand part I and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents/carers. This includes making parents/carers aware of what we ask children to do online (e.g., sites they need to visit or who they will be interacting with online).
- Provide a safe space for pupils who are LGBT to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including this Child Protection and Safeguarding policy, the school's Disciplinary policy, the role and identity of the Designated Safeguarding Lead (DSL) and Deputy/Deputies, the Behaviour policy, the E-Safety policy, and the safeguarding response to children who go missing from education.



Sponsored by
Dudley College of Technology



- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation and serious violence (including that linked to county lines).
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

The Training section and [Appendix 4](#) of this policy outline in more detail how staff are supported to do this.

The Designated Safeguarding Lead (DSL)

The DSL lead is a member of the Senior Leadership Team and takes lead responsibility for child protection and wider safeguarding (including online safety), and will keep the Headteacher informed of any issues especially ongoing enquiries under section [47 of the Children Act 1989](#) and Police investigations. Our DSL is Margret Hollis

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Outside of school hours the Local Authority will be provided with emergency contact details for a named member of the Safeguarding Team.

When the DSL is absent, the Deputy/Deputies Margaret Hollis, Lee Waterfield and Daniel Cox will act as cover.

If the DSL and Deputy are not available, Paul Townsend will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in strategy discussions and multi-agency meetings and/or support other staff to do so.
- Contribute to the assessment of children.
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- Have a good understanding of harmful sexual behaviour.

The DSL will also:



Sponsored by
Dudley College of Technology



- Keep the Headteacher informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies.
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment and be confident as to how to access this support.
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search.

The full responsibilities of the DSL and deputies are set out in their job description.

In addition to the formal training, the DSL should:

- Ensure the school's child protection policies are known, understood, and used appropriately.
- Ensure the school's child protection and safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies regarding this.
- Ensure the child protection and safeguarding policy is available publicly and parents/carers know referrals about suspected abuse or neglect may be made and the role of the school in this.
- Link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.

The DSL lead and any deputies will liaise with the three safeguarding partners and work with other agencies in line with [Working Together to Safeguard Children](#).

Deputy Designated Safeguarding Leads

The deputy designated safeguarding leads should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

The Board of Trustees

The Board of Trustees will:

- Approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation.



Sponsored by
Dudley College of Technology



- Be aware of its obligations under the [Human Rights Act 1998](#), the [Equality Act 2010 \(including the Public Sector Equality Duty\)](#), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior board level (or equivalent) to monitor the effectiveness of this policy in conjunction with the full Board of Trustees. This is always a different person from the DSL.
- Make sure:
 - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support.
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
 - The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns.
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors).
 - That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

The Chair of Trustees will act as the 'case manager' if an allegation of abuse is made against the Headteacher, where appropriate (see [Appendix 3](#)).

All Trustees will read [Keeping Children Safe in Education](#) in its entirety.

The Training section has information on how Trustees are supported to fulfil their role.

The Headteacher

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers:
 - Are informed of our systems, which support safeguarding, including this policy, as part of their induction.
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and via the school website.
- Ensuring that the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see [Appendix 3](#)).
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- Liaising with the Local Authority Designated Officer (LADO).



Sponsored by
Dudley College of Technology



- Ensuring the relevant staffing ratios are met, where applicable.
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g., DSLs, SENCOs, social workers, mental health leads and others.

Multi-agency Working

The school plays a pivotal role in multi-agency safeguarding arrangements. The Local Advisory Committee will ensure that the school contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).

The Dudley Safeguarding People Partnership Board (DSPPB) is made up of representatives from Dudley Council, West Midlands Police, NHS and voluntary sector. The partnership arrangement reflects our legal responsibility to comply with the [Working Together to Safeguard Children](#) statutory framework and also a shared ambition and commitment to safeguard and promote the welfare of children, including identifying and responding to their needs (see [Dudley Safeguarding People Partnership Arrangements](#)).

The Black Country Child Death Overview Panel (CDOP) operates as a parallel group to the multi-agency safeguarding arrangements and has been set up by Child Death Review (CDR) Partners:

- City of Wolverhampton Council
- Dudley CCG
- Dudley Metropolitan Borough Council
- Sandwell and West Birmingham CCG
- Sandwell Metropolitan Borough Council
- Walsall CCG
- Walsall Metropolitan Borough Council
- Wolverhampton CCG

[Working Together to Safeguard Children](#) requires CDOP to oversee the review of deaths of children under the requirements of the [Children Act 2004](#) and [Working Together to Safeguard Children](#).

We work in partnership with other agencies to promote the best interests of our pupils as a top priority in all decisions and actions that affect them. The school will, where necessary, liaise with these agencies and make requests for support from children's social care. Where the child already has a safeguarding social worker or family support worker, the request for support should go immediately to the team involved, or in their absence to their team manager.



Sponsored by
Dudley College of Technology



When invited the Designated Safeguarding Lead (DSL) will participate in a MASH strategy meeting, usually by conference phone, adding school held data and intelligence to the discussion so that the best interests of the child are met.

We 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 integrated support plan meetings initial and review child protection conferences, and core group meetings.

We will provide reports as required for these meetings. If the school is unable to attend, a written report will be sent. Social Care will wherever possible, share the report with parents/carers at least 24 hours prior to the meeting.

Where a pupil is subject to an inter-agency child protection plan or a multi-agency risk assessment conference (MARAC) meeting, the school will contribute to the preparation, implementation, and review of the plan as appropriate.

Checking the Identity and Suitability of Visitors

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

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

Visitors are expected to sign in and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the local authority or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been conducted (if this is provided, we will not ask to see the DBS certificate).

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

Visitors working directly with children will have different coloured lanyards to visitors having no unsupervised contact with children. This makes it easier for staff and children to challenge visitors.

Information Sharing and Confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect.

Staff should be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is



Sponsored by
Dudley College of Technology



when problems are first emerging, or where a child is already known to the local authority children's social care.

The [Data Protection Act 2018](#) and the [GDPR](#) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

Staff should have due regard to the relevant data protection principles which allow them to share (and withhold) personal information, as provided for in the [Data Protection Act 2018](#) and the [GDPR](#). This includes:

- Being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be 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 academies, 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 Protect Act 2018](#) and the GDPR. Where in doubt seek independent legal advice.

Further details on information sharing can be found:

- In Chapter one of [Working Together to Safeguard Children](#), which includes a myth-busting guide to information sharing.
- At [Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#). The seven golden rules for sharing information will be especially useful.
- At [The Information Commissioner's Office \(ICO\)](#), which includes ICO GDPR FAQs and guidance from the department.
- In [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.

We recognise that all matters relating to child protection are confidential and note that:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- [The Data Protection Act \(DPA\) 2018](#) and [GDPR](#) do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the [DPA 2018](#) contains 'safeguarding of children and individuals at risk as a processing condition that allows



Sponsored by
Dudley College of Technology



practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- Staff should never promise a child that they would not tell anyone about a report of abuse, as this might not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the UK GDPR that applies.
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
 - The DSL should consider that:
 - Parents/carers should normally be informed (unless this would put the victim at greater risk).
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy).
- Confidentiality is also addressed in this policy with respect to record keeping, and allegations of abuse against staff in [Appendix 3](#).

Recognising Abuse and Taking Action

Safeguarding and promoting the welfare of children 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



Sponsored by
Dudley College of Technology



centred. This means that they should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

Safeguarding and promoting the welfare of children is defined as:

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

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school 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 abuse or exploitation in situations outside 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 violence.

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

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

A Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger

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

Tell the DSL as soon as possible if you make a referral directly.

You can also report child abuse to your Local Authority [here](#).

In addition, all West Midlands local authorities Child Protection and Safeguarding Procedures manual can be accessed [here](#).

A Child Makes a Disclosure to You

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.



Sponsored by
Dudley College of Technology



- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly and tell the DSL as soon as possible that you have done so.

Bear in mind that some children may:

- Not feel ready or know how to tell someone that they are being abused, exploited, or neglected.
- Not recognise their experiences as harmful.
- Feel embarrassed, humiliated, or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers.

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

Staff must **immediately** discuss any concerns or disclosures, in the first instance, directly with the DSL. If staff are teaching, they must, **immediately**, call for support in conveying the disclosure to the DSL. It is not permitted to send disclosures via email, to protect the risk of accidentally sending confidential/sensitive information to an incorrect recipient.

Out of Hours' Disclosures

If a disclosure happens whilst on a school trip:

If during the school day:

- Follow the usual procedure for safeguarding but call the base contact and ask to speak to the DSL immediately and relay the information over the telephone for advice.

If during the evening or out of school hours:

- Call the emergency contact on the risk assessment and inform them – this is usually the Headteacher
- Follow the usual process with regard to writing down the disclosure
- If the child is in immediate danger or the child is not safe to return home or you feel they would be at risk of harm if they went home, then contact 999. Ensure the child is kept safe with a member of staff whilst you do this. If you are unsure contact the MASH for advice (ask the child their address, and call the appropriate MASH according to where they live)
- **DO NOT** let the child leave the school with anyone if you are concerned about their welfare. Take advice from MASH/Police/Base Contact.

Dudley MASH



Sponsored by
Dudley College of Technology



MASH number 0300 555 0050 (9:00am-5:00pm) or 0300 555 8574 (out of hours).

All partners and providers are now expected to submit social care or early help referrals via the [Dudley Social Care and Early Help Portal](#).

Sandwell MASH

MASH Number 0121 569 3100 – this is for both office hours and out of hours.

MARF Form - <https://www.sandwellcsp.org.uk/key-safeguarding-issues/report-a-concern/>.

Wolverhampton Mash

MASH number – 01902 555 392 (8:30am-5:00pm) or 01902 552 999 (out of hours).

MARF Form - <https://marf.wolverhampton.gov.uk/>.

Serious Violence Including Knife Crime

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence from school.
- A change in friendships or relationships with older individuals or groups.
- A significant decline in performance.
- Signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries.
- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. Advice for schools and colleges 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. A report instigated by Ofsted [Knife Crime: Safeguarding Children and Young People in Education](#) addresses some of the factors that can contribute to keeping children safe from crime and recommendations in an attempt to overcome some of the challenging issues.

If You Discover That Female Genital Mutilation (FGM) Has Taken Place or a Pupil Is at Risk of FGM

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

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

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a learner may be at risk, are set out in [Appendix 4](#).



Sponsored by
Dudley College of Technology



Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

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

Concerns about a Child (As Opposed to Believing a Child Is Suffering or Likely to Suffer from Harm, Or in Immediate Danger)

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

Make a referral to Local Authority children's social care directly, if appropriate (see '[Referral](#)' below). Share any action taken with the DSL as soon as possible.



Sponsored by
Dudley College of Technology



Early Help

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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

The Early Help Assessment forms are a key part of the Early Help Strategy and is a simple way to help identify the needs of children, young people and their families and plan to meet those needs. It is designed to be a shared tool, which can be used by all agencies in Dudley who are delivering early help. It is a standardised approach so that all children and families have the same experience of identifying their needs, strengths, and challenges. It also means that all agencies and partners are operating the same system, which ensures consistency right across the partnership. Parents/carers will give both verbal and written consent. The completed forms will be submitted via the Dudley Children's Portal.

The approach of early identification puts children and young people at the heart of the assessment and will prevent issues escalating to statutory services.

It is vital that all staff are aware of the Early Help Procedure and the support that is available for our families ([KCSIE](#)). To do this most effectively, all staff receive training and regular updates on the Early Help process.

The DSL or Deputy DSL will attend the Multi Agency Allocation Meetings (MAAM) at the Family Centre to assess the case against threshold. In the event of the DSL or Deputy DSL being unable to attend the meeting a MAAM Partnership Proforma must be completed. Staff from the school will attend all Early Help meetings and contribute to the Support Plan, reviewing and taking the role of Lead Professional when required. The DSL will attend bi-annual strategic reviews with the Local Authority regarding the Early Help provision.

The DSL will follow the guidelines set out in the [Dudley Early Help Strategy 2021-2024](#).

Referrals

When making a referral, have the following ready wherever possible:

- Make sure you are clear on the information you have.
- Use a telephone near a computer where possible in case you require SIMS.
- Use SIMS, if possible, to get the child's full name and date of birth and parental name and addresses.
- The MASH team of where the child lives need to be informed. Most pupils live in Dudley, but some may live in Sandwell or Wolverhampton.
- If you think, a child is in immediate danger always, call 999.

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. [NPCC](#) – When to call the police helps, DSLs understand when they should consider calling the police and what to expect when they do.

If you make a referral directly, you must tell the DSL as soon as possible.

Section 47 Referrals

A child in need of protection is described in section 47 of the Children Act 1989, Paragraph (1) and Children Act 2004.

Where a local authority has reasonable cause to suspect that a child is suffering or is likely to suffer significant harm, where the child lives or is found in the authority's area, they shall make or cause to be made, such enquiries as they consider necessary to enable them to decide whether they should take any action to safeguard or promote the child's welfare.

If a child is thought to be or has disclosed risk of significant harm, the DSL will notify the Multi-Agency Safeguarding (MASH) Team by phone immediately and then through the completion of a Multi-Agency Referral Form (MARF) submitted electronically via the [Dudley Children's Portal](#).. Parents/Carers will be notified if safe to do so, or unless advised by the MASH Team not to do so. Where necessary, the MARF may also be accompanied by a referral to the Police.

Section 17 Referrals

The definition of 'children in need' is defined by the [Children Act 1989 s17](#).

If a child is:

- Unlikely to achieve or maintain, or to have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision of services by a local authority or
- Their health or development is likely to be significantly impaired, or further impaired, without the provision for him of such services; or
- He is disabled.

If a child needs higher-level support than an Early Help Plan but is not at risk of significant harm, then a MARF will be completed with parental/carer knowledge and agreement to Children's Services.

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

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



Sponsored by
Dudley College of Technology



Concerns about Extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see '[Referral](#)' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the Local Authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergencies.

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

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

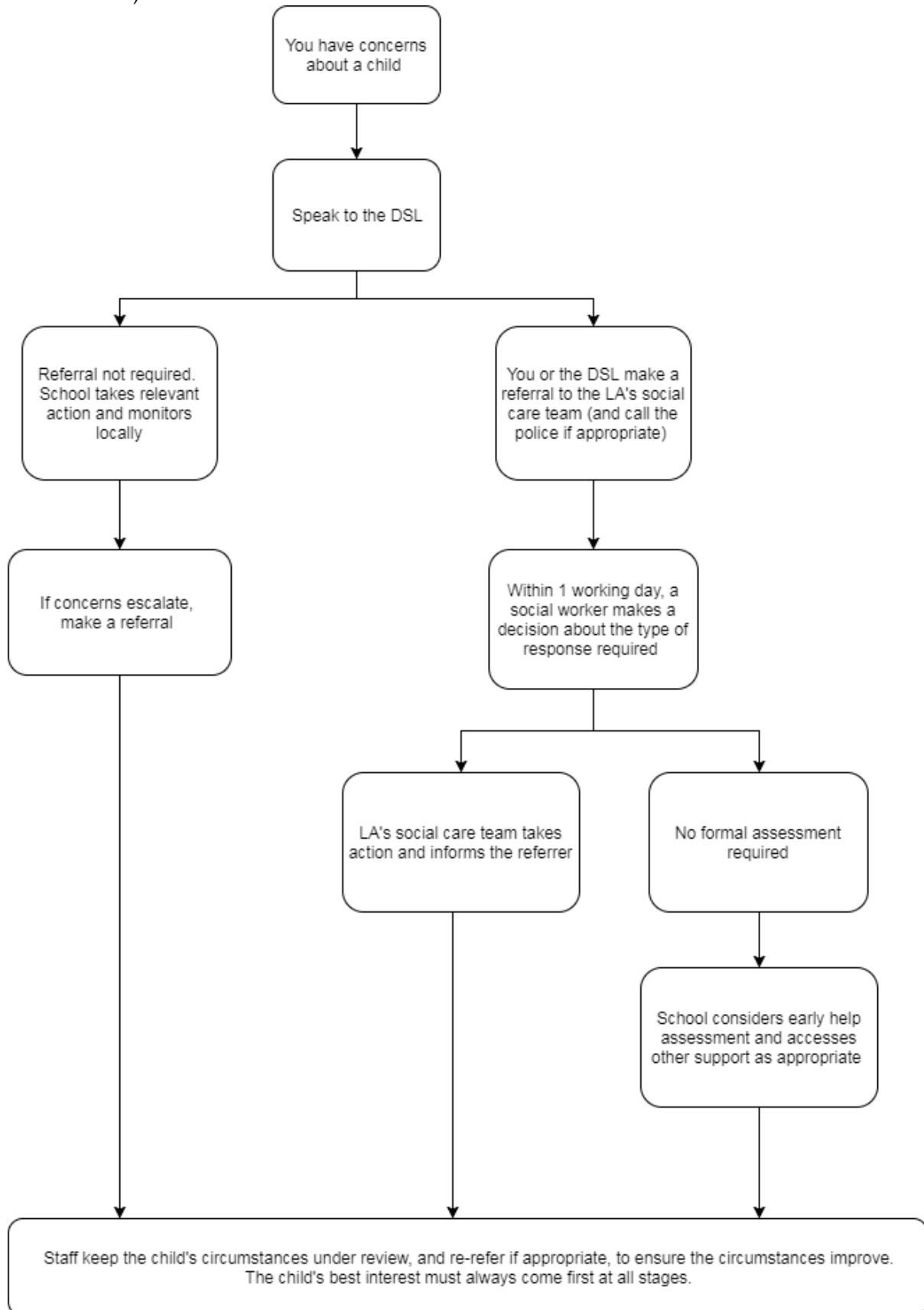


Sponsored by
Dudley College of Technology



Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See 'The Designated Safeguarding Lead' section for what to do.)



Concerns about Mental Health

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps under section '[If You Have Concerns about a Child](#)'.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. This must include informing the parent/carer and advising them to seek professional support from the families General Practitioner services or to attend Accident and Emergency departments at their local hospital, should they be concerned their child is at risk of serious harm from themselves.

Concerns about a Staff Member (Including Supply Staff, Volunteer or Contractor)

If you have safeguarding concerns, or an allegation is made about another member of staff (including a supply teacher, volunteer, or contractor) posing a risk of harm to children, then:

- This should be referred to the Headteacher as soon as possible.
- Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of the Trust Board.

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

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see [Appendix 3](#) for more detail).

Allegations of Abuse Made Against Other Pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our Behaviour Policy, but this Child Protection and Safeguarding Policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence.
- Could put pupils in the school at risk.
- Is violent.
- Involves pupils being forced to use drugs or alcohol.



Sponsored by
Dudley College of Technology



- Involves sexual exploitation, sexual abuse, or sexual harassment, such as indecent Exposure, sexual assault, upskirting, or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes).

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

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensuring pupils can easily and confidently talk to staff.
- Ensuring staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensuring that staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.

- That even if there are no reports of child-on-child abuse in the school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to.
 - A friend may make a report.
 - A member of staff may overhear a conversation.
 - A child’s behaviour might indicate that something is wrong.
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
- The important role they must play in preventing child on child abuse and responding where they believe a child may be at risk from it.
- That they should speak to the DSL if they have any concerns.
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g., by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, considering whether:

- Acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

Sharing of Nudes and Semi-Nudes (‘Sexting’)

Your Responsibilities when Responding to an Incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL).



Sponsored by
Dudley College of Technology



- Delete the imagery or ask the pupil to delete it.
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility).
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, blackmailed, or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs).
- What the DSL knows about the images or videos 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 images or videos is under 13.
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will generally be done in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made the starting point is this should be passed on to the police.

Safeguarding and supporting the victim, the alleged perpetrator(s) and other children must be an ongoing consideration (see further DfE guidance [‘Sexual violence and sexual harassment between children in schools and colleges’](#)).

A Force Intelligence Bureau (FIB) Form, also referred to as the West Midlands Police Information Report, will be used when reporting a non-urgent matter to the Police. This will include sharing information around local safety issues and exploitation.

The purpose of the FIB Form is to inform the police of any intelligence that has been gathered during day to day working. The FIB is quick and easy to complete and any information, however small, will help in intelligence gathering. There is written guidance within the form. Any information **must be sent via secure email to: fib@west-midlands.pnn.police.uk**.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.



Sponsored by
Dudley College of Technology



Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationship's education and computing programme in an age-appropriate way.

Pupils also learn the strategies and skills needed to manage:

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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

Further Review by the DSL

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

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

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

Searching, Screening and Confiscation

Where necessary, searching, screening and confiscation will be used to safeguard children in our school. We will adhere to ['Searching, Screening and Confiscation: Advice for Schools \(January 2018\)](#). Please see behaviour policy for further information on searches and confiscation.

On-line Safety

As we increasingly work online, it is essential that children be safeguarded from potentially harmful and inappropriate online material. Where children are being asked to learn online at home, the Department for Education has provided advice to support schools do so safely: [safeguarding-in-schools-colleges-and-other-providers](#) and [safeguarding-and-remote-education](#).

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation; sexual predations: technology often provides the platform that facilitates harm. Our school will endeavour to provide activities and opportunities in the PSHEE curriculum that will equip our pupils with the necessary skills they need to stay safe. This may include covering relevant issues through Relationships Education. The school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers, and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').



Sponsored by
Dudley College of Technology



- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

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

- **Content:** being exposed to illegal, inappropriate, or harmful content.
- **Contact:** being subjected to harmful online interaction with other users, such as peer-to-peer 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 increased the likelihood of, or causes harm; for example, making, sending, receiving sharing explicit images and online bullying; and
- **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams.

Child protection and wider child safety issues will be addressed through the curriculum as appropriate. Relevant issues will be addressed, for example, this may include self-esteem, emotional literacy, assertiveness, power, relationships education, online safety and bullying. The following resources are available to support schools:

- [Disrespectnobody](#) is Home Office advice and includes resources on healthy relationships, including 'sexting' and pornography.
- [Education for a connected world framework.](#)
- [PSHE Association](#) provides guidance to schools on developing their PSHE curriculum.
- [Teaching online safety in school.](#)
- [Thinkuknow](#) is the National Crime Agency/CEOPs education programme with age specific resources.
- [UK Safer Internet Centre](#) developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

This will be done broadly through PSHE, and Assemblies.

To meet our aims and address the risks above we will:

Educate pupils about online safety as part of our curriculum.

For example:

- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.



Sponsored by
Dudley College of Technology



- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings and via the weekly newsletter. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to the school for their own use, but will limit such use to non-contact time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in the school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#).
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

Remote Learning

Where pupils are being asked to learn online at home the DfE has provided advice to support schools and colleges do so safely: [safeguarding in schools colleges and other providers](#) and [safeguarding and remote education](#). The NSPCC and PSHE Association also provide helpful advice:

- NSPCC Learning - [Undertaking remote teaching safely during school closures](#).
- PSHE - [PSHE Association coronavirus hub](#).

Although we do not regularly deliver remote learning to pupils, any remote lessons are delivered via Microsoft Teams. A safeguarding monitoring software called 'Senso' is in place during every remote lesson to always ensure maximum protection for pupils and staff.

Additional Support

The School is committed to providing the earliest levels of support. Safeguarding issues that do not meet Threshold for outside agency support will be offered a wide range of help in school. Intervention work will be recorded and the data used to track trends and vulnerable groups. Intervention will also take form of preventative and educational workshops, small group work and 1:1 session.



Sponsored by
Dudley College of Technology



These will include:

1:1 Mentoring

1:1 Mentoring is a referral-based intervention for identified pupils requiring longer-term support provided by the school's Mental Health First Aiders in the first instance.

Emotional Well-being

Self – harming behaviour will automatically be referred to the Educational Psychologist and the child's GP for assessment via the safeguarding route. Pupils experiencing poor Mental Health that do not meet the threshold for CAMHS or other external agencies can be referred for Emotional Well Being sessions. Low Self-Esteem and Self-Worth, anxiety, or pupils exiting CAMHS support, can all be referred for this intervention.

The aim is to support and offer practical steps to self-protect. It will monitor and refer on if conditions become more serious. The sessions will improve positive Mental Health, raise awareness for the individual and signpost to other support networks.

Positive Steps

The school nurse will accept referrals for pre-CAMHS work with pupils experiencing poor mental health that has been ongoing despite the intervention of pastoral staff. It will be used as an assessment of need and can be used to directly refer into CAMHS if needed.

Counselling

Counselling is available in school via referral to the SENCO and will take place weekly in school.

E-Safety

Following an incident involving unsafe or risky behaviour using a computer in school, notification will be sent through with pupil details. 1:1 direct work will be carried out to further assess the level of concern.

Notifying Parents/Carers

Where appropriate, we will discuss any concerns about a child with the child's parents/carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

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

In the case of allegations of abuse made against other children, we will normally notify the parents/carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.



Sponsored by
Dudley College of Technology



The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents/carers, with the victim, to discuss what is being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged perpetrator's parents/carers to discuss support for them, and what is being put in place that will impact them, e.g., moving them out of classes with the victim, and the reason(s) behind any decision(s).

Pupils with Special Educational Needs and Disabilities

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

Pupils with SEND are less able to protect themselves from abusers; if a pupil with SEND has trouble, they may feel they have no one to confide in. Other reasons why pupils with SEND can be more at risk include the following:

- They may be afraid to confide in someone.
- They have an increased risk of being bullied.
- Some pupils with SEND rely on adults for everything, including personal care, and this vulnerability puts them at a greater risk of being harmed or abused.
- If they have been harmed before they may not want to speak out again in fear of being disbelieved or blamed.
- Staff may not be able to spot the signs of abuse in children with SEND.

To address these additional challenges, pupils with SEND may require extra pastoral support. The additional vulnerabilities of pupils with SEND and the school's duty to make reasonable adjustments should be particularly carefully considered in situations where the use of reasonable force may be needed in response to risks presented by incidents involving children with SEND or medical conditions.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

Pupils with a Social Worker

Pupils may need a social worker due to safeguarding or welfare needs. Pupils may need this help due to abuse, neglect and complex family circumstances. We recognise that 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.



Sponsored by
Dudley College of Technology



The Local Authority will share the fact a pupil has a social worker and the DSL and all members of staff will work with and support social workers to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support to promote positive educational outcomes.

Looked-After and Previously Looked-After Children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. We will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The DSL has details of children's social workers and relevant virtual school heads.

We have appointed a designated teacher, **Daniel Cox** who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans.

Mobile Phones and Cameras

The school recognises that personal communication through mobile technologies is an accepted part of everyday life for pupils, staff, and parents/carers, but technologies need to be used safely and appropriately within the school and in accordance with the law and other appropriate school policies:

- Staff are allowed to bring their personal phones to the school for their own use but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
- Staff will not use personal phones to contact children or parents/carers.



Sponsored by
Dudley College of Technology



- Staff are not permitted to use recording equipment on their mobile phones, for example: to take recordings of pupils, or sharing images. Legitimate recordings and photographs should be captured using school equipment such as cameras, iPad or school phone. We will follow the [General Data Protection Regulation](#) and [Data Protection Act 2018](#) when taking and storing photos and recordings for use in the school.

We will follow the advice of [Guidance for Safer Working Practice for Those Working with Children and Young People in Education Settings](#). This means that staff should always turn off 3G/4G/5G data access when on school premises. Staff are also advised that the Bluetooth communication or similar function of a mobile phone (such as 'airdrop') should also be 'hidden' or always switched off when on school premises. Many mobile phones and laptops have a Bluetooth facility and therefore the potential for pupils to 'search' and infiltrate such equipment. Numerous incidents have been reported where staff have failed to turn off their Bluetooth when in the school. Pupils have then linked to staff phones and sent inappropriate material or even accessed the personal information of the staff member.

Note: Random checks may be performed by the DSL, without warning, using the Airdrop App, which will immediately scan for nearby devices that still have their wireless carriers and Airdrop application activated.

Staff Misuse

Staff should report any usage of mobile devices that causes them concern to the Headteacher. Any complaint about staff misuse will be dealt with in accordance with the school's Disciplinary Policy.

Complaints and Concerns about School Safeguarding Policies

Complaints against Staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see [Appendix 3](#)).

Other Complaints

If parents/carers that relate to a possible safeguarding issue raise concerns, the matter will be referred to the designated safeguarding lead or the senior leadership team and will be handled in line with the Child Protection and Safeguarding Policy. If the concerns related to the premises, the Headteacher would work collaboratively with the operations team to investigate the concerns further and take action if required.

Whistleblowing

The school has a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that the senior leadership team will take such concerns seriously.



Sponsored by
Dudley College of Technology



Where a staff member feels unable to raise an issue, or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#).
- The [NSPCC's what you can do to report abuse dedicated 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. Staff can call the NSPCC Whistleblowing Advice Line on 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: help@nspcc.org.uk.

Record-Keeping

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

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

Records will include:

- A clear and comprehensive summary of the concern.
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

Safeguarding records, which contain information about allegations of sexual abuse, will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within.
- **The first 5 days** of the start of a new term.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.



Sponsored by
Dudley College of Technology



We will hold records in line with our records retention schedule and [GDPR](#). The school will share information with other agencies and when this is appropriate, in line with local safeguarding procedures.

In addition:

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

Training

All Staff

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

- Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment.
 - Have a clear understanding of the needs of all pupils.

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

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

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

Volunteers will receive appropriate training, if applicable.

The DSL and Deputy/Deputies

The DSL and Deputy/Deputies will undertake child protection and safeguarding training at least every 2 years.

The DSL should also complete the 'Core Working Together' and 'Threshold' training.

The DSL will facilitate formal supervision of all Deputy DSL is each school term or as required.

The Senior Inclusion Manager and Safeguarding Lead will facilitate supervision of the DSL each school term or as required.



Sponsored by
Dudley College of Technology



The Senior Inclusion Manager and safeguarding Lead will be available to provide support with any complex cases.

The DSL will produce a whole school safeguarding calendar for the academic year. This will be subject to change if new Policies, procedures, or guidelines are issued at Local or National levels.

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

They will also undertake Prevent awareness training.

Local Advisory Committee

All members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge and can be assured those safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding. In addition, all members must receive annual updates.

As the chair of the committee may be required to act as the ‘case manager’ if an allegation of abuse is made against the Headteacher, they receive training in managing allegations for this purpose.

A member of the local advisory committee will take a lead on Safeguarding. Additional training will be provided as required. The named LAC member will meet with the DSL on a half termly basis to check this policy is being carried out in practice. The visit will include checking the status of the school Single Central Register.

Recruitment – Interview Panels

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

Staff Who Have Contact with Pupils and Families

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

Monitoring Arrangements

This policy will be reviewed annually (or before if, significant changes are made to statutory frameworks). At every review, the Board of Trustees will approve it.



Sponsored by
Dudley College of Technology



Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Anti-Bullying
- Disciplinary
- Complaints
- Health and safety
- Attendance
- Online safety
- Equality
- Relationships education
- Sexual Violence and Sexual Harassment
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Low Level Concerns

The following appendices are based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#).



Sponsored by
Dudley College of Technology



Appendix I: Types of Abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing.
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet).

Adult males do not solely perpetrate sexual abuse. Women can also commit acts of sexual abuse, as can other children.

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



Sponsored by
Dudley College of Technology



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 caregivers).
- Ensure access to appropriate medical care or treatment.

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

Child on Child Abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. It can also take place both face-to-face and online and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that does not mean that this kind of abuse is not happening.

Child on child abuse is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse').
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence) .
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- 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.
- Consensual and non-consensual sharing of nudes and semi-nude images and or videos (also known as, sexting or youth produced sexual imagery). *Please see UKCIS guidance '[Sharing nudes and semi-nudes advice for education settings](#)'.*
- Upskirting. [The Voyeurism \(Offences\) Act 2019](#) ("upskirting"), typically involves someone taking a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress, or alarm. It is a criminal offence. Anyone of any gender can be a victim.
- Sexting (also known as youth produced sexual imagery).



Sponsored by
Dudley College of Technology



- 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 include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who do not want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in this policy, as appropriate.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Staff are clear as to the school's policy and procedures about child-on-child abuse as defined in the anti-bullying, school behaviour policy and broader child protection procedures. Staff understand that even if there are no reports it does not mean it is not happening. As such, it is vital that if staff have any concerns regarding child-on-child abuse, they should speak to their DSL (or Deputy DSL).

Child on child abuse will not be tolerated by Kates Hill Primary School or minimised in any way and is always taken seriously. Staff understand the importance of challenging inappropriate behaviours between peers that are abusive in nature.

All allegations of child-on-child abuse will be recorded as per school system, investigated, and dealt with accordingly. Victims, perpetrators, and other children affected by child-on-child abuse will be supported through school and multi-agency support mechanisms. We make it clear to children how and where they can confidently report abuse, knowing that it will always be taken seriously.

Signs that a child may be suffering from child-on-child abuse can also overlap with those indicating other types of abuse and can include:

- Failing to attend school, disengaging from classes, or struggling to carry out school related tasks to the standard ordinarily expected.
- Physical injuries.
- Experiencing difficulties with mental health and/or emotional wellbeing.
- Becoming withdrawn and/or shy; experiencing headaches, stomach aches, anxiety and/or panic attacks; suffering from nightmares or lack of sleep or sleeping too much.
- Broader changes in behaviour including alcohol or substance misuse.
- Changes in appearance and/or starting to act in a way that is not appropriate for the child's age.
- Abusive behaviour towards others.



Sponsored by
Dudley College of Technology



Abuse affects children very differently. The above list is by no means exhaustive and the presence of one or more of these signs does not necessarily indicate abuse.



Sponsored by
Dudley College of Technology



Appendix 2: Safer Recruitment and DBS Checks – Policy and Procedures

These are the types of checks available to those working with children:

Type Of Check	What The Check Involves	Positions Eligible For This Level Of Check
Standard check	Check of the Police National Computer records of convictions, cautions, reprimands and warnings.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 .
Enhanced check	Check of the Police National Computer records plus additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed.	The position being applied for must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002 .
Enhanced criminal record check with children’s and/or adult’s barred list information	Check of the Police National Computer records plus additional information held by police plus check of the DBS Children’s Barred List plus check of the DBS Adults’ Barred List.	The position must be eligible for an enhanced level criminal record check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check.

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.

Recruitment and Selection Process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.



Sponsored by
Dudley College of Technology



Advertising

When advertising roles, we will make clear:

- Our commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the [Rehabilitation of Offenders Act 1974](#) and the amendments to the [Exceptions Order 1975, 2013 and 2020](#). If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot consider them.

Application Forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least two people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they can share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history.
 - Whether they are included on the barred list.
 - Whether they are prohibited from teaching.
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
 - Any relevant overseas information.
- Sign a declaration confirming the information they have provided is true.

Seeking References and Checking Employment History

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.



Sponsored by
Dudley College of Technology



When seeking references, we will:

- Not accept open references.
- Make direct contact with all referees and verify any information contained within references with the referees.
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the Headteacher/Headteacher as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and Selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.

Pre-appointment Vetting Checks

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

All offers of appointment will be conditional until satisfactory completing of the necessary pre-employment checks. When appointing new staff, we will:

Verify their identity (best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the [GOV.UK website](#))

- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before or as soon as practicable after, appointment, including when using the DBS update service.



Sponsored by
Dudley College of Technology



We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.

- 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. These could include, where available:
 - For all staff, including teaching positions: [criminal records checks for overseas applicants](#).
 - For teaching positions: obtaining a letter of professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason that person may be unsuitable to teach.
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state.

* Management positions are most likely to include, but are not limited to, Headteacher, Headteacher and deputy/assistant Headteacher(s).

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.

Regulated Activity means a person who will be:

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



Sponsored by
Dudley College of Technology



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. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

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
- We believe 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
- We believe 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.

This is a legal duty and failure to refer when the criteria are met is a criminal offence.

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 people presenting themselves for work are 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.



Sponsored by
Dudley College of Technology



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/Pupil Teachers

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

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the [2018 Childcare Disqualification Regulations](#) and [Childcare Act 2006](#). Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trustees/Local Advisory Committee Members

All trustees and members will have an enhanced DBS check without barred list information.

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

The chair of the board will have their DBS check countersigned by the secretary of state.

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

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.



Sponsored by
Dudley College of Technology



- Identity.
- Right to work in the UK.
- Other checks deemed necessary if they have lived or worked outside the UK.

Using the free Employer Secure Access sign-in portal via the [Teaching Regulation Agency's \(TRA\)](#), schools can easily check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction.

Associate Members

Associate members are appointed by the governing body to serve on one or more governing body committees. [The School Governance \(Constitution and Federations\) \(England\) \(Amendment\) Regulations 2016](#) made enhanced DBS check mandatory for maintained school governors but not associate members.

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 arranges 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.



Sponsored by
Dudley College of Technology



Appendix 3: Allegations of Abuse Made Against Staff

Section 1: Allegations that May Meet the Harms Threshold

This section of this policy applies to all cases in which it is alleged that a current member of staff (including teachers, supply teachers, other staff, volunteers, and contractors) 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.
- Behaved towards a child or children in a way that indicates they would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

If we are in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the Headteacher or the chair of the Local Advisory Committee where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the Accused Until the Case Is Resolved

Suspension 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 school trust.



Sponsored by
Dudley College of Technology



If in doubt, the case manager will seek view for the school's Senior Human Resources Officer and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for Outcomes of Allegation Investigations

- **Substantiated:** there is sufficient evidence to prove the allegation.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation.
- **False:** there is sufficient evidence to disprove the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.

Procedure for Dealing with Allegations

In the event of an allegation that meets the criteria above, the Headteacher (or chair of the committee where the Headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Discuss the allegation with the designated officer at the Local Authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed 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.



Sponsored by
Dudley College of Technology



- **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 the 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 consider 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 (only in relation to their child – no information will be shared regarding the staff member), 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 school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.



Sponsored by
Dudley College of Technology



Additional considerations for supply teachers and all contracted staff:

If there are, concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency, we would 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 considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

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

Timescales

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious 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.

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

Specific Actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's Human Resources adviser will discuss with the designated



Sponsored by
Dudley College of Technology



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, unfounded, false, or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is:

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

Confidentiality and information sharing

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

The case manager will take advice from the 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.



Sponsored by
Dudley College of Technology



- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

Record keeping

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

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

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

- A clear and comprehensive summary of the allegation.
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome (and justification for these, as stated above).
- A declaration on whether the information will be referred to in any future reference.

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

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.

References

When providing employer references, we will:

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

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):



Sponsored by
Dudley College of Technology



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

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

Non-Recent Allegations

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

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

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

Section 2: Concerns That Do Not Meet the Harm Threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold, set out in section 1 above.

Concerns may arise through, for example:

- Suspicion.
- Complaint.
- Safeguarding concern or allegation from another member of staff.
- Disclosure made by a child, parent/carer, or other adult within or outside the school.
- Pre-employment vetting checks.

For further details refer to the Trust's Low Level Concerns Policy.

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children.



Sponsored by
Dudley College of Technology



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

Sharing low-level concerns

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

We will create this culture by:

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

Responding to low-level concerns

Concerns about safeguarding should be reported to the designated safeguarding lead or their deputy.

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

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

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The Headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Please refer to the school's Low Level Concerns policy that sets out a framework whereby staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working the school.



Sponsored by
Dudley College of Technology



Record keeping

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

Records will be:

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

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

References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues, which would ordinarily be included in a reference, such as misconduct or poor performance.



Sponsored by
Dudley College of Technology



Appendix 4 – Specific Safeguarding Issues

Below is important additional information about specific forms of abuse and safeguarding issues. If any member of staff has any concerns about a child's welfare, they should act on them immediately. They should follow this policy and speak to their DSL (or deputy).

Where a child is suffering, or is likely to suffer from harm, it is important that a referral to children's social care (and if appropriate the police) is made immediately.

Child Abduction and Community Safety Incidents

Children and the Court System

Children are sometime required to give evidence in criminal courts, for crimes committed against them or for crimes, they have witnessed. There are two age-appropriate guides to support children 5-11-year-olds and 12-17-year-olds. They explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families.

This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents/carers.

Children with Family Members in Prison

Approximately 200,000 children have a parent/carer sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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.



Sponsored by
Dudley College of Technology



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.

Elective Home Education (EHE)

Many home-educated children have an overwhelmingly positive learning experience. We would expect the parents'/carers' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we work together with LAs, schools, and other key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

The school will make a record of communications and decisions regarding EHE and log them on our safeguarding systems.

Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

Individuals or groups, males or females, and children or adults can perpetrate the abuse. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be



Sponsored by
Dudley College of Technology



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

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.
- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

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

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

Males or females, and children or adults can perpetrate the abuse. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.

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



Sponsored by
Dudley College of Technology



If a child is thought to be at risk or discloses they are suffering sexual exploitation, the DSL will follow the [Section 47](#) referral as described above. The DSL will also complete a Child Sexual Exploitation Screening Tool and a Police referral, sending them all to the MASH.

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move (and store) drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in several locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- Go missing and are subsequently found in areas away from their home.
- Have been the victim or perpetrator of serious violence (e.g., knife crime).
- Are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs.
- Are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.
- Are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity.
- Owe a ‘debt bond’ to their exploiters.
- Have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

If a child is suspected to be at risk of or involved in county lines, or a child discloses Criminal Exploitation, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. The matter will be referred to the MASH to establish Threshold levels. It will usually require a referral to the Early Help Team at Youth Offending Services; however, this will rely on parental consent being obtained. If consent is refused, then a MARF will be completed and sent to Children’s Services.



Sponsored by
Dudley College of Technology



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 National Referral Mechanism (NRM) is available in the [Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims.](#)

Cybercrime

The use of technology has become a significant component of many safeguarding issues. CSE; radicalisation; sexual predation: technology often provides the platform that facilitates harm. Risks can be categorised in three areas:

- **Content:** being exposed to illegal, inappropriate, or harmful material.
- **Contact:** being subjected to harmful online interaction with other users.
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm.
- **Commerce:** risks such as online gambling, phishing, or financial scams.

A whole school approach is taken to online safety. We endeavour to ensure appropriate filters and appropriate monitoring systems are in place. Our Children are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum. This may include covering relevant issues through Relationships and Health Education. All Trust academies will implement the Government's new mandatory guidelines for Relationships and Sex Education in September 2021.

All Academies have appropriate internet filtering and monitor all activity accordingly. Please see our e-safety policy for further information.

Whilst we ensure that appropriate filters and monitoring systems are in place, we are mindful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught about online teaching and safeguarding. Child acceptable user policies are in place drawn up with pupils to always ensure safe access to the internet (when children use 3G/4G data on phones for example).

Domestic Abuse

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that is not physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children. Children who witness domestic abuse are also victims.



Sponsored by
Dudley College of Technology



Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

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

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in the school (usually the designated safeguarding lead) before the child or children arrive at the school the following day.

[Operation Encompass](#) operates in most police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in the school before the child or children arrive at the school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

The DSL will provide support according to the child's needs and update records about their circumstances.

[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: young people and domestic abuse.](#)
- [Black Country Women's Aid.](#)



Sponsored by
Dudley College of Technology



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 into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a young person faces the imminent risk of becoming homeless, the DSL should contact MASH for urgent support. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as the family being asked to leave a property.

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

So-Called 'Honour-Based' Abuse (Including FGM and Forced Marriage)

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

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

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

If there are concerns or a child makes a disclosure of Forced Marriage or Honour Based Abuse, staff will inform the DSL. The DSL will follow [Section 47](#) referral through a MARF and if needed contact the Forced Marriage Unit for further advice.

Female Genital Mutilation (FGM)

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/pupil already being known to social services in relation to other safeguarding issues.
- A girl:
 - Having difficulty walking, sitting, or standing, or looking uncomfortable.
 - Finding it hard to sit still for long periods of time (where this was not a problem previously).

- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to consider the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

Forced Marriage

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

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



Sponsored by
Dudley College of Technology



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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the Local Authority's designated officer.
- Seek advice from the [Forced Marriage Unit](#) on 020 7008 0151 or fm@fco.gov.uk.
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for advancing a political, religious, or ideological cause.

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website [Educate against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

- Refusal to engage with or becoming abusive to, peers who are different from themselves.



Sponsored by
Dudley College of Technology



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

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

If staff are concerned about a pupil, they will follow our procedures set out in '[Concerns about a Child](#)' section of this policy, including discussing their concerns with the DSL. Staff must **always** act if they are worried.

If there are concerns about a child being radicalised under the [Prevent Duty \(2015\)](#) or they disclose extremist ideology and views, then the DSL will make a referral completing a MARF and a Prevent Referral for Channel. Awareness of the Far-Right movement within the local area will be closely monitored. Parents/Carers will only be notified if instructed by MASH or Prevent staff.

[Channel](#) is a voluntary, confidential support programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is voluntary at all stages.



Sponsored by
Dudley College of Technology



The Prevent Duty (Radicalisation and Extremism)

Kates Hill Primary School is actively involved in the Prevent strategy. The school has a part to play in fostering shared values and promoting cohesion. Extremist ideology runs counter to the school and British values. Therefore, our community aims to successfully promote respect and tolerance for others, the rights of all to live and study free from persecution of any kind, freedom of speech, democracy, the rule of law and equality of opportunity and treatment. Extremism promotes fear and division and actively seeks to cause destructive relationships between different communities. Our school strategy for preventing extremism has five key objectives:

1. To promote and reinforce school and British values; to create space for free and open debate; listen and support the pupil voice and enable pupils to develop their self-knowledge, self-esteem, and self-confidence.
2. To promote social cohesion by supporting inter-faith and inter-cultural dialogue and understanding, and to engage all pupils in playing a full and active role in wider engagement in society.
3. To ensure pupil safety and that the school is free from bullying, harassment, and discrimination.
4. To provide support for pupils who may be at risk and offer appropriate sources of advice and guidance.
5. To ensure that pupils and staff are aware of their roles and responsibilities in preventing terrorism and radicalisation.

Kates Hill Primary School values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both pupils and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and 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. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.

Our school, like all others, is required to identify a 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: this will normally be the Designated Safeguarding Lead.

Staff should use their judgement in identifying children who may be at risk of radicalisation and act proportionately which may involve the DSL (or Deputy DSL) making a Prevent referral.

The SPOC for Kates Hill Primary School is Dudley Safe and Sound and the West Midlands CTU.

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.



Sponsored by
Dudley College of Technology



Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for advancing a political, religious, or ideological cause.

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

Pupils 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 can recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity Crisis – the pupil is distanced from their cultural / religious heritage and experiences discomfort about their place in society.
- Personal Crisis – the pupil 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 pupil'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 pupil 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 – pupils may have trouble 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.

Risk factors that are more critical 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.



Sponsored by
Dudley College of Technology



- Justifying the use of violence to solve societal issues.
- Joining or seeking to join extremist organisations.
- Significant changes to appearance and / or behaviour.
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

Preventing Violent Extremism - Roles and Responsibilities of the Single Point of Contact (SPOC)

The SPOC is responsible for:

- Ensuring that staff of the school are aware of who is the SPOC in relation to protecting pupils from radicalisation and involvement in terrorism.
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing pupils from becoming involved in terrorism and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism.
- Raising awareness about the role and responsibilities of the school in relation to protecting pupils from radicalisation and involvement in terrorism.
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs.
- Raising awareness within the school about the safeguarding processes relating to protecting pupils from radicalisation and involvement in terrorism.
- Acting as the first point of contact within the school for case discussions relating to pupils who may be at risk of radicalisation or involved in terrorism.
- Collating relevant information from/ in relation to referrals of vulnerable pupils into the Channel** process.
- Attending Channel** meetings as necessary and carrying out any actions as agreed.
- Reporting progress on actions to the Channel** Co-ordinator, and
- Sharing any relevant additional information in a timely manner.

The Counter Terrorism and Security Act 2015 was published on 12th March 2015. Section 26 of the Act places a duty on schools in England (and Wales) to prevent people being drawn into terrorism.

Academies leaders (including governors) must:

- Establish or use existing mechanisms for understanding the risk of extremism.
- Ensure staff understand the risk and build capabilities to deal with it.
- Communicate and promote the importance of the duty.
- Ensure staff implement the duty effectively.

Duties on academies include:

- Effective partnership working with other local agencies, e.g., LSCB, police, health, etc.
- Information sharing.
- Maintaining appropriate records.



Sponsored by
Dudley College of Technology



- Assessing local risk of extremism (including Far Right extremism).
- Demonstrating they are protecting children.
- Developing clear protocols for visiting speakers.
- Safeguarding policies that take account of Local Safeguarding Children Board (LSCB) policies and procedures.
- Training staff to give them knowledge and confidence.
- Ensuring there is robust ICT protocols that filter out extremist materials.
- School buildings must not be used to give a platform to extremists.

**Channel is a multi-agency approach to provide support to individuals, who are at risk of being drawn into terrorist related activity. The West Midlands Police Counter-Terrorism Unit leads it, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals.
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity.
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Prevent referrals may result in a Channel Panel which the school may be asked to attend to do an assessment. Statutory guidance on Channel is available at [Channel guidance](#).

Sexual Violence and Sexual Harassment between Children in Schools

In the 2021 DfE, guidance sexual violence is defined under the [Sexual Offences Act 2003](#) as rape, assault by penetration or sexual assault (sexual touching) without consent. Consent is about having the freedom and capacity to choose. The age of consent to any form of sexual activity is 16.

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex.
- Through a group of children sexually assaulting or sexually harassing a single child or group of children.
- Online and face to face (both physically and verbally).

Sexual violence and sexual harassment exist on a continuum and may overlap.

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, and calling someone sexualised names.
- Sexual “jokes” or taunting.



Sponsored by
Dudley College of Technology



- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos, or drawings of a sexual nature.
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence and
- Sexting – sending sexually inappropriate text messages (for further sexting advice see [UKCCIS guidance](#)).

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them.
- Regularly review decisions and actions, and update policies with lessons learnt.
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns.
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again.
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them.



Sponsored by
Dudley College of Technology



If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will report it to the DSL using the internal reporting system. The DSL will use the Brook Traffic Light System to identify levels of risk. Green will indicate normal age-appropriate sexualised behaviour; Amber will identify a concern requiring further internal action and red will indicate a [Section 47 referral](#) is made. If a MARF is to be completed, it will be sent with the completed risk assessment. Parents/carers will be notified unless it would place the child at greater risk or if instructed not to do so by the MASH Team.

Serious violence

Indicators, which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors, which increase the likelihood of involvement in serious violence, include:

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

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Responding to Reports of Sexual Violence or Sexual Harassment

Ultimately, any decisions need to be made on a case-by-case basis, with the Designated Safeguarding Lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required.

The Response to a Report of Sexual Violence or Sexual Harassment

- Children may not find it easy to tell staff.
- Looks for signs, pupils may show signs or act in ways that they hope adults will notice.
- Act immediately.
- Initial response from adults and the school is vital - do not compromise confidence of future victims.
- All victims reassured, taken seriously - supported and kept safe. Nothing downplayed or made to feel ashamed.



Sponsored by
Dudley College of Technology



- Report in line with safeguarding reporting procedures within this policy. Report to DSL immediately and then involve social care if required.
- If possible, manage reports with two staff members present, one preferably the DSL.
- Where the report includes an online element be aware of searching, screening, and confiscation advice (for schools) and the UKCIS Sharing nudes and semi nudes: advice for education settings working with children and young people. The key consideration is for staff not to view or forward illegal images of a child.
- Do not promise confidentiality - very likely report will need to be shared. Make sure the victim knows the next steps.
- Be supportive and respectful. Listen carefully to the child, reflect, use the child's language, do not ask leading questions, and only prompt the child with open questions.
- Best practice is to wait until the end of the report to write up a thorough summary, although it is possible to make notes, particularly if a second staff member is present. Do not allow note making to get in the way of giving the child your full attention. Either way a written report is essential.
- Only record facts and not staff members' personal opinions.

Whether the reported incident has taken place on site or off site, or whether it involves a child from another school or college, the safeguarding duty remains the same.

Confidentiality and Information Sharing

Staff taking a report should never promise confidentiality as it is very likely it will be in the best interests of the victim to seek advice and guidance from others to provide support and engage with appropriate agencies. The school should only engage staff and agencies required to support the children involved and/or be involved in the investigation. The victim may ask for it not to be shared. If the victim does not give consent to share, staff can still share it, if it is justified to be in the public interest, e.g., to protect children from harm.

The DSL or Deputy DSL should consider the following:

- Parents/carers should normally be informed (unless it puts victim at greater risk)
- If child at risk of harm, is in immediate danger, or had been harmed, a referral should be made to children's social care and
- Rape, assault by penetration and sexual assaults are crimes. Where a report of one of these is made, this should be referred to the police. Whilst age of criminal responsibility is 10, police should still be informed if the child is under 10. Police will take a welfare approach rather than criminal for a child under 10.

Ultimately, the DSL (or Deputy) will have to balance a victim's wishes against their duty to protect the victim and other children. If the DSL (or Deputy) decide to refer to children's services or the police against a victim's wishes, this should be handled extremely carefully, with the reasons explained and professional support offered.



Sponsored by
Dudley College of Technology



Risk Assessment

Where there has been a report of sexual violence, the DSL (or Deputy) should make an immediate risk and needs assessment. Where the report is sexual harassment, the need for a risk assessment should be on a case-by-case basis. The risk assessment should consider:

- The victim, especially their protection and support.
- Whether there may have been other victims.
- The alleged perpetrator(s) and
- All the other children (and staff) at the school, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

Risk assessments should be recorded and kept under review. As part of risk assessments, the DSL (or Deputy) should ensure they are engaging with children's social care and specialist services as required.

Action Following a Report of Sexual Violence and/or Sexual Harassment

Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment both online and offline. Important considerations will include:

- The wishes of the victim and how they want to proceed and the control of the investigation and support. However, this needs to be balanced with the school's need to protect other children.
- The nature of the alleged incident (s), including whether a crime may have been committed and/or whether harmful sexual behaviour has been displayed.
- The ages of the children involved.
- The developmental stages of the children involved.
- Any power imbalance between the children. For example, is an alleged perpetrator significantly older, more mature, or more confident? Does the victim have a disability or learning difficulty?
- If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
- That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
- Are there ongoing risks to the victim, other children, or school staff? and
- Other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

Always act in the best interests of the child. Immediate consideration should be given to how best support and protect the victim and the alleged perpetrator (s) (and any other children involved/impacted). Further information on this support can be found in part 5 of KCSIE and the DfE guidance.



Sponsored by
Dudley College of Technology



Four likely scenario actions following a report:

1. **Manage internally** - in some incidents of one of sexual harassment, behaviour and/or bullying policies and pastoral support may be more appropriate action.
2. **Early help** - children may not require a statutory service but would benefit from early help.
3. **Refer to children's social care** - where a child has been harmed, is at risk of harm, or is in immediate danger.
4. **Report to the police** - any report to the police generally done in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the starting point is this should be passed on to the police.

Safeguarding and supporting the victim, the alleged perpetrators (s) and other children must be an ongoing consideration.

See further guidance in KCSIE and in the 2021 DfE guidance '[Sexual violence and sexual harassment between children in schools and colleges](#)': managing the report, referrals, police reporting, criminal process, ongoing response, safeguarding and supporting the victim and the perpetrator, etc.

What further support is available?

The NSPCC are working with the Government to provide support in this area. The NSPCC have launched a dedicated helpline for children and young people who have experienced abuse at school, and for worried adults (including parents) and professionals that need support and guidance. NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk.

[The Anti-Bullying Alliance](#) have produced some useful guidance for schools on preventing sexual bullying.

How will pupils be educated in this area?

We follow the DfE's Relationships, Sex Education (RSE), and Health Education statutory guidance. This tackles issues such as:

- Healthy and respectful relationships.
- What respectful behaviour looks like.
- Consent; gender roles, stereotyping.
- Equality.
- Body confidence and self-esteem.
- Prejudiced behaviour.
- Sexual violence and sexual harassment.

In addition to this curriculum provision, we also teach children about appropriate sexual behaviour and respectful relationships through form time, assemblies and by learning from specialist visitors such as the police and the NSPCC.



Sponsored by
Dudley College of Technology



Childhood Mental Health

Mental health and suicidal thoughts can affect anyone, of any age, of any background, at any time. 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.

Where children have suffered abuse, neglect, or potentially traumatic adverse childhood experiences, it is key that staff are aware of how this can affect their mental health, behaviour, and education.

It can be difficult to know if a child is suffering as they often keep it to themselves.

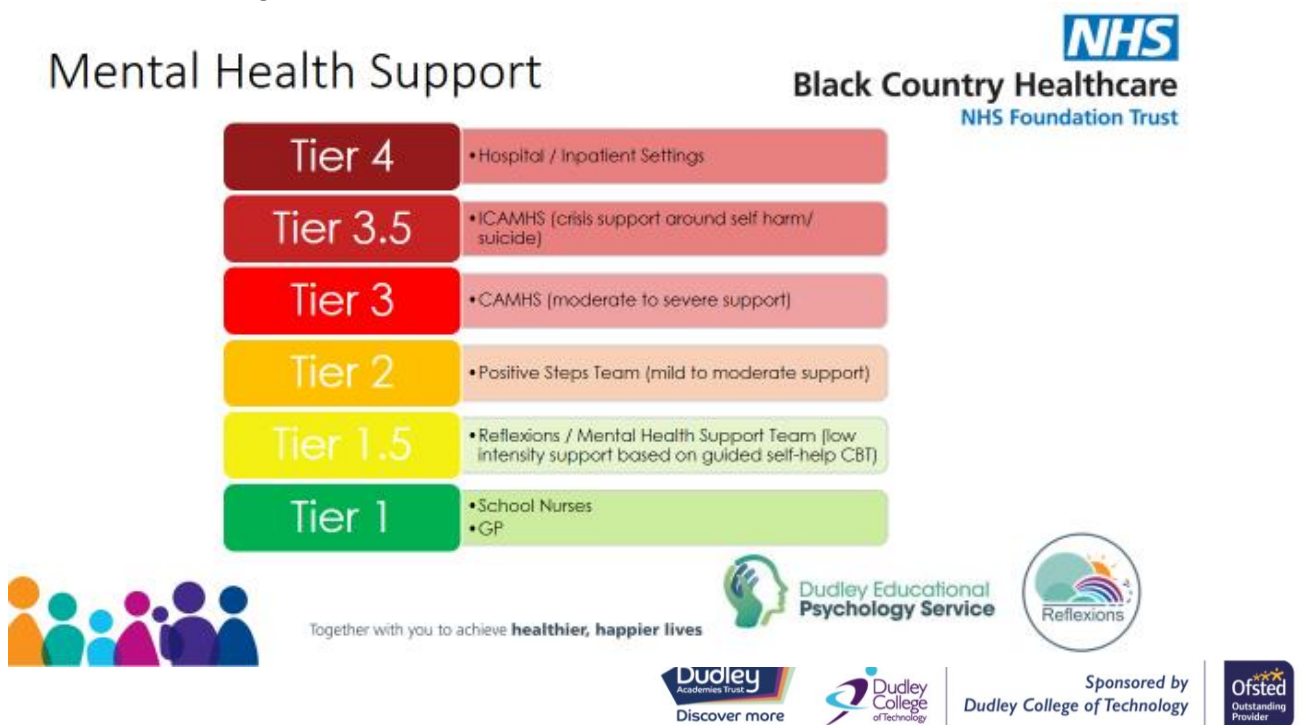
Some characteristics for childhood mental health may be:

- Becoming withdrawn from family and friends.
- Persistent low moods and unhappiness.
- Tearfulness and irritability.
- Worries that stop them carrying out day to day tasks.
- Sudden outbursts of anger directed toward others or themselves.
- Loss of interest in activities that they used to enjoy.
- Problems eating and sleeping.

Only appropriately, trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Any member of staff or volunteer who suspects a child or young person is suffering mental health and it is a safeguarding concern, they should record, consult, and share their concerns with the DSL immediately.

Mental health support is generally delivered through a tiered model of service organisation, as shown in the diagram below:



The department has published advice and guidance on [Preventing and Tackling Bullying](#), and [Mental Health and Behaviour in Schools](#). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance [Promoting children and young people's emotional health and wellbeing](#). Its resources include social media, forming positive relationships, smoking and alcohol.

Self-Harm and Mental Health

Although this area is of paramount importance, it is not supported by Children's Services as significant harm. Children thought to be suffering poor mental health or disclose self-harm will be referred to the parent/carer to take to the family GP. The GP will assess the medical needs and refer as required.

CAMHS referrals can only be made via GP or hospital referral. The DSL will advise parents/carers on procedures to follow if they are concerned at home, this may include attending the local A&E or even phoning 999 in cases of emergency. If a parent/carer fails to seek medical help for their child, consideration will be given to possible Neglect and a [Section 47 referral](#).

We will follow the advice of [Mental Health and Behaviour in Schools November 2018](#) to support pupils whose mental health problems manifest themselves in behaviour. We will promote the welfare of our pupils, which includes preventing impairment of children's health or development and taking action to enable all children to have the best outcomes. Full details are set out in [Keeping Children Safe in Education \(KCSIE\) statutory guidance](#).

Lesbian, Gay, Bisexual and Transgender (LGBT)

As a Trust, we believe that respect for ourselves and others is a fundamental right and responsibility off/for all. We will always challenge inappropriate language or behaviour and never ignore 'banter'.

It is the duty of all staff to ensure that every member of the Trust community feels valued, irrespective of their sexual/gender orientation, race, or religion. Diversity is celebrated and valued within Dudley Academies Trust.

The voice of the pupil will be captured through Student Leaders lead focus groups which follow the Trust-wide value of 'Respecting each other and our world' and therefore promote the ethos of a fully inclusive school.

Looked After Children and Previously Looked After Children

We will ensure that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after or have been looked after by the Local Authority.

In cases of looked after or previously looked after pupils, the DSL should have details of child's social worker and name of Virtual Head of School in Local Authority.



Sponsored by
Dudley College of Technology



The DSL should have information regarding the child's looked after legal status (whether looked after via a voluntary arrangement of interim or full care order).

- Information regarding care arrangements and levels of authority delegated to the carer.
- Information regarding contact arrangements with birth parents or those with parental responsibility.

A previously looked after child remains potentially vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. It is important that all agencies work together, and prompt action be taken when necessary to safeguard this particularly vulnerable group of pupils.

Looked after pupils must have a designated leader who will promote the educational achievements of looked after pupils ([Section 20 Children and Young Persons Act 2008](#)).

The designated teacher must have appropriate training, qualifications, and experience.

The designated teacher will also promote educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or adopted from state care outside England and Wales.

Private Fostering

Private fostering applies to a child under the age of 16, or under 18, if disabled.

Private fostering is an arrangement made privately (i.e., not involving the local authority). A private foster carer is someone other than a parent or close relative that takes on the day-to-day care of a child. Private foster carers may be from the extended family, such as a cousin or great aunt. However, a person who is a relative under the [Children Act 1989](#) i.e. a grandparent, brother, sister, uncle or aunt (whether of the full or half blood or by marriage) or stepparent will not be a private foster carer. A private foster carer may be a friend of the family, the parent of a friend of the child, or someone previously unknown to the child's family who is willing to privately foster a child. The parent retains overall responsibility for the welfare of the child.

The private foster carer becomes responsible for providing the day-to-day care of the child in a way, which will promote and safeguard their welfare. Overarching responsibility for safeguarding and promoting the welfare of the privately fostered child remains with the parent or other person with parental responsibility. Local authorities do not formally approve or register private foster carers. However, it is the duty of local authorities to satisfy themselves that the welfare of children who are, or will be, privately fostered within their area is being, or will be, satisfactorily safeguarded and promoted. It is the local authority, in whose area the privately fostered child resides, which has legal duties in respect of that child.

There is a mandatory duty to inform local authority of children in private fostering arrangements.

All staff in our school will inform the Designated Safeguarding Lead of any children that fall into the category of private fostering.



Sponsored by
Dudley College of Technology



Young Carer

The designated lead (or a deputy) is responsible for keeping a record of those pupils who play the part of a major carer for a family member. However, such families do not often publicise their situation for fear of social care involvement. The care provided can be physical or emotional support. It includes.

- Physical disability.
- Mental Disability.
- A long-term life limiting illness.
- Problems with mental Health.
- Alcohol or drug abuse related problems.
- Age related frailty.

The school will offer a support package to these pupils appropriate to their individual situation. The DSL will make a referral to [Sandwell Crossroads Caring for Carers](#) for a full assessment of need; this may involve information sharing with other agencies.

Teenage Pregnancy

In accordance with the Teenage Pregnancy Pathway ([Appendix 5](#)), the DSL will make a direct referral to the School Nursing Team to provide support for all teenage girls aged 16 or under. Referrals will be made as soon as possible to ensure support for the young person through testing, making appropriate referrals, including termination.

The DSL will inform parents/carers of any suspected or confirmed pregnancy, unless in doing so would place the child at risk of harm, including honour-based abuse.

The DSL will assess the level of need and concern and decide if a referral is required to external agencies. This will be addressed on an individual basis, considering any previous concerns.

A health lead risk assessment will be carried out for pregnant girls to remain in school for as long as possible before the birth and are supported back into school appropriately. Assistance is also given to ensure childcare is in place under the Care to Learn Scheme. Young fathers are also supported through sexual health and financial advice through Early Help.

Pupils can request to see the School Nurse in confidence if over the age of 13. If a pupil discloses a suspected or confirmed pregnancy to the School Nurse, they will follow their Safeguarding procedures. This may mean that parents/carers are not notified.

In addition to the above, the following are also Safeguarding concerns that will be reported to the DSL.

- Bullying (see bullying policy) including online and prejudice-based bullying.
- Racist, disability, homophobic or transphobic abuse.
- Gender Based violence or violence against women and girls.
- Use of modern technology relating to safety.
- Gangs and Youth Violence.
- Teenage Relationship Abuse.



Sponsored by
Dudley College of Technology



- Sexual Health and Safety.
- Any other issue that poses a risk to the safety of a child.

Non-collection of Pupils

If a child is not collected at the end of the session/day, we will ensure that the child receives a high standard of care to cause as little distress as possible.

Parents/carers of children starting at the setting are asked to provide the following specific information, which is recorded on our Registration Form:

- Names, addresses, telephone numbers of adults who are authorised by the parents/carers to collect their child from the setting, for example a childminder or grandparent.
- Any person who has parental responsibility for the child.
- Information about any person who does not have legal access to the child.

On occasions when parents/carers are aware that they will not be at home or in their usual place of work, they inform us of how they can be contacted.

On occasions when parents/carer or the persons normally authorised to collect the child are not able to collect the child, they provide us with written details of the name, address and telephone number of the person who will be collecting their child. We agree with parents/carers how to verify the identity of the person who is to collect their child.

Parents/carers are informed that if they are not able to collect the child as planned, they must inform us so that we can begin to take back-up measures. We provide parents/carers with our contact telephone number.

We inform parents/carers that we apply our child protection procedures as set out in our child protection and safeguarding policy if an authorised adult does not collect their children from setting within one hour after the setting has closed and the staff can no longer supervise the child on our premises.

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

- The child's file is checked for any information about changes to the normal collection routines.
- If no information is available, parents/carers are contacted.
- If this is unsuccessful, the adults who are authorised by the parents/carers to collect their child from the setting – and whose telephone numbers are recorded on the Registration Form – are contacted.
- All reasonable attempts are made to contact the parents/carers or nominated carers.
- The child does not leave the premises with anyone other than those named on the Registration Form or in their file.
- If no one collects the child after one hour and there is no one who can be contacted to collect the child, we apply the procedures for uncollected children.
- We contact our local authority children's **Social Care Team**.
- Out of hours' duty officer **0300 555 2922**.



Sponsored by
Dudley College of Technology



- The child stays at setting in the care of two fully vetted workers until the child is safely collected either by the parents/carers or by a social care worker.
- Social Care will aim to find the parent/carer or relative if they are unable to do so, the child will become looked after by the local authority.
- Under no circumstances do staff go to look for the parent/carer, nor do they take the child home with them.
- A full written report of the incident is recorded on the child's Chronological report.
- Depending on circumstances, we reserve the right to charge parents/carers for the.
- Additional hours worked by our staff.
- Ofsted may be informed: **03001231231**.
- Parents/carers attending any groups, sessions or drop-ins within the organisation are responsible for their own children at all times.

Missing Pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation, or radicalisation. 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.
- 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; 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 in immediate danger or at risk of harm.



Sponsored by
Dudley College of Technology



Use of Reasonable Force

Use of reasonable force is a professional judgement of staff and will always depend on the individual circumstances. “Reasonable force” means “using no more force than is needed” KCSIE Paragraph 108. This may involve passive physical contact (standing between pupils or blocking a child’s path) or active contact (removing a pupil from a situation). When responding to pupils with SEN or disabilities the risk should be carefully assessed recognising the vulnerability of this group.

Individual behaviour plans for pupils of vulnerable groups – agreed with parents/carers should be in place to reduce the occurrence of challenging behaviour and the need to use “reasonable force”.



Sponsored by
Dudley College of Technology

