

# **Safeguarding and Child Protection Policy 2021-2022**



## **NEWCASTLE PREPARATORY SCHOOL**

Date ratified by the Governing Board: 29/11/2021

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## Key School Contact Details

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## Key External Contact Details

Local Authority Designated Officer (LADO)	Melanie Scott Children's Safeguarding Standards Unit Allendale Road Byker Newcastle upon Tyne NE6 2SZ Email: <a href="mailto:melanie.scott@newcastle.gov.uk">melanie.scott@newcastle.gov.uk</a> Tel: 0191 2774636
Children's social care	Initial Response Service Children's Social Care Civic Centre, Barras Bridge Newcastle upon Tyne NE1 8QH Tel: 0191 277 2500 (out of hours 0191 2787878)
Multi-agency safeguarding hub	Child Protection Queries Karen Simmons - Assistant Director, Children's Social Care Tel: 0191 277 7417 <a href="mailto:karen.simmons@newcastle.gov.uk">karen.simmons@newcastle.gov.uk</a>
Police / law and order	Police Child Abuse and Vulnerable Adults Unit Protecting Vulnerable People Unit Middle Engine Lane Police Station Wallsend NE28 9NT Emergency: 999 Non-emergency: 101 <a href="mailto:specialbranch@northumbria.pnn.police.uk">specialbranch@northumbria.pnn.police.uk</a>  Anti-terrorist hotline : 0800 789 321
NSPCC whistleblowing helpline (Mon-Fri 8am-8pm)	Address: Weston House, 42 Curtain Road, London EC2A 3NH Helpline: 0800 028 0285
Disclosure and Barring Service (DBS)	Address: PO Box 3961, Royal Wootton Bassett, SN4 4HF <a href="mailto:customerservices@dbb.gov">customerservices@dbb.gov</a> Tel: 03000 200190
Teacher Regulation Agency (TRA)	Address: Cheylesmore House, 5 Quinton Rd, Coventry CV1 2WT <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a> Tel. Teacher misconduct: 0207 593 5393
Independent Schools Inspectorate	<a href="mailto:concerns@isi.net">concerns@isi.net</a> Tel: 0207 6000 100

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education. (DfE 2021) (Statutory guidance)
- Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children. (HM Government 2018 (updated December 2020 with factual changes in relation to information sharing, homelessness duty and references to domestic abuse)) (Statutory guidance)
- Sexual violence and harassment between children in schools and colleges (DfE 2021) (Advice for schools)
- Multi-agency statutory guidance on female genital mutilation (HM Government July 2020) (Statutory guidance)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE September 2020) (Statutory guidance)
- Children missing education (DfE September 2016) (Advice for schools)
- Statutory framework for the early years foundation stage (DfE 2021) (Statutory guidance)
- Revised Prevent duty guidance: for England and Wales (HM Government April 2021) (Statutory guidance)
- The Prevent duty: Departmental advice for schools and childcare providers (DfE June 2015) (Advice for schools)
- Guidance for safer working practice for those working with children and young people in education settings. (Safer Recruitment Consortium May 2019) (Addendum in light of Covid published April 2020)
- What to do if you're worried a child is being abused. (HM Government March 2015)
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers (HM Government July 2018)
- Local Authority / Safeguarding Partnership advice and guidance.

## POLICY STATEMENT

Safeguarding and promoting the welfare of children is of paramount importance and is everyone's responsibility.

It is the responsibility of every member of staff, volunteer and regular visitor to our school to ensure that they carry out the requirements of this policy and, at all times, work in a way that will safeguard and promote the welfare of all of the pupils at this school. This includes the responsibility to provide a safe environment in which children can learn.

We recognise that staff at our school play a particularly important role as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating. **All staff are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.** When concerned about the welfare of a child, staff members must always act in the **best interests** of the child.

Our school will establish and maintain an ethos where children feel secure, are encouraged to talk, are listened to and are safe. Children will be able to talk freely to any member of staff at our school if they are worried or concerned about something.

All staff and regular visitors will, through training and induction, know how to recognise indicators of concern, how to respond to a disclosure from a child and how to record and report this information. We will not make promises to any child and we will not keep secrets. Every child will know what the adult will have to do with any information they have chosen to disclose.

Throughout our curriculum we will provide activities and opportunities for children to develop the skills they need to identify risks and stay safe. This will also be extended to include material that will encourage our children to develop essential life skills.

At all times, we will work in partnership and endeavour to establish effective working relationships with parents, carers and colleagues from other agencies in line with Working Together to Safeguard Children (2018) and Local Safeguarding Partners' Procedures.

This policy is reviewed and updated annually and is available on the school website or from the school office.

This policy applies to all staff, children, parents, governors, trustees, volunteers and visitors.

## DEFINITION OF SAFEGUARDING

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.

(KCSIE 2021)

## ABUSE

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

### Abuse and neglect

All staff will be made aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection.

If staff are unsure, they should always speak to the designated safeguarding lead (DSL) or deputy.

Abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with the DSL.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of this environment. All staff, but especially the DSL 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, sexual abuse, mental abuse, serious youth violence and county lines.

Technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of 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.

In all cases, if staff are unsure, they should always speak to the DSL.

Further information about the different kinds of abuse can be found in the appendices.



## PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD

### What staff should do if they have a concern about a child

All staff **must** report **any** concerns they have about a child and not see these as insignificant. Staff should **not** assume a colleague or another professional will take action and share the concern.

On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity.

A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect.

Staff **must** immediately report **any**:

- Suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play / everyday, normal activities
- Explanation given which appears inconsistent or suspicious
- Behaviours which give rise to suspicions that a child may have suffered harm (e.g. worrying drawings, play, actions)
- Concerns that a child may be suffering from inadequate care, ill treatment or emotional maltreatment
- Concerns that a child is presenting signs or symptoms of abuse or neglect
- Significant changes in a child's presentation, including non-attendance
- Hint or disclosure of abuse from any person
- Concerns regarding person(s) who may pose a risk to children (e.g. living in a household with children present)

Children can sometimes show signs or act in ways they hope adults will notice and react to. All staff should be aware of this and remain vigilant.

### What staff should do if a child is in danger or at risk of harm

If staff are concerned that a child could be at risk of harm, they must report to the Designated Safeguarding Lead (DSL) **immediately**.

If this is not possible, they should make a direct referral to children's social care.

### What staff should do if they have a concern about honour-based abuse (HBA), including FGM

If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the DSL. As appropriate, the designated DSL will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care.

Where FGM has taken place, there has been a **mandatory reporting duty** placed on teachers since 31<sup>st</sup> October 2015. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions.

Further information can be found in the Multi-agency statutory guidance on female genital mutilation and the FGM resource pack particularly section 13.

## **Responding to disclosure**

Disclosures or information may be received from children, parents or other members of the public. School recognises that those who disclose such information may do so with difficulty, having chosen carefully to whom they will speak. Accordingly, all staff will handle disclosures with sensitivity.

Such information cannot remain confidential and staff will immediately communicate what they have been told to the DSL.

Staff will not investigate but will, wherever possible, elicit enough information to pass on to the DSL in order that s/he can make an informed decision of what to do next.

Staff will:

- Listen to and take seriously any disclosure or information that a child may be at risk of harm
- Try to ensure that the person disclosing does not have to speak to another member of school staff
- Clarify the information
- Try to keep questions to a minimum and of an 'open' nature e.g. 'Can you tell me what happened?' rather than 'Did x hit you?'
- Try not to show signs of shock, horror or surprise  
Not express feelings or judgments regarding any person alleged to have harmed the child
- Explain sensitively to the person that they have a responsibility to refer the information to the DSL
- Reassure the child that they will be taken seriously, supported and kept safe
- Listen to and take into account (wherever possible) the child's wishes and feelings about the current situation as well as future plans
- Ask any necessary questions to determine the child's wishes and feelings
- Explain that only those who 'need to know' will be told
- Explain what will happen next and how the child will be involved (as appropriate)
- Ensure there is appropriate support made available
- Complete a cause for concern form (Appendix M)

The DSL should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child should be reported without delay and recorded in writing using the agreed procedures (See Appendix M)).

If in doubt about recording requirements, staff should discuss this with the DSL.

Following receipt of any information that raises concern, the DSL will consider what action to take and seek advice from children's social care as required. All concerns, discussions and decisions made, and the reasons for those decisions will be recorded in writing.

It is *not* the responsibility of school staff to investigate welfare concerns or determine the truth of any disclosure or allegation. All staff, however, have a duty to recognise concerns and pass the information on in accordance with these procedures.

All referrals will be made in line with local children's social care procedures.

The school adheres to child protection procedures that have been agreed locally through the Local Safeguarding Partners. Where we identify children and families in need of support, we will carry out our responsibilities in accordance with local threshold guidance.

If, at any point, there is a **risk of immediate serious harm** to a child, a referral should be made to children's social care **immediately**. Anybody can make a referral. If the child's situation does not appear to be improving, then the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the headteacher. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with children's social care, or the police if:

- The situation is an emergency and the DSL, their alternative and the headteacher are all unavailable.
- They are convinced that a direct report is the only way to ensure the child's safety.

Any member of staff, who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy, should raise their concerns with the headteacher or the Chair of Governing Board. If any member of staff does not feel the situation has been addressed appropriately at this point, then they should contact children's social care directly with their concerns.

## **Vulnerability**

Staff should consider children who may be particularly vulnerable to abuse and may require early help.

This could include:

- Any child with additional needs including children with Special Educational Needs / Disabled children (SEND)
- Children facing housing issues such as frequent moves and homelessness
- Those living in families with chaotic lifestyles
- Families with increased stress, parental mental ill health and/or drug and alcohol dependency
- Those children living elsewhere, with friends, relatives, privately fostered, in care or are leaving care
- Asylum seekers / refugees
- Those vulnerable to discrimination on the basis of a protected characteristic
- Children living in households with domestic abuse
- Children at risk of so called 'honour'-based abuse including FGM and forced marriage
- Children with communication difficulties
- Children without adequate parenting / supervision which could lead to abuse, risk-related behaviour and sexual exploitation.

A child who is:

- A young carer
- Showing signs of being drawn into anti-social and / or criminal behaviour / involved in gangs

- Frequently missing from school / home / care home
- Misusing drugs or alcohol
- At risk of being radicalised
- At risk of being exploited (criminal / sexual)
- Showing signs of neglect and abuse
- At risk of modern slavery / trafficking

This is not an exhaustive list but merely an example of vulnerabilities that staff must consider when identifying safeguarding concerns.

## **Early help**

Early help is organised early intervention to provide support as soon as a problem emerges at any point in a child's life.

If early help is appropriate, the DSL (or deputy) 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 and, in some cases, where education is the fundamental factor, act as the lead practitioner.

Early help assessments should be kept under review and referred to children's social care for assessment if the child's situation does not appear to be improving or is getting worse.

## **Statutory children's social care assessments and services**

Concerns about a child's welfare will be referred to the local authority children's social care by the DSL. **Where a child is suffering, or is likely to suffer from harm, a referral to children's social care (and if appropriate the police) will be made immediately.**

Referrals will follow the local authority referral process.

Where a child in school has a Child in Need plan or a Child Protection plan, the school will liaise with children's social care, attend meetings and provide comprehensive and detailed reports.

All reports for Child in Need / Child Protection conferences will be prepared in advance, using the guidance and report template. The information contained in the report will be shared with parents before the conference as appropriate. In order to complete such reports, all relevant information will be sought from staff working with the child in school. All staff should be prepared to contribute to the report writing process.

## PEER ON PEER ABUSE

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. It can happen both inside and outside of school. There may also be reports where the children concerned attend two or more different schools.

- Peer on peer abuse will not be tolerated. All staff will take a zero-tolerance approach to any abusive behaviours and will stop and challenge inappropriate behaviours between peers, many of which may be sexual in nature. Abuse is abuse and should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". We recognise that even if there are no reported cases of peer on peer abuse that such abuse may still be taking place and all staff should be vigilant. A difficult feature of peer on peer abuse is that the perpetrators could be victims themselves and possibly are being abused by other family members, other adults and children. In cases where peer on peer abuse is identified, we will follow our procedures for dealing with concerns, recognising that both the victim and perpetrator will require support.

The school takes the following steps to minimise the risk of peer on peer abuse:

- Ensures staff are aware of the indicators and signs of peer on peer abuse and how to identify them
- Addresses inappropriate behaviour (even if it appears to be relatively minor)
- Has clear robust policies on dealing with key issues of behaviour such as cyber bullying
- Ensures staff and students are aware of the policies
- Ensures robust supervision and be aware of potential risky areas in the school
- Increases supervision during key times
- Takes steps to prevent isolation
- Separates children if needed
- Where risk is identified, a student risk assessment is put in place

The following systems are in place to enable children to confidently report any abuse:

- All children know who they can report to in school
- Worry monsters / confidential boxes in each classroom
- Assemblies, visitors and themed weeks signposting children to key actions / services / people
- Embedded PSHE curriculum with regularly repeated messages about sharing concerns with trusted adults

Each alleged incident will be recorded, investigated and dealt with on an individual basis based on the following principles:

- All information will be recorded in writing using the agreed procedures (See Appendix M)).
- All children involved (victim and alleged perpetrator) in school will be spoken to separately by the DSL
- Where the incident also involves a child at a different establishment the DSL will ensure effective liaison and information sharing
- All children involved (victim and alleged perpetrator) will be appropriately supported throughout the process
- The DSL will balance the child's wishes against their duty to protect the child and other children

- The school will work with our local safeguarding partners where appropriate
- The DSL may need to go against the victim's wishes and make a referral to children's social care or the police. This will be handled sensitively, the reasons explained to the victim and appropriate support made available
- Parents will be informed of the incident and how their child will be dealt with and supported (unless this would put a child at greater risk)

Victims, perpetrators and any other children affected by peer on peer abuse will be supported in the following ways:

- Support will be tailored on a case-by-case basis
- All children involved will be supported by an allocated member of staff
- The needs and wishes of the victim will be taken into account, along with protecting the child.
- Wherever possible, the victim and witnesses will be able to continue their normal routine.
- The victim will never be made to feel they are the problem for making a report or made to feel ashamed for making a report
- All reasonable steps will be taken to protect the anonymity of any children involved in any report of sexual violence or sexual harassment
- Adequate measures will be put in place to protect the children involved and keep them safe
- A needs and risk assessment will be made and a safety plan put in place when required
- Early help, children's social care and other agencies will support where appropriate

Research tells us girls are more frequently identified as being abused by their peers, and girls are more likely to experience unwanted sexual touching in schools. Boys are less likely to report intimate relationship abuse. Boys report high levels of victimisation in areas where they are affected by gangs. There is an increasing evidence base emerging about the sexual exploitation of boys (both by adults and peers). We recognise that both boys and girls experience peer on peer abuse but can do so in different ways.

We recognise that peer on peer abuse can manifest itself in many ways such as:

- Child Sexual Exploitation / Child Criminal Exploitation
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Physical abuse
- Radicalisation
- Abuse in intimate friendships / relationships
- Sexual violence and sexual harassment
- Gang associated and serious violence
- Initiation / hazing type violence and rituals
- Consensual and non-consensual sharing of nudes and semi-nudes images and /or videos
- 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
- Upskirting (which is a criminal offence)

There are a number of factors that make children more vulnerable to peer on peer abuse:

- Experience of abuse within their family
- Living with domestic violence

- Young people in care
- Children who go missing
- Children with additional needs (SEN and/or disabilities).

Some of the reasons why children abuse other children:

- The child may have been emotionally, physically, or sexually abused themselves
- The child may have witnessed physical or emotional abuse
- The child may have viewed sexually explicit / violent movies, video games or other materials
- The child may have just acted impulsively without meaning to harm anyone

Relationship abuse is unacceptable behaviour between any two people.

Further information: [www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/](http://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/)

## **Consensual and non-consensual sharing of nude and semi-nude images and/or videos**

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams by children under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline.

The term 'nudes' is used as it is most commonly recognised by children and more appropriately covers all types of image sharing incidents.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by children who are in relationships, as well as between those who are not in a relationship. It is also possible for a child in a consensual relationship to be coerced into sharing an image with their partner.

Incidents may also occur where:

- Children find nudes and semi-nudes online and share them claiming to be from a peer
- Children digitally manipulate an image of a child into an existing nude online
- Images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts.

Nude or semi-nude images, videos or live streams may include more than one child.

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children complex. There are also a range of risks which need careful management from those working in education settings.

Many professionals may refer to 'nudes and semi-nudes' as:

- Youth produced sexual imagery or 'youth involved' sexual imagery indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children under the age of 18.

- 'Sexting'. Many adults may use this term, however some children interpret sexting as 'writing and sharing explicit messages with people they know' rather than sharing images.
- Image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

### Initial response

When an incident involving nudes and semi-nudes comes to the attention of any member of staff:

- The incident should be referred to the DSL (or Deputy) as soon as possible.
- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- There will be subsequent interviews with the children involved (if appropriate).
- Parents and carers will be informed at an early stage and involved in the process in order to best support the child unless there is good reason to believe that involving them would put the child at risk of harm.
- A referral will be made to children's social care and/or the police immediately if there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process.

A disclosure may not be a single event and the child may share further information at a later stage.

Any direct disclosure by a child should be taken seriously. A child who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in school is a last resort and they may have already tried to resolve the issue themselves.

### Initial review meeting

The initial review meeting will consider the initial evidence and aim to establish:

- Whether there is an immediate risk to any child
- If a referral should be made to the police and/or children's social care
- If it is necessary to view the image(s) in order to safeguard the child – **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 as 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 children involved which would influence risk assessment
- If there is a need to contact another education, setting or individual
- Whether to contact parents or carers of the children involved - in most cases they should be involved

An immediate referral to police and/or children's social care through the MASH or equivalent will be made if at this initial stage:

- The incident involves an adult.
- There is reason to believe that a child has been coerced, blackmailed or groomed, or there are concerns about their capacity to consent (for example, owing to special educational needs).
- What you know 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 images involve sexual acts and any child in the images or videos is under 13.
- You have reason to believe a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes, for example, they are presenting as suicidal or self-harming.

If none of the above apply, the DSL may decide to respond to the incident without involving the police or children's social care. They can still choose to escalate the incident at any time if further information/concerns are disclosed at a later date.

The decision to respond to the incident without involving the police or children's social care will only be made in cases where the DSL is confident that they have enough information to assess the risks to any child involved and the risks can be managed within the school's support and disciplinary framework and, if appropriate, their local network of support.

### **Assessing the risks**

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

When assessing the risks and determining whether a referral is needed, the following should be also considered:

- Why was the nude or semi-nude shared? Was it consensual or was the child put under pressure or coerced?
- Has the nude or semi-nude been shared beyond its intended recipient? Was it shared without the consent of the child who produced the image?
- Has the nude or semi-nude been shared on social media or anywhere else online? If so, what steps have been taken to contain the spread?
- How old are any of the children involved?
- Did the child send the nude or semi-nude to more than one person?
- Do you have any concerns about the child's vulnerability?
- Are there additional concerns if the parents or carers are informed?

The DSL will decide whether a child is at risk of harm, in which case a referral will be appropriate, whether additional information or support is needed from other agencies or whether the education setting can manage the incident and support any child or young person directly. The DSL will always use their professional judgement in conjunction with that of their colleagues to assess incidents.

### **Supporting the child involved**

The DSL or another member of staff (who the child feels more comfortable talking to) will discuss future actions and support with the child. This discussion will take into account the views of the child as well as balancing what are considered to be appropriate actions for responding to the incident.

The purpose of the discussion is to:

- Identify, **without viewing wherever possible**, what the image contains and whether anyone else has been involved.
- Find out whether the image has been shared between two people or shared further. This may be speculative information as images or videos may have been shared more widely than the child or young person is aware of.

- Discuss what actions and support might be needed, including preventing further distribution.

When discussing the sharing of nudes and semi-nudes, the DSL/member of staff will:

- Reassure the child that they are not alone, and the school will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process.
- Recognise the pressures that children can be under to take part in sharing an image and, if relevant, support their parents and carers to understand the wider issues and motivations around this.
- Remain solution-focused and avoid any victim-blaming questions such as 'why have you done this?' as this may prevent the child from talking about what has happened. For example, they will use questions such as 'describe what happened' or 'explain to me who was involved'.
- Help the child to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s).
- Discuss issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens.
- Explain the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
- Signpost to the IWF (Internet Watch Foundation) and [Childline's Report Remove tool](#). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.

### **Informing parents and carers**

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

### **Supporting parents and carers**

Children and young people can be involved in an incident in several different ways. They may lose control of their own image, receive an image of someone else or share an image of another person. In any of these situations, parents and carers may find it difficult to know how to deal with the knowledge that their child has been involved in an incident and may display differing emotions.

Whatever their feelings, it is important that we listen to their concerns and take them seriously. We will also help to reassure parents and carers by explaining that it is normal for young people to be curious about sex.

In all situations, parents or carers will be:

- Given information about the sharing of nudes and semi-nudes, what they can expect to happen next, and who will be their link person within the school.
- Given support to deal with their own feelings of upset and concern including signposting to further resources that can help them to understand the sharing of nudes and semi-nudes or support services they can contact, where appropriate.

- Given support on how to speak to their child about the incident.
- Advised on the law around the sharing of nudes and semi-nudes.
- Kept updated about any actions that have been taken or any support that their child is accessing, unless the child involved has specifically asked for this not to happen and is judged to be old enough to make that informed decision.
- Informed about sources of support for their child, in case they are feeling anxious or depressed about what has happened. This could include speaking to a Childline counsellor [online](#) or on 0800 11 11, in house counselling services where available, or a GP. If they are concerned that their child is suicidal, they should contact 999.
- Directed to [NCA-CEOP](#) if the child discloses any further details to them that may suggest they are being groomed or sexually exploited.

### **Searching devices, viewing and deleting nudes and semi nudes**

Staff and parents or carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below.

Wherever possible, responses to incidents will be based on what DSLs have been told about the content of the imagery.

The decision to view any imagery will be based on the professional judgement of the DSL. Imagery will never be viewed if the act of viewing will cause significant distress or harm to any child or young person involved.

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

- The only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child involved.
- Necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or parent or carer in making a report.
- Unavoidable because a child has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery, then the DSL will:

- Never copy, print, share, store or save them; this is illegal. If this has already happened, we will contact the local police for advice and to explain the circumstances.
- Discuss the decision with the headteacher or a member of the senior leadership team.
- Ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team.
- Ensure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- Wherever possible, make sure viewing takes place on the school premises, ideally in the headteacher or a member of the senior leadership team's office.
- Ensure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- Record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. This will be signed and dated.

- If any devices need to be taken and passed onto the police, the device(s) will be confiscated and the police will be called. The device will be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device will be placed in a secure place, in a locked cupboard until the police are able to come and collect it.

If nudes or semi-nudes have been viewed by a member of staff, either following a disclosure from a child or young person or as a result of a member of staff undertaking their daily role (such as IT staff monitoring school systems), the DSL will make sure that the staff member is provided with appropriate support. Viewing nudes and semi-nudes can be distressing for both children and adults and appropriate emotional support may be required.

In most cases, children and young people will be asked to delete the imagery and to confirm that they have deleted them. They will be given a deadline for deletion across all devices, online storage or social media sites. They will be reminded that possession of nudes and semi-nudes is illegal. They will be informed that if they refuse or it is later discovered they did not delete the imagery, they are continuing to commit a criminal offence and the police may become involved.

All incidents relating to nudes and semi-nudes being shared will be recorded using the school's procedures. Copies of imagery should not be taken.

It is important that children and young people understand the school's policy towards nudes and semi-nudes. The content of this policy and the protocols the school will follow in the event of an incident will be explored as part of teaching and learning. This will reinforce the inappropriate nature of abusive behaviours and reassure children that school will support them if they experience difficulties or have concerns.

**For more information:** [Sharing nudes and semi-nudes: advice for education settings working with children and young people - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people)

## CYBERCRIME

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- Unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
- Denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources.
- Making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home

Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that **Cyber Choices** does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: [Cyber Choices](#), '[NPCC- When to call the Police](#)' and [National Cyber Security Centre - NCSC.GOV.UK](#)

## CHILDREN WITH SPECIAL EDUCATIONAL NEEDS AND DISABILITIES OR CERTAIN HEALTH ISSUES

Children with Special Educational Needs or Disabilities (SEND) or certain health conditions can face additional safeguarding challenges. Children with SEND are three times more likely to be abused than their peers.

Additional barriers can sometimes exist when recognising abuse in SEND children. These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying and harassment, without outwardly showing any signs
- Communication barriers and difficulties overcoming these barriers

Staff will support these children in expressing any concerns they may have and will be particularly vigilant to any signs or symptoms of abuse. The DSL and SENDCO will work together when dealing with reports of abuse involving children with SEND.

## CONTEXTUAL SAFEGUARDING

Safeguarding incidents and/or behaviours can be associated with factors outside school or college and/or can occur between children outside the school or college. All staff should be considering the context within such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

<b>Geographical factors</b>	<b>School's Response</b>
<ul style="list-style-type: none"> <li>• Close proximity city centre and local metro station</li> <li>• The school is a split site with PE and breaks taking place at the Sports Hall</li> </ul>	<ul style="list-style-type: none"> <li>• All classes are educated about 'stranger' danger' and their personal safety.</li> <li>• All classes are supervised to and from the Sports Hall</li> </ul>
<b>Social and economic factors</b>	<b>School's Response</b>
<ul style="list-style-type: none"> <li>• Families experiencing financial difficulties</li> <li>• Mental health issues within a family</li> <li>• Problematic parenting skills</li> </ul>	<ul style="list-style-type: none"> <li>• Supporting parents through bursary scheme. Providing financial long-term and short-term support packages for those families in difficulties</li> <li>• Referral to relevant agencies</li> <li>• Pastoral tracking of children to pick up any concerns i.e. academic pressure being placed on a child, harsh punishments, attendance, over protectiveness and anxiety.</li> <li>• Development of pastoral lead role within school</li> <li>• Regulars meetings of Pastoral team</li> <li>• Individual plans in place for children who are considered at risk.</li> </ul>
<b>Peer Group factors</b>	<b>School's Response</b>
<ul style="list-style-type: none"> <li>• Peer on Peer abuse</li> </ul>	<ul style="list-style-type: none"> <li>• Our curriculum teaches pupils about the issue of 'peer pressure'. Pupils engage in different scenarios and are given choices to make through role play. Pupils are taught to be confident and assertive through our PSHE curriculum. We also engage in a full week of 'anti-bullying' activities and regularly have visitors to speak with children, for example the Police Schools Liaison Officers and NSPCC.</li> <li>• Worry monsters and confidential boxes are placed in each form room for children to share thoughts, worries and report incidents.</li> <li>• Whole school approach to incident recording.</li> </ul>
<b>Home factors</b>	<b>School's Response</b>
<ul style="list-style-type: none"> <li>• Internet Safety</li> <li>• Children with family members in prison</li> <li>• Domestic abuse</li> </ul>	<ul style="list-style-type: none"> <li>• Through our Computing and PSHE curriculums, pupils are taught about online safety. Every pupil has agreed to our 'Acceptable Use Policy'. This proactive and responsive approach allows us to target certain groups of pupils or individuals and gives us the flexibility to respond to school incidents.</li> <li>• E-safety information for parents is always available on ParentApp and an Online Safety hub, which all children and parents have access to, on Teams</li> <li>• Provision of support through referral to counselling services and play therapy</li> <li>• Involvement with Operation Encompass. Focus on healthy relationships and consent within PSHE lessons</li> </ul>

## RECORDING, RECORD KEEPING AND INFORMATION SHARING

**All** concerns, discussions and decisions made, and the reasons for those decisions, will be recorded in writing on the agreed reporting form (Appendix M).

Each record should include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of each action taken, decisions reached and the outcome
- Information from a child written verbatim
- Date and signature / record of who completed the record

If there is any doubt about recording requirements, staff should discuss with the DSL

**All** concerns should be passed to the DSL **without delay**, either written or verbal (followed as soon as possible by a written report)

Child Protection information will be kept in a separate Child Protection file for each child, stored in a separate secure cabinet. Only Child Protection information will be kept in the file and this file will be kept up to date. Records of concern, copies of referrals, invitations to Child Protection conferences, core groups and reports will be stored here. All Child Protection files will include; a chronology, a contents front cover and will record significant events in the child's life.

Child Protection files will be the responsibility of the DSL. Child Protection information will only be shared with relevant staff / agencies on a 'need to know' basis, in the child's interests and on the understanding that it remains strictly confidential.

When a child leaves our school, the DSL will make contact with the DSL at the new school and will ensure that the child protection file is forwarded to the receiving school in an agreed secure manner. We will retain evidence to demonstrate we have acted accordingly when dealing with safeguarding matters and how the file has been transferred; this may be in the form of electronic records or a written confirmation of receipt from the receiving school and/or evidence of recorded delivery. Where a parent elects to remove their child from the school roll to home educate, the school will make arrangements to pass any safeguarding concerns to the Local Authority.

The school is GDPR compliant and information is held and processed in accordance with GDPR regulations.



## PROCEDURES FOR DEALING WITH CONCERNS ABOUT STAFF

### **What staff should do if they have safeguarding concerns about another member of staff**

If staff have safeguarding concerns or an allegation of abuse is made about another member of staff (including supply staff, volunteers and contractors) posing a risk of harm to children this should be reported to the Headteacher. Where there are concerns about the Headteacher, this should be referred to the Chair of the Governing Board.

### **What staff should do if they have concerns about safeguarding practices within the school**

The school requires high standards of conduct, which are set out in the Staff Code of Conduct, nevertheless it will maintain a safeguarding culture which encourages all staff and volunteers to feel able to raise concerns. Where staff have concerns about poor or unsafe practice and potential failures in the school's safeguarding systems, these should be raised following the school's whistleblowing policy.

Where a staff member feels unable to raise an issue with the school, or feels their genuine concerns are not being addressed, other whistleblowing channels are available, such as the NSPCC whistleblowing advice line. Contact details are on the Key External Contacts page.

## MANAGING ALLEGATIONS MADE AGAINST STAFF, VOLUNTEERS AND CONTRACTORS

### **Allegations that meet the harms threshold**

All allegations will be investigated thoroughly and as a matter of urgency. They will be dealt with quickly, fairly and consistently. Protection will be provided for the child and the person subject to the allegation will be supported.

We will always ensure that the procedures outlined in the local authority arrangements for managing allegations and Part 4 of '*Keeping Children Safe in Education*', DfE are adhered to and where appropriate, we will seek advice from the LADO.

Allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in school would apply when staff (including volunteers and supply staff) have (or alleged to have):

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

The last bullet point includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk. Where appropriate an assessment of transferable risk to children with whom the person works will be undertaken. If in doubt we will seek advice from the LADO.



When an allegation is made against an adult that meets the above criteria it should be reported immediately to the Headteacher who is the 'case manager'.

This includes allegations made against agency and supply staff, volunteers and contractors. Should an allegation be made against the Headteacher, this should be reported to the Chair of the Governing Board or staff may report directly to the LADO using the contact details on page 5 of this document.

In the event that neither the Headteacher nor Chair of the Governing Board is contactable on that day, the information must be passed to and dealt with by either the member of staff acting as Headteacher / the DSL or the Vice Chair of the Governing Board.

The case manager will conduct basic enquiries in line with local procedures and KCSIE to establish the facts to help determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and / or children's social care will be convened.

Cases of suspected abuse will be referred to children's social care.

The case manager will immediately discuss with the LADO, the nature, content and context of the allegation and agree a course of action. Where the case manager deems there to be an immediate risk to children or a criminal offence has been committed, the police will be contacted immediately. All discussions, agreed actions and communications will be recorded in writing using the Cause for Concern form. The LADO should be informed within one day of any allegations made to the case manager and any actions taken.

If the initial discussion leads to no further action, the case manager and the LADO will record the decision and justification for it and agree on what information should be put in writing to the individual concerned.

The case manager will ensure that the individual who is subject to the allegation is informed as soon as possible explaining the likely course of action guided by the LADO, and the police where necessary. The case manager will appoint a named representative to keep the person informed about the progress of the case and consider any appropriate support.

The case manager will ensure that parents of the child or children involved are formally told about the allegation as soon as possible and kept informed of the progress of the case, only in relation to their child. They will be made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

The case manager will monitor the progress of the case to ensure that it is dealt with as quickly as possible in a thorough and fair process.

The case manager will carefully consider whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It will be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious it might be grounds for dismissal. The case manager will seek views from HR and the LADO, as well as the police and children's social care where they have been involved. Where an individual is suspended, they will be provided with a named contact in school.

The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service (DBS) and/or the Teaching Regulation Agency (TRA) should be made where an allegation is substantiated and the person is dismissed or the school ceases to use their services, or resigns or otherwise ceases to provide their services.

The school has a legal obligation to make a referral to the DBS for consideration of whether inclusion on the barred lists is required; where it considers an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person poses a risk to a child.

In the case of a member of teaching staff, the case manager must consider making a referral to the TRA to consider prohibiting the individual from teaching.

If an allegation is made against a supply teacher, agency worker or contractor, the headteacher will liaise closely with the agency involved. The Headteacher will ensure that any allegations are dealt with following the school's procedures and in liaison with the LADO.

If an allegation is made against a governor, the Headteacher will follow local authority arrangements for managing allegations, liaising with the LADO.

Details of allegations following an investigation that are found to have been malicious or false will be removed from personnel records, unless the individual gives their consent for retention of the information. For all other allegations, a written record of details of the investigation and the outcome will be retained in the individual's personnel file in line with KCSIE and a copy provided to the individual.

In cases where allegations are proven to be unsubstantiated, unfounded, false or malicious the LADO and case manager will consider whether the person who made the allegation is in need of help or may have been abused by someone else and this is a cry for help. A referral to children's social services may be deemed appropriate.

Allegations proven to be unsubstantiated, unfounded, false or malicious will not be included in employer references.

If an allegation is shown to be deliberately invented or malicious, the Headteacher will consider whether disciplinary action should be taken against a child, or whether the police should be asked to consider action against an adult.

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

On conclusion of a case in which the allegation is substantiated, the case manager and the LADO will review the case to determine whether there are any improvements to be made to the school's procedures or practices to help prevent similar events in the future.

Allegations against a teacher who is no longer teaching should be referred to the police. Non recent allegations of abuse should be reported to the LADO who will liaise with other agencies. Abuse can be reported no matter how long ago it happened.

## **Low-level concerns**

All concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) will be dealt with promptly and appropriately.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the criteria indicated in the allegations section above.

A low-level concern is any concern, no matter how small, and even if no more than causing a sense of unease or a nagging doubt.

An adult working in or on behalf of the school may have acted in a way that does not meet the expectation in the Staff Code of Conduct, including conduct outside of school and does not meet the allegations criteria or is not considered serious enough to refer to the LADO.

Such behaviour can exist on a wide spectrum; examples could include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Using inappropriate language

Low-level concerns about a member of staff should be reported immediately to the DSL/Headteacher. Where the concern is about the DSL it should be reported to the Headteacher and where it is about the Headteacher it should be reported to the Chair of the Governing Board or directly to the LADO using the contact details given on page 5 of this policy.

Low-level concerns about a supply teacher or contractor should be reported as above. The DSL/Headteacher will notify the employer so that any patterns of inappropriate behaviour can be identified.

All low-level concerns will be recorded by the DSL/Headteacher using the Cause for Concern form which should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible. The form will be stored securely and confidentially.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies will be revised or extra training delivered to minimise the risk of it happening again.

If the concern has been raised via a third party, the Head Teacher will collect as much evidence as possible by speaking directly to the person who raised the concern, unless it has been raised anonymously and to the individual involved and any witnesses

Full details of how to deal with low-level concerns are contained within the Managing low-level concerns policy, which may be found in Appendix P

## SAFER WORKING PRACTICE

All staff have a responsibility to maintain public confidence in their ability to safeguard the welfare and best interests of children. They should adopt high standards of personal conduct in order to maintain confidence and respect of the general public and those with whom they work.

All staff will be provided with a copy of our school's Staff Code of Conduct, Online Safety Policy and the Acceptable Use Agreement at induction which sets out the school's expectations of staff behaviour. We will review our Code of Conduct regularly and ask staff to ensure that they are familiar with the current version. Staff are expected to carry out their duties in accordance with the Code of Conduct.

There will be occasions when some form of physical contact is inevitable, for example if a child has an accident or is hurt or is in a situation of danger to themselves or others around them. However, at all times the agreed policy for positive handling must be adhered to.

If staff, visitors, volunteers or parent helpers are working with children alone they must ensure they are visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions.

Further advice can be found in 'Guidance for Safer Working Practices for Adults who Work with Children and Young People in Education Settings' (2019 with an addendum 2020). All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

## SAFER RECRUITMENT

We will ensure that the headteacher and at least one member of the Governing Board have completed appropriate safer recruitment training. At all times the headteacher and Governing Board will ensure that safer recruitment practices are followed in accordance with the requirements of '*Keeping Children Safe in Education*', DfE

The school will follow the Recruitment and Selection Procedures when making decisions about the suitability of prospective employees. This will include: conducting the relevant checks, obtaining appropriate references and information from interviews.

Where staff work in EYFS or wraparound care for children under the age of 8, we will ensure the appropriate checks are carried out to ensure that individuals are not disqualified under the Children Disqualification Regulations 2018.

We will maintain a Single Central Record of all safer recruitment checks carried out in line with statutory requirements.

We will continue to be vigilant in school and encourage staff to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children.

**Visitors**

The school has clear protocols for visitors to ensure they are suitable and supervised as appropriate.

Visitors will be expected to understand that the school promotes British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and that they will need to uphold these during their visit.

For some visits, the school will request a copy of the material to be used to assess its content and relevance to the age group.

If during the visit the supervising member of staff deems the content to be inappropriate they will stop the visitor and discuss an alternative approach.

During the visit, visitors will be supervised by a member of school staff. Where the visitor will be working on a one-to-one basis with a child, specific safeguarding arrangements will be put in place.

## MANAGING SAFEGUARDING

### The Governing Board

The Governing Board is accountable for ensuring the effectiveness of this policy and our compliance with it. Although our Governing Board takes collective responsibility to safeguard and promote the welfare of our pupils, we also have a named Governor who champions safeguarding within the school.

The Governing Board will ensure that:

- The safeguarding policy is in place and is reviewed annually, is available publicly via our school website and has been written in line with Local Authority guidance and the requirements of the Local Safeguarding Partners' policies and procedures.
- The school contributes to inter-agency working in line with Working Together to Safeguard Children (2018).
- A senior member of staff from the leadership team is designated to take the lead responsibility for safeguarding and child protection and that there is a deputy DSL(s) who is appropriately trained to deal with any issues in the absence of the DSL. There will always be cover for this role.
- All staff receive a safeguarding induction and are provided with a copy of this policy and the staff code of conduct.
- All staff undertake appropriate child protection training that is updated regularly, at least annually.
- Procedures are in place for dealing with allegations against members of staff, volunteer and contractors, in line with statutory guidance.
- Safer recruitment practices are followed in accordance with the requirements of *'Keeping Children Safe in Education'* DfE.
- Governors remedy without delay any weakness in regard to our safeguarding arrangements that are brought to their attention.
- Appropriate arrangements are in place to keep children safe when organisations or individuals rent or hire school facilities/premises. Safeguarding requirements will be included in any hire or lease agreement as a condition of use of the premises.

The Governing Board will receive an annual safeguarding report that will detail the training that has taken place and will inform the Governing Board how the school meets its statutory requirements.

The Governing Board will undertake a range of safeguarding visits over the year to monitor safeguarding compliance.

### The Headteacher is responsible for:

- Identifying a senior member of staff from the leadership team to be the Designated Safeguarding Lead (DSL).
- Identifying members of staff to act as the DSL in his/her absence to ensure there is always cover for the role.
- Ensuring that the policies and procedures adopted by the Governing Board, particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice and such concerns are addressed sensitively in accordance with agreed whistle-blowing procedures.

- Liaise with the Local Authority Designated Officer (LADO) in the event of an allegation of abuse being made against a member of staff.

### **The designated safeguarding lead (DSL)**

The DSL is a senior member of staff, from the leadership team who takes lead responsibility for online safety, safeguarding and child protection within our school. The DSL will carry out their role in accordance with the responsibilities outlined in Annex C of '*Keeping Children Safe in Education*' DfE.

The DSL will provide advice and support to other staff on child welfare and child protection matters. Any concern for a child's safety or welfare will be recorded in writing and given to the DSL.

During term time the DSL and / or a deputy will always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. If in *exceptional* circumstances, a DSL is not available on the school site in person, we will ensure that they are available via telephone and any other relevant media.

The DSL will manage referrals and will refer cases of suspected abuse to children's social care and refer cases to the Channel programme if there is a radicalisation concern.

The DSL will liaise with the three safeguarding partners and other agencies where necessary. Through regular training, knowledge and experience the DSL will be equipped to attend and contribute to child protection case conferences, strategy discussions and other interagency meetings.

The DSL will maintain detailed, accurate written records and child protection files ensuring that they are kept confidential and stored securely.

When children leave school, the DSL will ensure child protection records are transferred separately from the main pupil file, ensuring secure transit and a confirmation of receipt will be obtained.

The DSL is responsible for ensuring that all staff members and volunteers are aware of the school's safeguarding policy and the procedures they need to follow. They will ensure that all staff, volunteers and regular visitors have received appropriate child protection training during induction.

The DSL will help promote educational outcomes by sharing information about the issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff.

### **Opportunities to teach safeguarding**

We will teach children how to keep themselves safe.

All children are explicitly taught how to use internet-enabled devices safely in Computing and PSHE lessons, but also when using devices to support learning in other subjects. This is always couched in an age-appropriate manner using terminology which is relevant and understandable. Engaging resources are used to get key messages across and the THINK and SMART acronyms are used across school to support this approach. In Upper Key Stage 2, discussions around privacy on the internet extend to sharing private information and

images. Although nudes and semi-nudes are not directly referred to, children are educated on safe and consensual image sharing alongside the dangers of the internet when images or information have been shared.

As part of our broad and balanced curriculum, children are taught about many safeguarding concerns. This involves planned lessons, visits off-site, visitors in school, themed weeks/days and assemblies. Due to the nature of our site, children are regularly educated about 'stranger danger', safe use of roads and crossings. School has been actively engaged in Operation Encompass sessions, attended Safety Works, run First Aid courses for children and held cycling proficiency training on site.

Relationships and Sex Education is an embedded part of the PSHE curriculum. Using age-appropriate materials, children are taught about different types of relationships, healthy relationships, consent, forced marriage and privacy. This is supported by the Coram Life SCARF PSHE programme and there is a school-wide approach to reminding children about privacy using the NSPCC's Pantosaurus resources. The topic of sharing nudes and semi-nudes is part of the RSE curriculum and covered during lessons on privacy and consent in Upper Key Stage 2.

Children are taught about conflict resolution, assertiveness, respect and negotiation from an early age using role play, discussion and other appropriate teaching tools. There are regular reminders for children to report anything which concerns them to a trusted adult. Worry monsters and confidential boxes are available in each form room for children to share concerns or report incidents.

The curriculum coverage is shared with parents annually and a parental consultation took place in 2021 regarding the Relationships and Sex Education curriculum.



## TRAINING AND INDUCTION

**All** new members of staff or volunteers will be informed of safeguarding procedures, including the recording and reporting procedures as part of the induction process. They will receive safeguarding training within the first half term of joining the school. This programme will include information relating to signs and symptoms of abuse, how to manage a disclosure from a child, how to record concerns and the role of the Designated Safeguarding Lead (DSL). The training will also include information about whistle-blowing in respect of concerns about another adult's behaviour and suitability to work with children. All staff will receive online safety training.

In addition to the safeguarding induction, we will ensure that mechanisms are in place to assist staff to understand and discharge their role and responsibilities as set out in Part one of *'Keeping Children Safe in Education'* DfE.

In order to achieve this, we will ensure that:

- All members of staff will undertake appropriate safeguarding training on an annual basis, including online safety.
- We will evaluate the impact of this training.
- All members of staff receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings), as required, but at least annually, to provide them with the relevant skills and knowledge to safeguard children effectively.

All regular visitors, temporary staff and volunteers to our school will be given a set of our safeguarding procedures; they will be informed of who the DSL and deputies are and what the recording and reporting system is. (See Appendix A).

The DSL, deputies and any other senior member of staff who may be in a position of making referrals or attending child protection conferences or core groups will attend appropriate training at least every two years in line with local requirements. This will include local inter-agency working protocols and training in the safeguarding partners' approach to *Prevent* duties. In addition to formal training, the DSL will ensure that they update their knowledge and skills at regular intervals, but at least annually, to keep up with any developments relevant to their role.

The Governing Board will also undertake appropriate training to ensure they are able to carry out their duty to safeguard children.

We actively encourage all of our staff to keep up to date with the most recent local and national safeguarding advice and guidance, Annex B of *'Keeping Children Safe in Education'* provides links to guidance on specific safeguarding issues. In addition, throughout the school year we will brief staff on key issues identified by the school.

All staff are expected to read these key documents and fully **understand** their responsibility to keep children safe:

- Part One and Annex A and B of *'Keeping Children Safe in Education'* DfE
- Safeguarding and Child Protection Policy
- Managing Low-Level Concerns Policy
- Behaviour Policy
- Staff Code of Conduct
- Acceptable Use Policy
- Use of Mobile Telephones in EYFS Policy

- Whistleblowing Policy
- Safeguarding responses to children who go missing from education
- Role of the Designated Safeguarding Lead (including the identity of the DSL and any deputies)

## WORKING WITH PARENTS AND CARERS

The school is committed to working in partnership with parents/carers to safeguard and promote the welfare of children and to support them to understand our statutory responsibilities in this area.

When new pupils join our school, parents and carers will be informed that we have a safeguarding policy. A copy will be provided to parents on request and is available on the school website. Parents and carers will be informed of our legal duty to assist our colleagues in other agencies with child protection enquiries and what happens should we have cause to make a referral to children's social care.

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission or it is necessary to do so in order to safeguard a child from harm.

We will seek to share with parents any concerns we may have about their child *unless* to do so may place a child at increased risk of harm. A lack of parental engagement or agreement regarding the concerns the school has about a child will not prevent the DSL making a referral to children's social care in those circumstances where it is appropriate to do so.

In order to keep children safe and provide appropriate care for them, the school requires parents to provide accurate and up to date information regarding:

- Full names and contact details of all adults with whom the child normally lives
- Full names and contact details of all persons with parental responsibility (if different from above)
- Emergency contact details (if different from above); wherever possible school will hold more than one emergency contact for each child
- Full details of any other adult authorised by the parent to collect the child from school (if different from the above)

The school will retain this information on the children's file. The school will only share information about children with adults who have parental responsibility for a child or where a parent has given permission and the school has been supplied with the adult's full details in writing.

If in any doubt about information sharing, staff should speak to the DSL (or deputy). 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.

## RELEVANT POLICIES

To underpin the values and ethos of our school and our intent to ensure that pupils at our school are appropriately safeguarded the following policies are also included under our safeguarding umbrella:

- Staff Code of Conduct
- Anti-Bullying Policy
- Behaviour Policy
- Recruitment Policy
- Whistleblowing Policy
- Managing Low-Level Concerns Policy
- Confidentiality Policy
- Data Protection Policy
- Governing Body Code of Conduct
- Health and Safety Policy
- First Aid Policy
- Record Keeping Policy
- Acceptable Use Policy – including remote teaching and learning
- Use of mobile Telephones in EYFS Policy
- Online Safety Policy
- Equal Opportunities Policy
- Volunteer Policy
- Photography in School Policy
- Educational Visits Policy
- Staff Handbook
- Relationships Education Policy
- GDPR Procedures



## Appendix A: Safeguarding Induction Sheet (For new or supply staff, visitors and volunteers)

We all have a statutory duty to safeguard and promote the welfare of children, and at our school we take this responsibility seriously.

If you have any concerns about a child or young person in our school, you must share this information immediately with our Designated Safeguarding Lead (DSL) or deputy.

Do not think that your worry is insignificant if it is about hygiene, appearance or behaviour – we would rather you told us as we would rather know about something that appears small than miss a worrying situation.

**If you think the matter is very serious and may be related to child protection, for example, physical, emotional, sexual abuse or neglect, you must find one of the designated professionals detailed below and provide them with a written record of your concern.**

**A copy of the form to complete is attached to this and others can be obtained from the Staff Information Section within Teams, the staff room or front office. Please ensure you complete all sections as described.**

**If you are unable to locate one of the designated professionals, ask a member of the school office staff to find them and to ask them to speak with you immediately about a confidential and urgent matter.**

Any allegation concerning a member of staff, a child's Foster Carer or a volunteer should be reported immediately to the headteacher. If an allegation is made about the Headteacher, you should pass this information to the Chair of the Governing Board. Alternatively, you can contact the Local Authority Designated Officer on Tel: 0191 2774636. The [NSPCC whistleblowing helpline](https://www.nspcc.org.uk/keeping-children-safe/what-to-do/whistleblowing/) is also available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00am to 8:00pm, Monday to Friday or via e-mail: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### The people you should talk to in school are:

Designated Safeguarding Lead- including EYFS (DSL):	Fiona Coleman
Location of office:	Main School Building, Room 12
Contact Number:	Extn 202
Deputy DSL:	Gemma Strong
Location of office:	Main School Building, Room 116
Contact Number:	Extn 218
Chair of Governing Board	Susan Blair
Contact Number:	07739 822625

*At Newcastle Preparatory School we strive to safeguard and promote the welfare of all of our children.*

## Appendix B: ABUSE AND NEGLECT

### Indicators of abuse and neglect

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting; by those known to them, or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings. (See peer on peer abuse)

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

**Sexual Abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Emotional Abuse** is the persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development.

It may involve conveying to children that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

We recognise that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges and these are discussed in staff training. These additional barriers can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Children with SEN and disabilities can be disproportionately impacted by things like bullying - without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

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

- Provide adequate food and clothing, 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 caretakers)
- Ensure access to appropriate medical care or treatment

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

## SPECIFIC SAFEGUARDING ISSUES

### Appendix C: Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)

We know that different forms of harm often overlap and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status and access to economic or other resources.

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- Appear with unexplained gifts, money or new possessions
- Associate with other children involved in exploitation
- Suffer from changes in emotional well-being
- Misuse drugs and alcohol
- Go missing for periods of time or regularly come home late
- Regularly miss school or education or do not take part in education

Children who have been exploited will need additional support to help maintain them in education.

#### Child Criminal Exploitation (CCE)

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

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

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



## Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

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

It can involve force and/or enticement based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

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

The following list of indicators is not exhaustive or definitive but it does highlight common signs which can assist professionals in identifying children or young people who may be victims of sexual exploitation.

Signs include:

- Underage sexual activity
- Inappropriate sexual or sexualised behaviour
- Sexually risky behaviour, e.g. 'swapping' sex
- Repeated sexually transmitted infections
- In girls, repeated pregnancy, abortions, miscarriage
- Having multiple mobile phones and worrying about losing contact via mobile phone
- Having unaffordable new things (clothes, mobile phone) or expensive habits (alcohol, drugs)
- Changes in the way they dress
- Going to hotels or other unusual locations to meet friends
- Seen at known places of concern
- Moving around the country, appearing in new towns or cities, not knowing where they are
- Getting in/out of different cars driven by unknown adults
- Having older boyfriends or girlfriends
- Contact with known perpetrators
- Involved in abusive relationships, intimidated and fearful of certain people or situations
- Hanging out with groups of older people, or anti-social groups, or with other vulnerable peers
- Recruiting other young people into exploitative situations
- Unexplained changes in behaviour or personality (chaotic, aggressive, sexual, mood swings, volatile behavior and / or emotional distress)
- Self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders
- Getting involved in crime / police involvement, police records
- Involved in gangs, gang fights, gang membership
- Injuries from physical assault, physical restraint and/or sexual assault

## County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs 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. Children and vulnerable adults are exploited to move, store and sell 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 a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes.

Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children:

- Persistently going missing from home or school and subsequently found in areas away from their home
- In excessive receipt of calls and text messages
- In relationships with older, controlling individuals
- Associated with gangs
- Under suspicion of self-harm, physical assault or unexplained injuries
- With parental concerns
- Showing a significant decline in school performance
- Demonstrating significant changes in emotional wellbeing
- 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

## SERIOUS VIOLENCE

All staff should be aware of the indicators, which may signal 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
- Signs of assault or unexplained injuries

Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see Appendix C).

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- 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

## Appendix D: So-called 'honour'-based abuse

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including:

- Female Genital Mutilation
- Forced Marriage
- Breast Ironing

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the Designated Safeguarding Lead (or deputy). Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Female Genital Mutilation (FGM)

#### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

4 types of procedure:

Type 1	Type 2	Type 3	Type 4
Clitoridectomy:  Partial/total removal of clitoris	Excision:  Partial/total removal of clitoris and labia minora	Infibulation:  Entrance to vagina is narrowed by repositioning the inner/outer labia	All other procedures that may include: pricking, piercing, incising, cauterising and scraping the genital area

#### Why is it carried out?

Belief that FGM:

- Brings status/respect to the girl – social acceptance for marriage
- Preserves a girl's virginity
- Is part of being a woman / rite of passage
- Upholds the family honour
- Cleanses and purifies the girl
- Gives a sense of belonging to the community
- Fulfils a religious requirement
- Perpetuates a custom/tradition
- Helps girls be clean / hygienic
- Is cosmetically desirable
- Mistakenly believed to make childbirth easier

FGM is internationally recognised as a violation of human rights of girls and women. It is **illegal** in most countries, including the UK.

### **Circumstances and occurrences that may point to FGM happening**

- Child talking about getting ready for a special ceremony
- Family taking a long trip abroad
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghanistan, Kurdistan, Indonesia and Pakistan)
- Knowledge that the child's sibling has undergone FGM
- Child talks about going abroad to be 'cut' or to prepare for marriage

### **Signs that may indicate a child has undergone FGM:**

- Prolonged absence from school and other activities
- Behaviour change on return from a holiday abroad, such as being withdrawn and appearing subdued
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable
- Complaining about pain between the legs
- Mentioning something that somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group
- Reluctance to take part in physical activity
- Repeated urinary tract infections
- Disclosure

## **Forced Marriage**

Forcing a person into marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into the marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

Signs and symptoms may include:

- Students may appear anxious, depressed and emotionally withdrawn with low self-esteem.
- They may have mental health disorders and display behaviours such as self-harming, self-cutting or anorexia.
- Sometimes they may come to the attention of the police having been discovered shoplifting or taking drugs or alcohol.
- Often students' symptoms can be exacerbated in the periods leading up to the holiday season.
- Students may present with a sudden decline in their performance, aspirations or motivation.
- They may be subject to excessive restrictions and control at home.
- Some students may not be allowed to attend any extra-curricular or after-school activities.
- Girls and young women may be accompanied to and from school/college, and even during lunch breaks.
- Some students may stop attending school or college.
- Their homework is incomplete or appears rushed. This may be the result of being actively discouraged from doing it by family members.

- Students may do their homework late at night, which frequently shows in school because they are lethargic, unable to concentrate and have a general appearance of tiredness.
- Professionals being told that the student is out of the country.
- There are occasions when older siblings (usually brothers) and cousins keep a close eye on girls to make sure that they do not meet anyone or talk to friends.
- Conflict between the student and their parents about whether the student will be allowed to continue their education.
- Family history of older siblings leaving education early and marrying early.

## Appendix E: Preventing Radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- **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.
- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's DSL (and any deputies) should be aware of local procedures for making a Prevent referral.

### The Prevent Duty

All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

### School Leaders must:

- Familiarise themselves with the revised Prevent duty guidance: for England and Wales
- Take part in Prevent training and ensure staff have the relevant training
- Assess local risk of extremism
- Ensure there are robust IT protocols to filter out extremist materials
- Ensure school buildings are not be used to give a platform to extremists

### Channel

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 or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

### **Understanding and recognising risks and vulnerabilities of radicalisation**

Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm.

Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Possible indicators include:

- Use of inappropriate language
- Possession of violent extremist literature
- Behavioural changes
- Advocating violent actions including:
  - Association with known extremists
  - Seeking to recruit others to an extremist ideology



## Appendix F: Private Fostering

Many people find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more it is private fostering.

The Children Act 1989 defines a relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.

People become involved in private fostering for all kinds of reasons. Examples of private fostering include:

- Children who need alternative care because of parental illness
- Children whose parents cannot care for them because their work or study involves long or antisocial hours
- Children sent from abroad to stay with another family, usually to improve their educational opportunities
- Unaccompanied asylum-seeking and refugee children
- Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents
- Children staying with families while attending a school away from their home area

There is a mandatory duty on the school to inform children's social care of a Private Fostering Arrangement. Children's social care has a duty to check that the young person is being properly cared for and that the arrangement is satisfactory.

### Further information:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/274414/Children\\_Act\\_1989\\_private\\_fostering.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf)

## Appendix G: Children missing from education

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage.

Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures.

Further information can be found in 'Children Missing Education' statutory guidance for local authorities – September 2016.

## Appendix H: Sexual violence and harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that all victims 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.

Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

All staff have been made 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
- Not tolerating or dismissing sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys"
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts
- Dismissing or tolerating such behaviours risks normalising them

### Sexualised behaviour

Green Behaviours...	Amber Behaviours...	Red Behaviours...
<p>are part of safe and healthy sexual development which are:</p> <ul style="list-style-type: none"> <li>• displayed between children or young people of similar age or developmental ability</li> <li>• reflect curiosity, experimentation, consensual activities and positive choices</li> <li>• 'normal' but inappropriate within the school/classroom setting</li> </ul>	<p>are potentially outside of safe and healthy development due to:</p> <ul style="list-style-type: none"> <li>• age or developmental differences</li> <li>• activity type, frequency, duration or context</li> </ul>	<p>are clearly outside of safe and healthy development and:</p> <ul style="list-style-type: none"> <li>• involve much more coerciveness, secrecy, compulsiveness &amp; threat</li> <li>• require action from school &amp; other agencies</li> </ul>

For further information of sexualised behaviour thresholds visit [Harmful sexual behaviour framework: an evidence-informed operational framework for children and young people displaying harmful sexual behaviours \(nspcc.org.uk\)](https://www.nspcc.org.uk/keeping-children-safe/sexual-behaviour-framework/)

## **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**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. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

## **What is consent?**

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice. Further information about consent can be found here: Rape Crisis England & Wales - Sexual consent

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape

## **Sexual harassment**

When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school/college. 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
- 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. It may include:
  - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos.
  - sharing of unwanted explicit content
  - upskirting (is a criminal offence)
  - sexualised online bullying
  - unwanted sexual comments and messages, including, on social media
  - sexual exploitation; coercion and threats

## **Upskirting**

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

## Appendix I: Modern slavery and Trafficking

### Modern Slavery

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM (National Referral Mechanism) is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### Human Trafficking

Human trafficking is 'the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, abduction, fraud, deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other forms of sexual exploitation, forced labour or services, slavery or practices similar to slavery, servitude or the removal of organs'.

### Child trafficking

"Child" shall mean any person under eighteen years of age. Any child transported for exploitative reasons is considered to be a trafficking victim, whether or not they have been forced or deceived. This is partly because it is **not considered possible for children to give informed consent**. Even when a child understands what has happened, they may still appear to submit willingly to what they believe to be the will of their parents or accompanying adults. It is important that these children are protected too.

Children are trafficked for many reasons, including sexual exploitation, domestic servitude, labour, benefit fraud and involvement in criminal activity such as pick-pocketing, theft and working in cannabis farms. There are a number of cases of minors being exploited in the sex industry. Although there is no evidence of other forms of exploitation such as 'organ donation or 'harvesting', all agencies should remain vigilant.

Children may be trafficked from other countries for a variety of reasons. There are a number of factors in the country of origin which might make children vulnerable to being trafficked.

The factors listed below are by no means a comprehensive list:

- Poverty
- Lack of education
- Discrimination
- Cultural attitudes
- Grooming
- Dysfunctional families
- Political conflict and economic transition and
- Inadequate local laws and regulations

### **Potential indicators that a child may have been trafficked**

Once in the UK the child:

- Receives unexplained/unidentified phone calls whilst in placement/temporary accommodation
- Shows signs of physical or sexual abuse, and/or has contracted a sexually transmitted infection or has an unwanted pregnancy
- Has a history with missing links and unexplained moves
- Has gone missing from Local Authority care
- Is required to earn a minimum amount of money every day
- Works in various locations
- Has limited freedom of movement
- Appears to be missing for periods
- Is known to beg for money
- Performs excessive housework chores and rarely leaves the residence
- Is being cared for by adult/s who are not their parents and the quality of the relationship between the child and their adult carers is not good; is one among a number of unrelated children found at one address
- Has not been registered with or attended a GP practice
- Has not been enrolled in school
- Has to pay off an exorbitant debt, e.g. for travel costs, before having control over own earnings, is permanently deprived of a large part of their earnings by another person
- Is excessively afraid of being deported

### **Further information:**

[www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance](http://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance)

## Appendix J: Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. (KCSIE)

The cross-government definition of domestic abuse is:

Any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- Psychological
- Physical
- Sexual
- Financial
- Emotional

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

Young people can also experience domestic abuse within their own intimate relationships. This form of peer on peer abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16).

### **Signs, indicators and effects:**

It is often difficult to tell if domestic abuse is happening because it takes place in the family home and abusers can act very differently when other people are around. Children who witness domestic abuse may show signs of:

- Aggression and bullying
- Anti-social behaviour
- Depression, anxiety or have suicidal thoughts
- Attention seeking
- Bed wetting, nightmares or insomnia
- Drug and alcohol misuse
- Constant or regular sickness, such as colds and headaches
- Eating disorders
- Not doing as well in school – due to difficulties at home or disruption of moving to, as well as from, refuges
- Withdrawal

### **Other signs and symptoms may include:**

- Sudden change of behaviour
- Clingy
- Soiling clothes
- Risk taking behaviours



- Missing school
- Changes in eating habits
- Obsessive behaviour
- Self-harm

Source: [www.nspcc.org.uk](http://www.nspcc.org.uk)

Some children may not display any symptoms / behaviours that may be a cause for concern. 'What is life like at home?' – is a good question to use regularly with all children.

### **We are an 'Operation Encompass' school**

Operation Encompass operates in all 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 should inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs.

## Appendix K: Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity.

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. (KCSIE)

Types of homelessness could include:

- Living in temporary or emergency accommodation (such as B & Bs and hostels)
- Hidden homelessness (staying with friends or family on a temporary basis or living in overcrowded conditions)
- Couch / sofa surfing, moving from one place to another

Impact of homelessness:

- Practical issues include loss of possessions required for school e.g. books, uniform etc
- May be unkempt due to lack of laundry services
- Physically exhausted due to sleeping arrangements
- Emotionally exhausted due to increased stress
- Signs of severe emotional trauma leading to emotional stress, anxiety
- Changes in behaviour and/or problematic behaviour
- Child may become withdrawn or aggressive
- If placed out of area they may arrive late or miss school due to transport / financial difficulties
- The child's ability to maintain relationships may be affected
- May 'stand out' more to peers, leading to feelings of alienation and self-consciousness
- Impact on attainment levels and ability to learn (Shelter 2017)

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. (KCSIE)

## Appendix L: Mental Health Concerns

At NPS we recognise the link between pupil mental health, vulnerability and potential safeguarding concerns. We fully understand that schools have an important role to play in supporting the mental health and wellbeing of their pupils.

All schools are under a statutory duty to promote the welfare of their pupils, which includes preventing impairment of children's health or development, and taking action to enable all children to have the best outcomes.

**KCSIE 2021** states that all staff at NPS 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.

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

We will ensure that our staff understand the support they can provide to pupils who may be experiencing mental health issues, and we will ensure that staff follow the following principles as set out in **Mental Health and Behaviour in Schools 2018**.

We recognise that early intervention to identify issues and provide effective support is crucial. The school role in supporting and promoting mental health and wellbeing can be summarised as:

**Prevention:** we will seek to create a safe and calm environment where mental health issues are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental health and wellbeing through the curriculum and reinforcing this teaching through school activities, culture and ethos;

**Identification:** we will support staff and pupils to recognise emerging issues as early and accurately as possible;

**Early support:** we will support and help pupils to access evidence based early support and interventions where ever possible and seek access to specialist support for those pupils who require such interventions.

We aim to work in partnership with pupils, parents / carers and establish effective relationships with external agencies to provide swift access or referrals to specialist support and treatment.

## Appendix M: Example Cause for Concern form

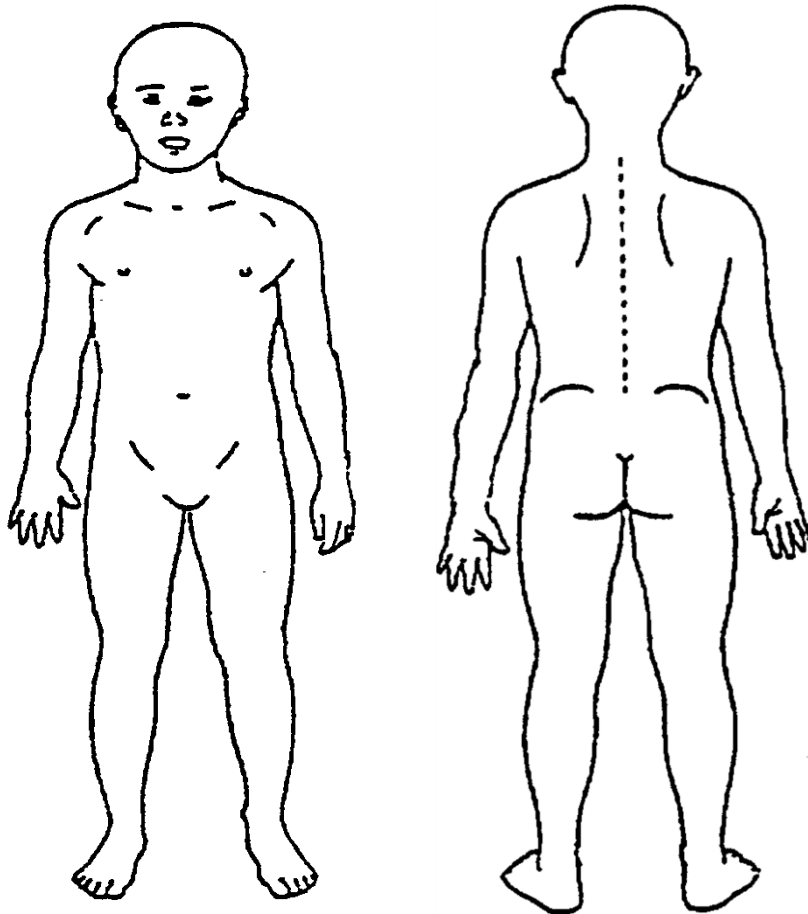


<b>Full Name of Child:</b>		<b>DOB:</b>
<b>Time of concern:</b>	<b>Date of concern:</b>	<b>Place of concern:</b>
<b>Concern:</b>		
<b>Detailed Account:</b> <p>(Please bullet point. Do not interpret what is seen or heard; simply record the facts. After completing the form, pass it immediately to the Designated Safeguarding Lead / Deputy)</p>		
<b>Member of Staff completing form</b>		<b>Role / Title</b>

Please provide a copy to the Designated Safeguarding Lead

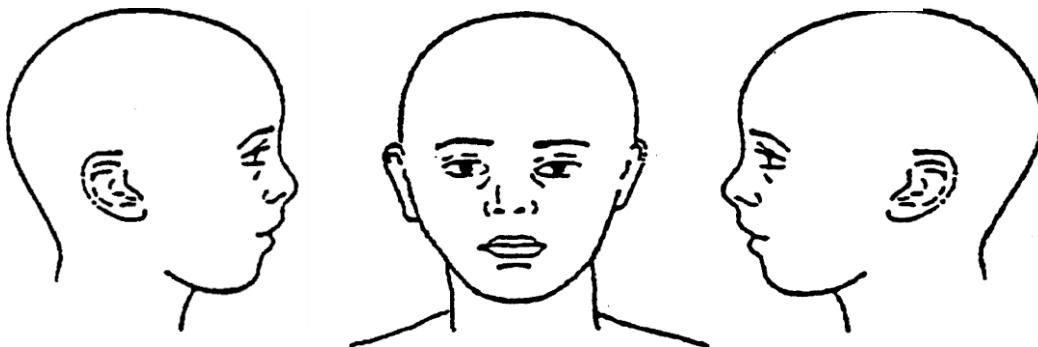
## Appendix N: Body Map

Child's Full Name	DOB	Date



Electronic Version:

Click and move the red dot to indicate where the injury is located on the



Description of injury / additional notes:		
Professional's Name	Professional's Designation	Contact Number

## Appendix O: Designated Safeguarding Lead Check List

Possible Action	By Whom	Outcome
Discuss with child		
Contact parents		
Check records in school		
Discuss with relevant professionals		
Check with schools who have siblings		
Seek advice from LA		
Monitor and review		
Consider an Early Help Plan (previously CAF)		
Consult with Social Care		
Contact Police 101: Non emergency 999: Immediate Danger		
Other (please specify)		
<b>Assessment of Risk</b>		
Safeguarding	Risk of Harm	Immediate Danger

## Appendix P: Managing low-level concerns



### **Managing low-level concerns in relation to staff conduct**

Use in line with local authority guidance and Local Safeguarding Children Partnership (LSCP) procedures

## Contents

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### [Allegation/concerns that do not meet the harms threshold - 'low level concerns'](#)

[7 What is a low-level concern](#)

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[9.10 Behaviours deemed to constitute a low-level concern](#)

[9.14 Behaviours which require further advice from the LADO](#)

[10 Recording a low-level concern](#)

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## Appendices

[Appendix 1](#) Staff conduct cause for concern form

Appendix 2 Record of action for low-level concern (staff conduct)

Appendix 3 Flowchart: Managing low level concerns about staff conduct



## 1 Introduction

- 1.1 The school is committed to creating and embedding a culture of openness, trust and transparency to ensure **all** concerns about adults can be shared responsibly, with the right person, and recorded and dealt with appropriately. It is extremely important that any allegations made, or concerns raised in relation to teachers, any other member of staff, (including supply staff, volunteers and contractors) is dealt with thoroughly and efficiently, maintaining the highest level of protection for the child whilst also giving support to the person who is the subject of the allegation.
- 1.2 This policy is in line with statutory guidance set-out [within Keeping Children Safe in Education September 2021 \("KCSIE 2021"\)](#) and should be used in respect of all cases where an individual working in a school (including supply staff, volunteers and contractors) is subject to an allegation or has a concern raised in relation to them.
- 1.3 It is designed to ensure that all staff, children and parents or carers are aware of the procedure for the investigation of either an allegation made, or concerns raised, in order that all complaints are dealt with consistently, and as efficiently as possible.
- 1.4 For the purposes of KCSIE 2021 and this policy, 'children' includes everyone under the age of 18, regardless of their location i.e., both inside and outside of the school.

## 2 Purpose

- 2.1 The procedure for dealing with concerns raised in relation to staff depends on the situation and circumstances surrounding the allegation/concern raised. This policy focuses on:

Allegations/concerns that do not initially meet the harms threshold – referred to for the purposes of this guidance as 'low-level concern'.
- 2.2 It is **not necessary** for staff to be able to determine in each case whether their concern is a low-level concern, if it meets the threshold for a referral, or if meets the criteria for either. Where a member of staff has **any** concern, it should be shared in line with this policy and that determination should be made by the relevant person as set out in paragraph 4.2 of this policy.
- 2.3 It is important to recognise that, in practice, the words 'allegation' and 'concern' can be and are used interchangeably by different people. The crucial point is that the conduct is reported. If the conduct does not meet

the threshold, it should be treated as a low-level concern and this policy should be followed.

- 2.4 An allegation against a member of staff may arise from a number of sources (e.g. a report from a child, a concern raised by another member of staff in the school or a member of the community or a complaint by a parent). It may also arise in the context of the member of staff and their life outside work or at home.
- 2.5 Where a member of staff has **any** concern about an adult, they should act on it immediately and it is a fundamental principle of this policy that no employee shall be treated any less favourably or suffer any detriment in their employment as a result of sharing information or reporting a concern under this policy.
- 2.6 This policy must be followed when dealing with concerns raised. This policy will be used alongside other relevant policies adopted by the school such as (but not limited to) the complaints policy, code of conduct, safeguarding policy and disciplinary policy.
- 2.7 This policy should also be read alongside:
- local authority policy
  - Local Safeguarding Children Partnership (LSCP) procedures
  - statutory guidance: Working Together to Safeguard Children
  - statutory guidance: Keeping Children Safe in Education (KCSIE)
  - non statutory guidance: Guidance for safer working practice for those working with children and young people in education settings
  - departmental advice: What to do if you are worried a child is being abused – Advice for Practitioners
- 2.8 Employees can request a copy of any additional policies referred to within this policy from their line manager or school office.

### **3 Data Protection**

- 3.1 When managing a concern against a member of staff or a volunteer (the data subject) the school will process personal data in accordance with its data protection policy and relevant data protection legislation. Data collected from the point at which the allegation is received is held securely and accessed by and disclosed to individuals only for the purposes of managing the case.

Governing bodies and proprietors should ensure relevant staff 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 UK 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 schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the UK GDPR. Where in doubt schools should seek independent legal advice.

## **4 Staff Reporting a Concern**

4.1 Because this is a statutory duty, it is a requirement that all members of staff in school, where they have safeguarding concerns – no matter how small, will report them in accordance with this policy.

4.2 If staff have a safeguarding concern, or they receive an allegation about another person working in the school (including supply staff, volunteers, and contracted staff) posing a risk of harm to children, then it must be referred to:

- the Headteacher or the Designated Safeguarding Lead
- where there are allegations/concerns about the Headteacher this must be referred to either:
  - *Chair of Governors*
  - Local Authority Designated Officer (LADO) or

- NSPCC Whistleblowing helpline

- 4.3 Staff need to understand that when sharing a safeguarding concern that the person who is the subject of that concern will be spoken to in order to gain their account as part of any investigation and to make appropriate records which may then need to be referred to in any subsequent disciplinary proceedings.

#### **Staff who wish to remain anonymous**

- 4.4 If the staff member who raises the concern does not wish to be named, then the school will respect that person's wishes as far as possible.
- 4.5 However, there may be circumstances where the staff member will need to be named (for example, where it is necessary in order to carry out a fair disciplinary process) and, for this reason, anonymity can never be promised to staff who share low-level concerns. In circumstances where it becomes necessary to identify an individual this should be discussed with the employee and explained to them as early as possible. Where possible, the school will try to encourage staff to consent to be named, as this will help to create a culture of openness and transparency.

#### **Initial action by person receiving or identifying an allegation/concern**

- 4.6 The person to whom an allegation is first reported should treat the matter seriously and keep an open mind.

They should not:

- Investigate or ask leading questions if seeking clarification.
- Make assumptions or offer alternative explanations.
- Promise confidentiality but should instead give assurance that the information will only be shared on a 'need to know' basis.

They should:

- Make a written record of the information (where possible in the child / adult's own words), including the time, date and place of incident/s, persons present and what was said (see Appendix 1)
- Sign and date the written record.
- Immediately report the matter in line with this policy.

- 4.7 In some cases, staff may have concerns about someone closely associated with a member of staff (e.g., partner, member of the family or other household member) who may present a risk of harm to children for whom that individual is responsible. In these circumstances, such concerns should be reported in accordance with this policy.

- 4.8 There may be occasions where a member of staff feels it is necessary to self-refer, where, for example, they have found themselves in a situation which

could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. There may also be situations where a member of staff feels it necessary to voluntarily share specific information for the purpose of transparency and openness. In these circumstances, such concerns should be reported in accordance with this policy.

- 4.9 It is recognised that staff who are concerned about the conduct of a colleague towards a child are undoubtedly placed in a very difficult situation. They may worry that they have misunderstood the situation. All staff must remember that the welfare of children is paramount and must report their concerns immediately. Support to those who are anxious about sharing information should be considered where appropriate, including offering assurance that any detrimental behaviour because of information being disclosed will not be tolerated.

#### **Supply Teachers and all contracted staff**

- 4.10 In some circumstances it may be necessary to consider an allegation against an individual not directly employed by the school, where the school's policies and procedures do not fully apply; for example, supply teachers or contracted staff provided by an employment agency or business.
- 4.11 However, in accordance with KCSIE 2021 the school will ensure allegations/concerns are dealt with properly and **under no circumstance** will a decision be made to cease using the contracted staff due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Where an allegation is made against contracted staff, the Headteacher will immediately contact both the LADO and the agency/business concerned. The school will continue to support any investigation that is required.
- 4.12 It is important that any concerns raised about agency/contracted staff are shared with their employer so that any potential patterns of inappropriate conduct can be identified.
- 4.13 For supply staff, it may be necessary to discuss with the supply agency (or agencies), whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst an investigation is carried out.
- 4.14 Whilst agencies will need to be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care, the school may need to take the lead on an investigation. This is due to the fact that agencies won't have direct access to children or other school staff, therefore may find it difficult to collate

evidence as part of an investigation. The school may also be required to liaise with the LADO in relation to the referral process.

## **5 Timescales**

- 5.1 It is important that allegations/concerns are shared in line with this policy as soon as reasonably possible, and within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a concern where these timescales have not been met for any reason.
- 5.2 It is imperative that once shared, allegations against staff are dealt with as quickly and efficiently as possible to:
- minimise the risk to the child;
  - minimise the impact on the child's academic progress;
  - ensure a fair and thorough investigation for all parties.
- 5.3 To enable this to happen, all staff, parents, and children should be aware of the procedures set out in this policy.
- 5.4 Whilst KCSIE 2021 provides target timescales, the time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the concern/allegation. The school will endeavour to follow the timescales set out in the guidance for such investigations, as long as it is consistent with a fair and thorough investigation. However, it is acknowledged that allegations of a serious and complex nature are unlikely to be resolved quickly.
- 5.5 Should it be considered necessary that an allegation requires immediate attention, but is received outside normal school hours, the individual receiving the matter should consult the children's social care emergency duty team or local police and inform the LADO as soon as possible.

## **6 Initial considerations**

- 6.1 Once a concern has been raised with the Headteacher or Designated Safeguarding Lead, the procedures for dealing with concerns/allegations will be applied with common sense and judgement. Those allegations which are determined not to meet the harm threshold initially should be considered as a 'low level concern' and this policy should be followed.
- 6.2 There may be circumstances where a concern is initially considered to not meet the harm threshold but after further investigation may then be considered to either meet the threshold or have the potential to. In these

circumstances, or if in any doubt, advice from the LADO and HR should be taken and at any point during an investigation the process followed can be enhanced and the relevant policy dealing with allegations that meet the harm threshold should be followed.

- 6.3 Where it is uncertain whether an allegation meets the criteria for a referral (i.e. meets the harm threshold) the matter will be discussed first with the LADO.
- 6.4 For the purposes of both KCSIE 2021 and this policy, the Headteacher / Safeguarding Lead, or Chair of Governors/Trustees (where the Headteacher is the subject of an allegation), are referred to as the 'Case Manager'
- 7 Allegation/concerns that do not meet the harm threshold 'low level concerns'**

- 7.1 Where a concern is raised, or an allegation has been made but does not meet the harm threshold set out in paragraph 338 of KCSIE 2021, it will be dealt with as a low-level concern as set out in this policy.

This policy follows the advice and guidance set out in KCSIE 2021, Section Two: Concerns that do not meet the harm threshold paragraphs 406-426.

It is important to understand that a concern may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the school; or as a result of vetting checks undertaken.

Information sharing and the appropriate recording and handling of concerns raised is important to ensure potential patterns of concerning behaviour can be identified as soon as possible, and appropriate action taken swiftly in order to safeguard children.

## **7.2 What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the conduct towards a child does not meet the threshold set out in paragraph 338 of KCSIE 2021. This procedure enables staff to share any concerns – no matter how small – about their own or another member of staff's behaviour with the appropriate safeguarding leads in school.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college 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 LADO.

*Para. 409 – Keeping Children Safe in Education (2021)*

KCSIE provides examples of such behaviour which could include, but are not limited to:

- being over friendly with children,
- having favourites,
- taking photographs of children on their mobile phone,
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door,
- using inappropriate sexualised, intimidating or offensive language towards or in front of a child.

## 8 Sharing a low-level concern

- 8.1 It is **not necessary** for staff to be able to determine in each case whether their concern is a low-level concern, if it meets the threshold for a referral or if it meets the criteria of either. All concerns, no matter how small, should be reported in line with Section 4 of this policy. The determination as to how the concern raised will be dealt with will be made by the Case Manager.
- 8.2 Where an allegation is received by a member of staff other than the person as set out in paragraph 4.2, they should immediately report the allegation in line with Section 4 of this policy.

## 9 Responding to a low-level concern

### Initial action by the Case Manager

- 9.1 On first becoming aware of a concern being raised the Case Manager should:
- Obtain written details (signed and dated by the person receiving)
  - Record any information about times, dates and location of incident/s and names of any potential witnesses; and
  - Record discussions about the child and/or member of staff, any decisions made, and the reasons for those decisions.
- 9.2 Once this information is available the Case Manager should consider if it is necessary to discuss the information with the LADO. It may be the case, at this



stage, that the matter is not serious enough to consider a referral to the LADO but **may merit consulting** with and seeking advice from the LADO in relation to appropriate next steps, and on a no-names basis if necessary.

9.3 Following a discussion with the LADO or where it has been deemed that a discussion with the LADO is not necessary at this stage, the Case Manager will then, (so long as the LADO/other relevant external agencies have not advised not to do so);

- Speak to the person who raised the concern (unless it has been raised anonymously)
- Speak to any potential witnesses
- Speak to the individual about whom the low-level concern has been raised against

#### **Action by the school**

9.4 Following an investigation of the concern raised, the Case Manager should then review the information and determine whether the behaviour;

- (i) is entirely consistent with their staff code of conduct and the law,
- (ii) constitutes a low-level concern,
- (iii) is not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary,
- (iv) when considered with any other low-level concerns that have previously been raised about the same individual, could now meet the threshold of an allegation and should be referred to the LADO / other relevant external agencies, or
- (v) with the additional information shows that the concern itself now meets the threshold of an allegation and should be referred to the LADO / other relevant external agencies;

9.5 Consideration should be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised, or extra training delivered to minimise the risk of it happening again.

9.6 It is important that the Case Manager makes appropriate records of;

- all internal conversations – including with the person who initially shared the low-level concern and all those discussions held as part of the investigation into the matter,
- all external conversations – for example, with the LADO/other external agencies;
- their determination (as above at paragraph 9.4);
- the rationale for their decision;
- any action taken/recommendations made.

#### **Behaviour that is determined to be entirely consistent with the school's policies**

- 9.7 The Case Manager will update the individual in question and inform them of the action taken as above.
- 9.8 In addition, the Case Manager will speak to the person who shared the low-level concern in order to provide them with feedback about how and why the behaviour is consistent with the school's policies.
- 9.9 The investigation into the situation may highlight for example that the staff code of conduct is not clear, or that training has not been satisfactory, and/or that the low-level concern process is not clear enough. In which case the Case Manager may feel it necessary to make recommendations for a review of certain policies/training materials.

#### **Behaviour which is determined to constitute a low-level concern**

- 9.10 In most cases low-level concerns by their very nature are likely to be minor. Some will not require any further action. However, others may be most appropriately dealt with by means of issuing management guidance and/or training.
- 9.11 In most cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised. This conversation will be an opportunity to address unprofessional conduct and support the individual to correct it at an early stage.
- 9.12 It is important that such conversations should include being clear with the individual as to why their conduct was deemed to be of a concern, problematic or inappropriate, what change is required in their conduct, enquiring what, if any, support they might require in order to achieve and maintain that, and being clear about the consequences if they fail to reach the required standard or repeat the conduct in question. A record of the discussion should be made (via a letter of management guidance/record of discussion), which the employee should be

asked to sign and be provided with a copy. A copy of the record will be held on the employee's personal file.

- 9.13 Where a low-level concern raises issues of more serious misconduct or poor performance the Case Manager may need to refer to the school's disciplinary and/or capability procedure. If the Case Manager considers that the school's disciplinary and/or capability procedure may be triggered, they should refer the matter back to the Headteacher (or appropriate person) and should seek HR advice in line with that policy.

#### **Behaviours which require further advice from the Local Authority Designated Officer**

- 9.14 Where it is deemed that the conduct is not serious enough to consider a referral to the LADO, but may merit consulting with and seeking advice from the LADO then action should be taken in accordance with the LADO advice.
- 9.15 Where conduct was considered alongside any low-level concerns that have previously been raised about the same individual, which could now meet the threshold of an allegation, or where following an investigation it is determined that the concern itself now meets the threshold of an allegation it should be referred to the LADO / other relevant external agencies in line with this policy and HR advice should be sought.

### **10 Recording a low-level concern**

- 10.1 All low-level concerns will be recorded in writing. The record will include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns will also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- 10.2 Records relating to low level concerns will be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 of KCSIE 2021 for more information).
- 10.3 Records will be reviewed so that potential patterns of concerning, problematic or inappropriate conduct can be identified. Where a pattern of such conduct is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harm threshold, in which case it will be referred to the LADO and further advice will be taken.

- 10.4 The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation/concern if that is longer, at which point the record will be securely destroyed. A form which could be used for the purpose of recording this information is attached as Appendix 2.

## **11 References**

- 11.1 This policy is clear that only substantiated safeguarding allegations will be provided in references. Low level concerns will not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. A low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference.
- 11.2 However, where a low-level concern (or number of concerns) has met the threshold for referral to the LADO and found to be substantiated, it will be referred to in a reference, provided that the information is factual and does not include opinions.

## Appendix 1: Staff conduct cause for concern form

<b>Concern in relation to (print):</b>		
<b>Name of person completing form (print):</b>		
<b>Time of concern:</b>	<b>Date of concern:</b>	<b>Place of concern:</b>
<b>Concern:</b>		
<b>Detailed Account:</b> <p>Please bullet point. Do not interpret what is seen or heard; simply record the facts.  After completing the form, pass it immediately to the Headteacher or if not available, the Designated Safeguarding Lead.</p>		

Signature:	Date:

**Please provide a copy to the Headteacher or the Designated Safeguarding Lead**

## Record of action of low-level concern in relation to staff conduct

<b>Name:</b>			
<b>Job Title:</b>			
<b>School/college:</b>			
<b>Date of incident/concern:</b>			
<b>Initial concern reported to:</b>			
<b>Summary of concern(s):</b>			
<ul style="list-style-type: none"> <li>Obtain written details, signed and dated by the person receiving (see reporting form)</li> <li>Record any information about times, dates and location of incident/s and names of any potential witnesses; and</li> <li>Record discussions about the child and/or member of staff.</li> </ul>			
<b>Local Authority Designated Officer Discussion (if applicable)</b>			
<b>Contact made by:</b>		<b>Date:</b>	

<b>Outcome of Discussion:</b>	<b>Meets the harm threshold</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	<b>Referral to LADO required</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
	<b>Allegation Management Meeting</b>	YES <input type="checkbox"/>	NO <input type="checkbox"/>
<b>Action Points from LADO Call (if applicable)</b>			
<b>What</b>	<b>Who</b>	<b>When</b>	
1.			
2.			
3.			

<b>Action Taken</b>	
<ul style="list-style-type: none"> <li>Record any actions taken, any decisions made, and the reasons for those actions and decisions</li> </ul>	
<b>Date internal investigation concluded:</b>	
<b>Recommendation from investigation:</b>	<b>Behaviours consistent with policy</b> - NFA <input type="checkbox"/> <b>Recorded as LLC</b> - Informal Action <input type="checkbox"/> - Formal Action Considered <input type="checkbox"/> <b>Discussion with LADO required;</b> - Due to outcome of investigation <input type="checkbox"/> - Due to frequency of concerns <input type="checkbox"/>
<b>Date of informal action</b>	
<b>Date of disciplinary hearing (if applicable)</b>	
<b>Date of appeal hearing (if applicable)</b>	



<b>Additional information</b>	
<ul style="list-style-type: none"> <li>Record any further actions required including monitoring and scheduled review meetings</li> </ul>	
<b>Important Information</b>	
<p>This form should be completed in all cases where a low-level concern has been raised against a member of staff. A copy of this form should then be kept in the Schools Low Level Concern Folder/ on the employee's personal file and a copy provided to the employee.</p> <p>Where allegations are found to have been malicious this form will be removed from personal records.</p>	
Signed by Headteacher	
Employee Signature	
Date	

## Managing low level concerns about staff conduct

<p><b>1a. Concern shared with:</b></p> <p>Headteacher (HT)</p> <p>Designated Safeguarding Lead (DSL)</p> <p>If the concern is received by another staff member, they should immediately inform HT or DSL</p>	<p><b>1b. If the concern is about the HT,</b> information should be directed to either:</p> <ul style="list-style-type: none"> <li>➤ Chair of Governors / Trustees / HR Lead</li> <li>➤ Local Authority Designated Officer (LADO)</li> <li>➤ NSPCC Whistleblowing helpline</li> </ul>
↓	
<p><b>2. HT decision</b> (within 24 hours where possible):</p> <ol style="list-style-type: none"> <li>a. Contact LADO (if harm threshold met)</li> <li>b. No action</li> <li>c. Proceed with school action</li> </ol>	<p><b>6a. Internal management</b></p> <p>HT determines any additional actions:</p> <p>e.g. Revise Code of conduct / policy / provide training</p>
↓	↓
<p><b>3. School Action</b></p> <p>The HT defines areas of investigation / interviewees and starts to investigate concern (or appoints a senior leader).</p> <p>This will include:</p> <ul style="list-style-type: none"> <li>• Interviewing and take statements from all parties concerned: person reporting concern, child(ren), other adult(s) including potential witnesses and parents.</li> <li>• Check corroborative evidence.</li> </ul> <p>Written details (report) will be presented to HT.</p> <p>These will include:</p> <ul style="list-style-type: none"> <li>• Times/dates/locations/potential witnesses</li> <li>• Discussion about concerns</li> <li>• Evidence</li> <li>• Decisions made and reasons</li> </ul>	<p><b>6b. Internal management</b></p> <p>HT relays management strategy to individual being investigated. (HT can refer to previous concerns and determine if new information warrants progression to disciplinary/capability):</p> <ol style="list-style-type: none"> <li>a. Concerns not substantiated – no further action</li> <li>b. Share concerns and changes required (warning / training)</li> <li>c. If issues of poor performance or misconduct evident, HT may refer to disciplinary /capability procedure</li> <li>d. Offer support (a, b and c)</li> </ol> <p>A record of discussion is made (letter of management guidance/record of discussion). Employee receives a signed copy and copy on personal file.</p>
↓	↓
<p><b>4. HT reviews report</b></p>	<p><b>7. HT (or appointed senior leader) feed back</b></p> <p>Designated person speaks with all other parties to inform of conclusion of process and share outcome. Support offered for parties involved.</p>
↓	↓
<p><b>5. HT determines outcome:</b></p> <ul style="list-style-type: none"> <li>• Progress to enhance level as evidence indicates it meets harm threshold and HT contacts LADO</li> <li>• Consult with LADO for advice (not serious enough for referral)</li> <li>• Manage internally</li> </ul>	<p><b>8. HT monitors as required.</b></p> <p><b>It is important for HT to record all internal and external conversations, decisions, rationale, actions and recommendations.</b></p> <p><b>(see Appendix 2)</b></p>