HOLYWELL CHURCH OF ENGLAND MIDDLE SCHOOL

Safeguarding Children Policy

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Statement of intent

Holywell is committed to safeguarding and promoting the welfare, both physical and emotional, of every student both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- Creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children.
- Teaching students how to keep safe and recognise behaviour that is unacceptable.
- Identifying and making provision for any student that has been subject to abuse and neglect.
- Ensuring that members of the governing board, the headteacher and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and neglect and know to refer concerns to the Designated Safeguarding Lead.
- Ensuring that the headteacher and any new staff members and volunteers are only appointed when all the appropriate checks have been satisfactorily completed.

The Designated Safeguarding Leads are: **Miss Alison Stewart, Deputy Headteacher and Mrs Jillian Davies, SENCo and Assistant Headteacher**.

In the absence of the DSL, child protection matters will be dealt with by **Miss E Collins, Assistant Safeguarding Lead and Mr Stephan van der Merwe, Deputy Headteacher.**

Definitions

1.1 The terms **"children"** and **"child"** refer to anyone under the age of 18.

1.2 For the purposes of this policy, "safeguarding and protecting the welfare of children" is defined as:

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

1.3 For the purposes of this policy, the term **"harmful sexual behaviour"** includes, but is not limited to, the following actions:

- Using sexually explicit words and phrases
- Exposing a child to sexual material
- Taking/sending explicit images of/to a child
- Inappropriate touching
- Sexual violence or threats
- Full penetrative sex with other children or adults.

1.4 In accordance with the DfE's guidance, 'Sexual violence and sexual harassment between children in schools and colleges' (2018), and for the purposes of this policy, the term **"'sexual harassment"** is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.

1.5 For the purpose of this policy, the term **"sexual violence"** encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.

1.6 The term **"teaching role"** is defined as planning and preparing lessons and courses for students; delivering lessons to students; assessing the development, progress and attainment of students; and reporting on the development, progress and attainment of students. These activities are not teaching work if the person carrying out the activity does so (other than for the purposes of induction) subject to the direction and supervision of a qualified teacher or other person nominated by the headteacher to provide such direction and supervision.

Legal framework

1.7 This policy has been created with due regard to all relevant legislation including, but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers' Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- [New for 2018] General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019

Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2020) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

1.8 Other relevant school policies include:

- Attendance Policy
- Preventing Extremism and Radicalisation Policy
- Allegations of Abuse Against Staff Policy
- Behaviour for Learning Policy
- Code of Conduct for all adults
- Data Protection Policy
- GDPR Policy
- Whistleblowing Policy and Procedure
- Anti-Bullying Policy
- Exclusion Policy
- ICT and E-Safety Policy

Roles and responsibilities

1.9 The **governing board** has a duty to:

- Ensure that the school complies with its duties under the above child protection and safeguarding legislation.
- Guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times.
- Guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children' (2018).
- Confirm that the school's safeguarding arrangements take into account the procedures and practices of the Local Authority (Central Bedfordshire and Bedford Borough) as part of the inter-agency safeguarding procedures.
- Understand the local criteria for action and the local protocol for assessment, and ensure these are reflected in the school's policies and procedures.
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions.
- Ensure that staff members have due regard to relevant data protection principles which allow them to share personal information.
- Ensure that a member of the governing board is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the headteacher or another governor.
- Guarantee that there are effective child protection policies and procedures in place together with a staff code of conduct.
- Ensure that there is a senior board level lead responsible for safeguarding arrangements and meeting with the DSL at least once a term.
- Appoint a member of staff from the Senior Leadership Team to the role of DSL as an explicit part of the role-holder's job description.
- Appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s).

- Ensure all relevant persons are aware of the school's local safeguarding arrangements, including the governing board itself, the SLT and DSL.
- Make sure that students are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- Adhere to statutory responsibilities by conducting pre-employment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required.
- Ensure that staff members are appropriately trained to support students to be themselves at school, e.g. if they are LGBTQ+.
- Guarantee that volunteers are appropriately supervised.
- Make sure that at least one person on any appointment panel has undertaken safer recruitment training.
- Ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required, but at least annually.
- Certify that there are procedures in place to handle allegations against members of staff or volunteers.
- Confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned.
- Guarantee that there are procedures in place to handle students' allegations against other students.
- Ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff.
- Ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.
- Make sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students.
- Guarantee that there are systems in place for students to express their views and give feedback.
- Establish an early help procedure and ensure all staff understand the procedure and their role in it.
- Appoint a designated teacher to promote the educational achievement of Looked After Child and ensure that this person has undergone appropriate training.
- Ensure that the designated teacher works with the Virtual School Head to discuss how the student premium funding can best be used to support LAC.
- Introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities.

- Make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the student's legal status, contact details and care arrangements.
- Put in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation, and prevent the risk of their disappearance in future.
- Ensure that all members of the governing board have been subject to an enhanced DBS check.
- Create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

1.10 The **headteacher** has a duty to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession.
- Ensure that the policies and procedures adopted by the governing board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members.
- Provide staff, upon induction, with the Safeguarding Children Policy, Staff Code of Conduct, part one of the 'Keeping children safe in education' (KCSIE) guidance, Behaviour for Learning Policy, the Attendance Policy, online safety training, and the identity of the DSL and any deputies.
- Ensure the DSL has adequate training, supervision and time to undertake the responsibilities of the role.

1.11 The **Designated Safeguarding lead** has a duty to:

- Understand and keep up-to-date with local safeguarding arrangements.
- Act as the main point of contact with the three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups).
- Refer all cases of suspected abuse to children's social care services (CSCS), the LA designated officer (LADO – lado@centralbedfordshire.gov.uk - **0300 300 4331/5026**) for child protection concerns, the DBS, and the police in cases where a crime has been committed.
- Refer cases of radicalisation to the Channel programme (https://www.gov.uk/government/publications/channel-guidance).
- Liaise with the headteacher to inform them of safeguarding issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Liaise with the deputy DSL(s) to ensure effective safeguarding outcomes.
- Act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies.
- Understand the assessment process for providing early help and intervention.
- Support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate.

- Keep cases of early help under constant review and refer them to the CSCS if the situation does not appear to be improving.
- Have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so.
- Ensure each member of staff has access to and understands the school's Child Protection and Safeguarding Policy and procedures – this will be discussed during the staff induction process.
- Be alert to the specific requirements of children in need, including those with SEND and young carers.
- Keep detailed, accurate and secure records of concerns and referrals.
- Secure access to resources and attend any relevant training courses.
- Encourage a culture of listening to children and taking account of their wishes and feelings.
- Work with the governing board to ensure the school's Child Protection and Safeguarding Policy is reviewed annually and the procedures are updated regularly.
- Ensure the school's Child Protection and Safeguarding Policy is available publicly, and parents are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals.
- Link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding.
- Ensure that a student's child protection file is copied when transferring to a new school.
- Be available at all times during school hours to discuss any safeguarding concerns.
- Hold the details of the LA personal advisor and liaise with them as necessary.
- The designated teacher has a responsibility for promoting the educational achievement of LAC and previously LAC, and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Be aware of students who have a social worker.
- Promote educational outcomes by sharing information about the welfare, safeguarding and child protection issues of students with teachers and school leadership.

1.12 Other staff members have a responsibility to:

- Safeguard students' wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Provide a safe environment in which students can learn.
- Act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse.

- Maintain an attitude of 'it could happen here' where safeguarding is concerned.
- Be aware of the signs of abuse and neglect.
- Be aware of the early help process and understand their role in it.
- Act as the lead professional in undertaking an early help assessment, where necessary.
- Be aware of, and understand, the process for making referrals to CSCS, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments.
- Be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal, and information that should be treated as special category data.
- Make a referral to CSCS and/or the police immediately, if at any point there is a risk of immediate serious harm to a child.
- Be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected.
- Support social workers in making decisions about individual children, in collaboration with the DSL.
- Maintain appropriate levels of confidentiality when dealing with individual cases, and always act in the best interest of the child.
- Follow the school's procedure for, and approach to, preventing radicalisation as outlined in the Preventing Extremism and Radicalisation Policy.
- Challenge senior leaders over any safeguarding concerns, where necessary.

Inter-agency working

1.13 The school contributes to inter-agency working as part of its statutory duty.

1.14 The school is aware of and will follow the local safeguarding arrangements.

1.15 The school will work with CSCS, the police, health services and other services to protect the welfare of its students, through the early help process and by contributing to inter-agency plans to provide additional support.

1.16 Where a need for early help is identified, the school will allow access for CSCS from the host LA and, where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment.

1.17 The school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for early help.

1.18 Considering 4.3, staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm.

1.19 Staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students.

1.20 If staff members are in doubt about sharing information, they will speak to the DSL or deputy DSL.

1.21 The school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

Abuse and neglect

1.22 All members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another.

1.23 All staff members will be aware of the indicators of abuse and the appropriate action to take following a student being identified as at potential risk of abuse or neglect.

1.24 When identifying students at risk of potential harm, staff members will look out for a number of indicators including, but not limited to, the following:

- Injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
- Lack of concentration and acting withdrawn
- Knowledge ahead of their age, e.g. sexual knowledge.
- Use of explicit language
- Fear of abandonment
- Depression and low self-esteem
- Anxiety

1.25 All staff at Holywell are 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. School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy via CPOMS.

1.26 At Holywell, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most students. This may mean that they more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

1.27 All members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting.

1.28 All staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in the school's Anti-Bullying Policy.

1.29 All staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting, and will understand that these put students in danger.

1.30 Staff members will be aware of the effects of a student witnessing an incident of abuse, such as witnessing domestic violence at home.

Types of abuse and neglect

1.31 **Abuse:** A form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet.

1.32 **Physical abuse:** A form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent fabricates the symptoms of, or deliberately induces, illness in a child.

1.33 **Emotional abuse:** A form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them, or often making them feel as though they are in danger.

1.34 **Sexual abuse:** A form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence, and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching, or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways.

1.35 **Neglect:** A form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

FGM

1.36 For the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs.

1.37 FGM is considered a form of abuse in the UK and is illegal.

1.38 All staff will be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police.

1.39 Teaching staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence, of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

1.40 There are a range of potential indicators that a student may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk to the student.

1.41 Victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on them, so staff will be sensitive when broaching the subject.

1.42 Indicators that may show a heightened risk of FGM include the following:

- The socio-economic position of the family and their level of integration into UK society
- Any girl with a mother or sister who has been subjected to FGM
- Any girl withdrawn from PSHE

1.43 Indicators that may show FGM could take place soon include the following:

- When a female family elder is visiting from a country of origin
- A girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
- A girl may request help from a teacher if she is aware or suspects that she is at immediate risk
- A girl, or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent

1.44 Staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others, and criminal investigations can begin.

1.45 Indicators that FGM may have already taken place include the following:

- Difficulty walking, sitting or standing
- Spending longer than normal in the bathroom or toilet
- Spending long periods of time away from a classroom during the day with bladder or menstrual problems
- Prolonged or repeated absences from school followed by withdrawal or depression
- Reluctance to undergo normal medical examinations
- Asking for help, but not being explicit about the problem due to embarrassment or fear

1.46 Teachers will not examine students, and so it is rare that they will see any visual evidence, but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve CSCS as appropriate.

1.47 FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing.

1.48 All forms of Honour Based Abuse (HBA) are forms of abuse and will be treated and escalated as such.

1.49 Staff will be alert to the signs of HBA, including concerns that a child is at risk of HBA, or has already suffered from HBA, and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

Forced marriage

1.50 For the purpose of this policy, a **"forced marriage"** is defined as a marriage that is entered into without the full and free consent of one or both parties, and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Forced marriage is classed as a crime in the UK.

1.51 As part of HBV, staff will be alert to the signs of forced marriage including, but not limited to, the following:

- Becoming anxious, depressed and emotionally withdrawn with low self-esteem
- Showing signs of mental health disorders and behaviours such as self-harm or anorexia
- Displaying a sudden decline in their educational performance, aspirations or motivation
- Regularly being absent from school
- Displaying a decline in punctuality
- An obvious family history of older siblings leaving education early and marrying early

1.52 If staff members have any concerns regarding a child who may have undergone, is currently undergoing, or is at risk of, forced marriage, they will speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

Child Criminal Exploitation (including Child Sexual Exploitation (CSE) and Serious Violence

1.53 For the purpose of this policy, **"child sexual exploitation"** is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:

- In exchange for something the victim needs or wants
- For the financial advantage or increased status of the perpetrator or facilitator

1.54 CCE and CSE do not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.

1.55 CCE and CSE can include Domestic Abuse.

1.56 The school has adopted the following procedure for handling cases of CCE and CSE, as outlined by the DfE:

Identifying cases

1.57 School staff members are aware of and look for the key indicators of CCE and CCSE; these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons

- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol

Referring cases

1.58 Where CSE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

1.59 The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Homelessness

1.60 The DSL and deputy(s) will be aware of the contact details and referral routes in to the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

1.61 Indicators that a family may be at risk of homelessness include the following:

- Household debt
- Rent arrears
- Domestic abuse
- Anti-social behaviour
- Any mention of a family moving home because “they have to”

1.62 Referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm.

County lines criminal activity

1.63 For the purpose of this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns.

1.64 Staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs.

1.65 Staff members who suspect a student may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.

1.66 The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.

1.67 Indicators that a student may be involved in county lines active include the following:

- Persistently going missing or being found out of their usual area
- Unexplained acquisition of money, clothes or mobile phones

- Excessive receipt of texts or phone calls
- Relationships with controlling or older individuals or groups
- Leaving home without explanation
- Evidence of physical injury or assault that cannot be explained
- Carrying weapons
- Sudden decline in school results
- Becoming isolated from peers or social networks
- Self-harm or significant changes in mental state
- Parental reports of concern

Serious violence

1.68 Through training, all staff will be made aware of the indicators which may signal a student is at risk from, or is involved with, serious violent crime. These indicators include, but are not limited to, the following:

- Increased absence from school
- A change in friendships
- New relationships with older individuals or groups
- A significant decline in academic performance
- Signs of self-harm
- A significant change in wellbeing
- Signs of assault
- Unexplained injuries
- Unexplained gifts or new possessions

1.69 Staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violent crime. These risk factors include, but are not limited to, the following:

- A history of committing offences
- Substance abuse
- Anti-social behaviour
- Truancy
- Peers involved in crime and/or anti-social behaviour

1.70 Staff members who suspect a student may be vulnerable to, or involved in, serious violent crime will immediately report their concerns to the DSL.

Students with family members in prison

1.71 Students with a family member in prison will be offered pastoral support as necessary.

1.72 They will receive a copy of '[Are you a young person with a family member in prison]' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court

1.73 Students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support.

14.2 Students will also be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns.

Contextual safeguarding

1.74 Safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and their deputy(s), will always consider the context of incidents – this is known as contextual safeguarding.

1.75 Assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare.

1.76 The school will provide as much contextual information as possible when making referrals to CSCS.

Preventing radicalisation

1.77 For the purpose of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies.

1.78 Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties.

1.79 The school will actively assess the risk of students being drawn into terrorism.

1.80 Staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection.

1.81 Staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements as appropriate.

1.82 The school will ensure that they engage with parents and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms.

1.83 Any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

1.84 The DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. The DSL will hold formal training sessions with all members of staff to ensure they are aware of the risk indicators and their duties regarding preventing radicalisation.

Risk indicators of vulnerable students

1.85 Indicators of an identity crisis include the following:

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

1.86 Indicators of a personal crisis include the following:

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

1.87 Indicators of vulnerability through personal circumstances includes the following:

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

1.88 Indicators of vulnerability through unmet aspirations include the following:

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality:
- Experiences of dealing with the police
- Involvement with criminal groups

Making a judgement

1.89 When making a judgement, staff will ask themselves the following questions:

- Does the student have access to extremist influences?
- Does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the student has been, or is likely to be, involved with extremist organisations?
- Is the student known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the student sympathise with or support illegal/illicit groups?
- Does the student support groups with links to extremist activity?
- Has the student encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the student?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the student?

- Has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?
- Has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the student vocally support terrorist attacks, either verbally or in their written work?
- Has the student witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the student travelled for extended periods of time to international locations?
- Has the student employed any methods to disguise their identity?
- Does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the student display a lack of affinity or understanding for others?
- Is the student the victim of social isolation?
- Does the student demonstrate a simplistic or flawed understanding of religion or politics?
- Is the student a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the student have insecure, conflicted or absent family relationships?
- Has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?

1.90 Critical indicators include where the student is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

1.91 Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

1.92 The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

Channel programme

1.93 Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities.

1.94 In cases where the school believes a student is potentially at serious risk of being radicalised, the headteacher or DSL will contact the Channel programme.

1.95 The DSL will also support any staff making referrals to the Channel programme.

1.96 The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

1.97 The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school.

1.98 The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS.

Extremist speakers

1.99 The Guest Speaker Policy will prevent speakers who may promote extremist views from using the school premises.

Building children's resilience

1.100 The school will:

- Provide a safe environment for debating controversial issues.
- Promote fundamental British values, alongside students' spiritual, moral, social and cultural development.
- Allow students time to explore sensitive and controversial issues.
- Provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing.
- Equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments.
- Teach students about how democracy, government and law making/enforcement occur.
- Teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

1.101 The school will utilise the following resources when preventing radicalisation:

- Local safeguarding arrangements
- Local police (contacted via 101 for non-emergencies)
- The DfE's dedicated helpline (020 7340 7264)
- The Channel awareness programme
- The Educate Against Hate website

A child missing from education

1.102 A child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation.

1.103 Staff will monitor students that go missing from the school, particularly on repeat occasions, and report them to the DSL following normal safeguarding procedures, in accordance with the Attendance Policy.

1.104 The school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

1.105 Students are placed on the admissions register at the beginning of the first day that is agreed by the school, or when the school has been notified that the student will first be attending.

1.106 The school will notify the LA within five days of when a student's name is added to the admissions register.

1.107 The school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents when any changes occur.

1.108 Two emergency contact details will be held for each student where possible.

1.109 Staff will monitor students who do not attend the school on the agreed date and will notify the LA at the earliest opportunity.

1.110 If a parent notifies the school that their child will live at a different address, the school will record the following information on the admissions register:

- The full name of the parent with whom the student will live
- The new address
- The date from when the student will live at that address

1.111 If a parent notifies the school that their child will be attending a different school, or is already registered at a different school, the following information will be recorded on the admissions register:

- The name of the new school

- The date on which the student first attended, or is due to attend, that school

1.112 Where a student moves to a new school, the school will use a secure internet system to securely transfer students' data.

1.113 To ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Student Registration) (England) Regulations 2006 (as amended), where they:

- Have been taken out of the school by their parents, and are being educated outside the national education system, e.g. home education.
- Have ceased to attend the school, and no longer live within a reasonable distance of the premises.
- Have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age, and their parent has not indicated the intention to the student continuing to attend school after ceasing to be of compulsory school age.
- Have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- Have been permanently excluded.

1.114 The school will also remove a student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

1.115 If a student is to be removed from the admissions register, the school will provide the LA with the following information:

- The full name of the student
- The full name and address of any parent with whom the student lives
- At least one telephone number of the parent with whom the student lives
- The full name and address of the parent with whom the student is going to live, and the date that the student will start living there, if applicable
- The name of the student's new school and the student's expected start date there, if applicable
- The grounds for removal from the admissions register under regulation 8 of the Education (Student Registration) (England) Regulations 2006 (as amended)

1.116 The school will work with the LA to establish methods of making returns for students back into the school.

1.117 The school will highlight to the LA where they have been unable to obtain necessary information from parents, e.g. where an address is unknown.

1.118 The school will also highlight any other necessary contextual information including safeguarding concerns

Students with SEND

1.119 The school recognises that students with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of students.

1.120 Staff will be aware of the following:

- Certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability, however, it should never be assumed that a child's indicators relate only to their disability
- Students with SEND can be disproportionally impacted by things like bullying, without outwardly showing any signs
- Communication barriers may exist, as well as difficulties in overcoming these barriers

1.121 When reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration.

1.122 When managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCO, as well as the student's family where appropriate, to ensure that the student's needs are effectively met.

Alternative provision

1.123 The school will remain responsible for a student's welfare during their time at an alternative provider.

1.124 When placing a student with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

Private fostering

1.125 Where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks.

Concerns about a student

1.126 If a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or a deputy.

1.127 All staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing.

1.128 Where the DSL is not available to discuss the concern with, staff members will contact the deputy DSL with the matter.

1.129 If a referral is made about a child by anyone other than the DSL, the DSL will be informed as soon as possible.

1.130 The LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer.

1.131 Staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student.

1.132 If the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student.

1.133 If early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered.

1.134 All concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL and kept securely in a locked cabinet in the deputy headteacher's office and also on the CPOMs software.

1.135 If a student is in immediate danger, a referral will be made to CSCS and/or the police immediately.

1.136 If a student has committed a crime, such as sexual violence, the police will be notified without delay.

1.137 Where there are safeguarding concerns, the school will ensure that the student's wishes are always taken into account, and that there are systems available for students to provide feedback and express their views.

1.138 When responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed.

1.139 An inter-agency assessment will be undertaken where a child and their family could benefit from coordinated support from more than one agency. These assessments will identify what help the child and family require in preventing needs escalating to a point where intervention would be needed.

Early help

1.140 Early help means providing support as soon as a problem emerges, at any point in a child's life.

1.141 Any student may benefit from early help, but in particular staff will be alert to the potential need for early help for students who:

- Have SEND (whether or not they have a statutory EHC plan).
- Are young carers.
- Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups.
- Are frequently missing/going missing from care or from home.
- Misuse drugs or alcohol.
- Are at risk of modern slavery, trafficking or exploitation.
- Are in a family circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse.
- Are returned home to their family from care.
- Show early signs of abuse and/or neglect.
- Are at risk of being radicalised or exploited.
- Are privately fostered.

1.142 Early help will also be used to address non-violent harmful sexual behaviour to prevent escalation.

1.143 All staff will be made aware of the local early help process and understand their role in it.

1.144 The DSL will take the lead where early help is appropriate.

Managing referrals

1.145 The reporting and referral process will be followed accordingly.

1.146 All staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed.

1.147 When making a referral to CSCS or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so.

1.148 The DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved.

1.149 The DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings, and to obtain help and support as necessary.

1.150 Where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. **Where this information is not forthcoming, the referrer will contact the assigned social worker for more information.**

1.151 The school will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by CSCS.

1.152 Where CSCS decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the student is at risk of harm.

1.153 Where CSCS decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support.

1.154 At all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken unless this may cause greater harm to them.

1.155 The school will seek to discuss concerns with parents/carers at the earliest opportunity unless doing so would put the student or others at potential risk of harm.

1.156 The school will work closely with parents to ensure that the student, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

Concerns about staff members, governors and /or volunteers and safeguarding practices

1.157 If a staff member has concerns about another member of staff, it will be raised with the headteacher.

1.158 If the concern is with regards to the headteacher, it will be referred to the chair of governors.

1.159 Any concerns regarding the safeguarding practices at the school will be raised with the SLT, and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy.

1.160 If a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the Chair of Governors, the NSPCC whistleblowing helpline (0800 028 0285) or the Local Authority Designated Officer lado@centralbedfordshire.gov.uk - **0300 300 4331/5026**.

1.161 Any allegations of abuse made against staff members will be dealt with in accordance with the school's Allegations of Abuse Against Staff Policy.

Dealing with allegations of abuse against staff

1.162 All allegations will be dealt with in line with the school's Allegations of Abuse Against Staff Policy, a copy of which will be provided to, and understood by, all staff.

1.163 Where an allegation is substantiated, and the individual is dismissed or resigns, the school will refer it to the DBS. They will also consider referring the matter to the TRA for consideration for a prohibition order.

1.164 If a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to CSCS.

1.165 The school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

Allegations of abuse against other students (peer-on-peer abuse)

Sexual harassment

1.166 Sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a student's dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence.

1.167 Sexual harassment includes:

- Sexual comments.
- Sexual "jokes" and taunting.
- Physical behaviour, such as deliberately brushing against another student.
- Online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation,

coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual violence

1.168 Sexual violence refers to the three following offences:

- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- Harmful sexual behaviours

1.169 The term "**harmful sexual behaviour"** is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.

1.170 Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND.

A preventative approach

1.171 In order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.

1.172 The school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and

group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- Healthy relationships
- Respectful behaviour
- Gender roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- That sexual violence and sexual harassment is always wrong
- Addressing cultures of sexual harassment

1.173 Students will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

Online safety

1.174 As part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online.

1.175 Through training, all staff members will be made aware of the following:

- Student attitudes and behaviours which may indicate they are at risk of potential harm online
- The procedure to follow when they have a concern regarding a student's online activity

1.176 Online safety during remote learning sessions id addressed in the School's "Contingency plans for education at Holywell during Coronavirus closure or lockdown".

1.177 The school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what students can be taught regarding online teaching.

Mobile phone and camera safety

1.178 Staff members will not use personal mobile phones or cameras when students are present.

1.179 Staff may use mobile phones on school premises outside of working hours when no students are present.

1.180 Staff may use mobile phones in the staffroom during breaks and non-contact time.

1.181 Mobile phones will be safely stored and in silent mode whilst students are present.

1.182 Staff will use their professional judgement in emergency situations.

1.183 Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when students are present.

1.184 Mobile devices will not be used to take images or videos of students or staff in any circumstances.

1.185 The sending of inappropriate messages or images from mobile devices is strictly prohibited.

1.186 Staff who do not adhere to this policy will face disciplinary action.

1.187 **ICT technicians** and the **e-safety officer** will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from an **ICT technician** or the **e-safety officer**.

1.188 The school will adhere to the terms of the **E-Safety Policy** at all times.

1.189 Photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the school's **Data Protection Policy**.

1.190 The DPO will oversee the planning of any events where photographs and videos will be taken.

1.191 Where photographs and videos will involve LAC students, adopted students, or students for whom there are security concerns, the **headteacher** will liaise with the **DSL** to determine the steps involved.

1.192 The DSL will, in known cases of a student who is a LAC or who has been adopted, liaise with the student's social worker, carers or adoptive parents to assess the needs and risks associated with the student.

1.193 The school will adhere to its **Photography and Videos Policy** at all times.

1.194 Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the **Allegations of Abuse Against Staff Policy**.

Upskirting

1.195 Under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing, or enabling another person to observe, the victim's genitals or buttocks (whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose.

1.196 A "specified purpose" is namely:

- Obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim's genitals, buttocks or underwear).
- To humiliate, distress or alarm the victim.

1.197 "Operating equipment" includes enabling, or securing, activation by another person without that person's knowledge, e.g. a motion activated camera.

1.198 Upskirting will not be tolerated by the school.

1.199 Any incidents of upskirting will be reported to the **DSL** who will then decide on the next steps to take, which may include police involvement.

Sports clubs and extra-curricular activities

1.200 The school will work in collaboration with external bodies, e.g. charities or companies, to effectively safeguard students and adhere to local safeguarding arrangements.

1.201 The school will ensure that paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of students.

1.202 Paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to CSCS or the police, if necessary.

1.203 All national governing bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Safer recruitment

1.204 An enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in 'regulated activity' if, as a result of their work, they:

- Are responsible on a daily basis for the care or supervision of children.
- Regularly work in the school at times when children are on the premises.
- Regularly come into contact with children under 18 years of age.

1.205 The DfE's DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria.

Pre-employment checks

1.206 The governing board will ensure that the school has robust systems in place to assess the suitability of prospective employees by:

- Verifying the candidate's identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available.
- Obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity.
- Obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available.
- Checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System.
- Verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role.
- Checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the Gov.UK website will be followed.
- If the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for

any teacher sanctions or restrictions that an EEA professional regulating authority has imposed.

- Checking professional experience, QTS and qualifications as appropriate using Teacher Services.
- Confirming that an individual taking up a management position is not subject to a section 128 direction.

1.207 An enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission.

Governors

1.208 The trust requires enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Before an individual becomes a trustee, the school will carry out an enhanced DBS check and confirm their identity. Where a trustee also engages in regulated activity, a barred list check will also be requested. An additional check is required for those in management positions, to ensure that they are not prohibited under section 128 provisions. Where a barred list check has been performed, the section 128 direction will also be shown and will not require a separate check. If the individual lives or has lived outside of the UK, consideration will be given as to further checks that may be necessary.

Barred list check

1.209 An enhanced DBS check may be requested for anyone working in school that is not in regulated activity but does not have a barred list check.

1.210 If there are concerns about an applicant, an enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment.

1.211 Written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete.

References

1.212 References will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment.

1.213 References will only be accepted from a senior person and not from a colleague.

1.214 References will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily.

1.215 References will be obtained prior to interviews taking place and discussed during interviews.

1.216 Open testimonials will not be considered.

1.217 Information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post.

1.218 Information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source.

Volunteers

1.219 No volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained.

1.220 An enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis.

1.221 Personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability.

1.222 A supervised volunteer who regularly teaches or looks after children is not in regulated activity.

1.223 The school will obtain an enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care.

1.224 Unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked.

1.225 A risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check.

Contractors

1.226 The school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check.

1.227 Checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.

1.228 Contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school.

Data retention

1.229 DBS certificates will be securely destroyed as soon as practicable, but not retained for longer than six months from receipt.

1.230 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years.

Referral to the DBS

1.231 The school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child, or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended.

Ongoing suitability

1.232 Following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk.

Single central record (SCR)

1.233 The school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school.

1.234 All members of the proprietor body are also recorded on the SCR.

1.235 The following information is recorded on the SCR:

- An identity check
- A barred list check
- An enhanced DBS check
- A prohibition from teaching check
- A section 128 check
- A check of professional qualifications
- A check to determine the individual's right to work in the UK
- Additional checks for those who have lived or worked outside of the UK

1.236 For agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all of the necessary checks have been conducted and the date that confirmation was received.

1.237 If any checks have been conducted for volunteers, this will also be recorded on the SCR.

1.238 If risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded. The governing body will ensure the SCR is checked not less than once a term.

Training

1.239 Staff members will undergo safeguarding and child protection training at induction, which will be regularly updated on a termly basis or whenever there is a change in legislation.

1.240 The induction training will cover:

- The Safeguarding Children Policy
- The Behaviour for Learning Policy
- The Staff Code of Conduct
- The safeguarding response to children who go missing from education
- The identity of the DSL and any deputies
- The role of the DSL and deputy DSLs

1.241 All staff members will also receive regular safeguarding and child protection updates as required, but at least annually.

1.242 Training will cover, at a minimum:

- The issues surrounding sexual violence and sexual harassment.
- Contextual safeguarding.
- How to keep previously LAC safe.
- Child criminal exploitation and the need to refer cases to the National Referral Mechanism.

1.243 Staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school.

1.244 The DSL and deputy DSL will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role.

1.245 The DSL and deputy DSL will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff.

1.246 The DSL and their deputy(s) will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online

1.247 Online training will also be conducted for all staff members and Governors as part of the overall safeguarding approach.

Monitoring and review

1.248 This policy is reviewed annually by the DSL and the headteacher.

1.249 Any changes made to this policy by the headteacher and DSL will be communicated to all members of staff.

1.250 All members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme.

1.251 The next scheduled review date for this policy is November 2021.

Staff Disqualification Declaration

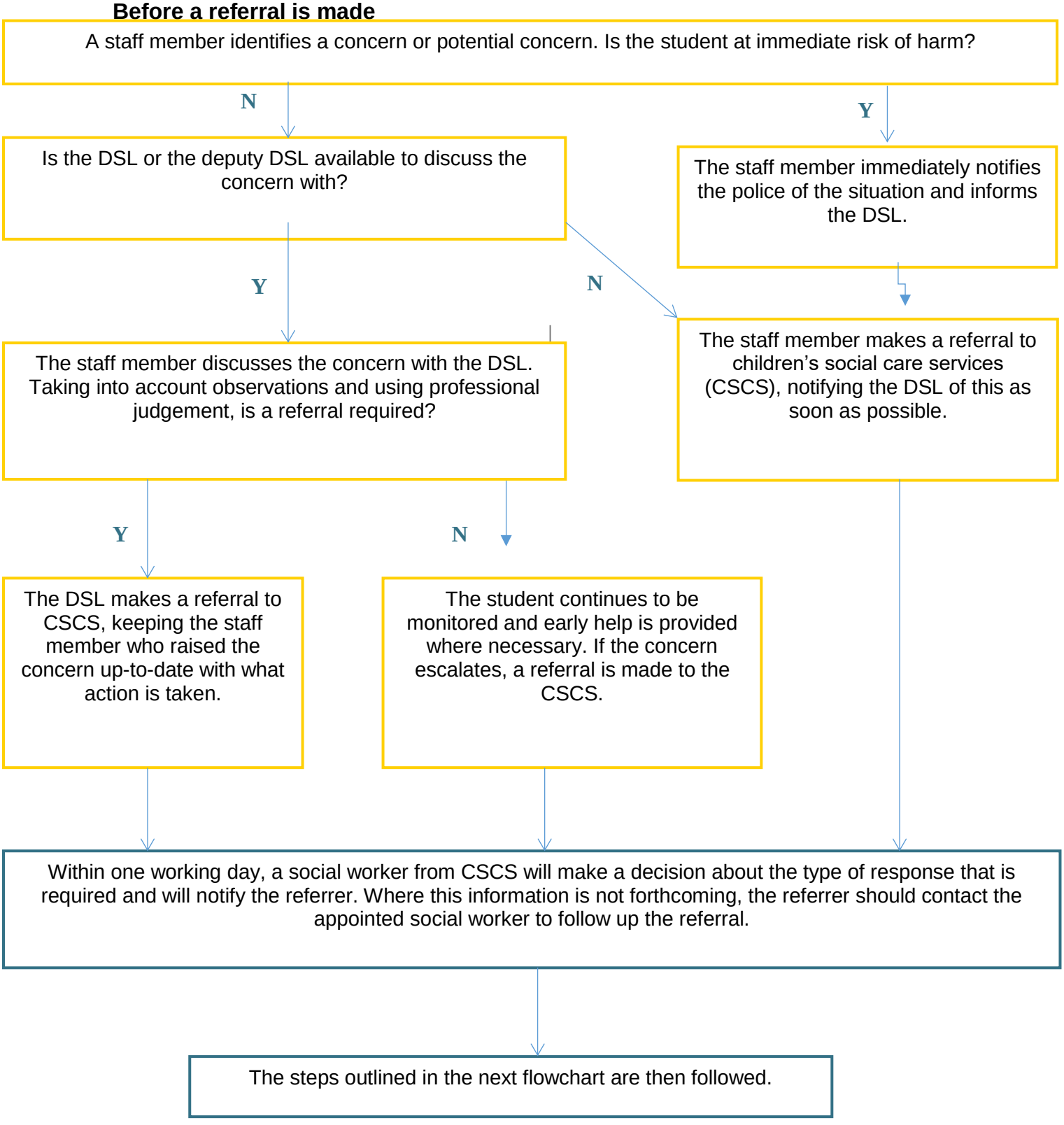
Name of school:		
Name of staff member:	Position:	
Orders and other restrictions		**Yes/No**
Have any orders or other determinations related to childcare been made in respect of you?		
Have any orders or other determinations related to childcare been made in respect of a child in your care?		
Have any orders or other determinations been made which prevent you from being registered in relation to childcare, children's homes or fostering?		
Are there any other relevant orders, restrictions or prohibitions in respect of you as set out in Schedule 1 of the Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018?		
Are you barred from working with children by the DBS?		
Are you prohibited from teaching?		
Specified and statutory offences		
Have you ever been cautioned, reprimanded, given a warning for or convicted of:		
• Any offence against or involving a child?		
• Any violent or sexual offence against an adult?		
• Any offence under The Sexual Offences Act 2003?		
• Any other relevant offence?		
Have you ever been cautioned, reprimanded for or convicted of a similar offence in another country?		
Provision of information		
If you have answered yes to any of the questions above, provide details below. You may provide this information separately, but you must do so without delay.		
Details of the order restriction, conviction or caution:		
The date(s) of the above:		
The relevant court(s) or body/bodies):		
You should also provide a copy of the relevant order, caution, conviction, etc. In relation to cautions/convictions, a DBS Certificate may be provided.		
Declaration		
In signing this form, I confirm that the information provided is true to the best of my knowledge and that: • I understand my responsibilities to safeguard children. • I understand that I must notify my headteacher immediately of anything that affects my suitability to work within the school. This includes any cautions, warnings, convictions, orders or other determinations made in respect of me that would render me disqualified from working with children.		
Signed:		
Print name:		
Date:		

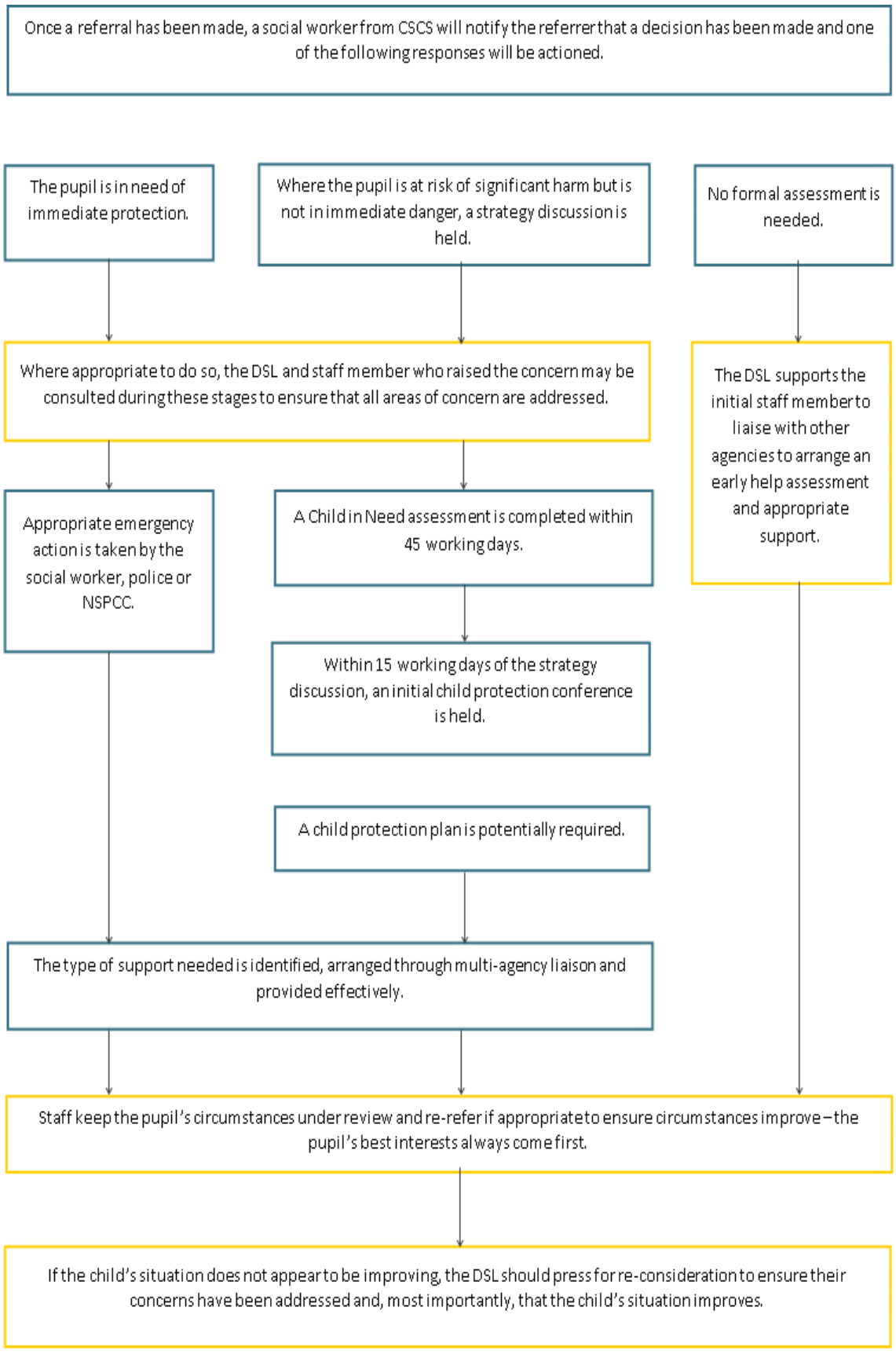
Safeguarding Reporting Process

The process outlined within the first section should be followed where a staff member has a safeguarding concern about a child. Where a referral has been made, the process outlined in the 'After a referral is made' section should be followed.

The actions taken by the school are outlined in yellow, whereas actions taken by another agency are outlined in blue.

Before a referral is made




Once a referral has been made, a social worker from CSCS will notify the referrer that a decision has been made and one of the following responses will be actioned.
The pupil is in need of immediate protection.
Where the pupil is at risk of significant harm but is not in immediate danger, a strategy discussion is held.
No formal assessment is needed.
Where appropriate to do so, the DSL and staff member who raised the concern may be consulted during these stages to ensure that all areas of concern are addressed.
The DSL supports the initial staff member to liaise with other agencies to arrange an early help assessment and appropriate support.
Appropriate emergency action is taken by the social worker, police or NSPCC.
A Child in Need assessment is completed within 45 working days.
Within 15 working days of the strategy discussion, an initial child protection conference is held.
A child protection plan is potentially required.
The type of support needed is identified, arranged through multi-agency liaison and provided effectively.
Staff keep the pupil's circumstances under review and re-refer if appropriate to ensure circumstances improve – the pupil's best interests always come first.
If the child's situation does not appear to be improving, the DSL should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves.

Contacts and Advice

Local Area Designated Officer

lado@centralbedfordshire.gov.uk - **0300 300 4331/5026**

Expert organisations

- Barnardo's
- Lucy Faithfull Foundation
- NSPCC
- Rape Crisis
- University of Bedfordshire: Contextual Safeguarding
- UK Safer Internet Centre

Support for victims

- Anti-Bullying Alliance
- MoJ Victim Support
- Rape Crisis
- The Survivor's Trust
- Victim Support

Toolkits

- Brook
- NSPCC
- Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire

Further information on confidentiality and information sharing

- Gillick Competency Fraser Guidelines
- Government Information Sharing Advice
- Information Commissioner's Office: Education
- NSPCC: Things to Know and Consider

Further information on sexting

- UK Council for Child Internet Safety: Sexting Advice
- London Grid for Learning – Collection of Advice

Support for parents

- Parentzone
- Parentsafe – London Grid for Learning
- CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact
- CEOP Thinkuknow – Supporting Positive Sexual Behaviour