



## Safeguarding and Child Protection Policy and Procedure

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### Quick Reference Contacts Guide

|  | Name                    | <i>Insert contact phone number</i> |
|--|-------------------------|------------------------------------|
| Designated Safeguarding Lead                 | Maz Drew                | 01793 612727<br>Ext 667            |
| Deputy DSL                                   | Wendy Butcher           | 01793 612727 Ext <b>234</b>        |
| Deputy DSL                                   | James Woods             | 01793 612727 ext 292               |
| Deputy DSL                                   | Ali Merk                | 01793 612727 ext 296               |
| Deputy DSL                                   | Kerhys Lang             | 01793 612727 ext 667/112           |
| Deputy DSL (C6)                              | Hazel McKay             | 01793 612727 ext <b>670</b>        |
| Deputy DSL (SEN)                             | Crystal Clifford-Budden | 01793 612727 ext 237/255           |
| Head teacher                                 | Chas Drew               | 01793 612727 ext 225               |
| Designated Teacher for Children Looked After | Ali Merk                | 01793 612727<br>Ext 296            |
| Young Carers Lead                            | Lucy Whetman            | Ext 102                            |

|                           |                     |
|---------------------------|---------------------|
| Early Help/ CAF Team /Hub | <b>01793 466479</b> |
|---------------------------|---------------------|

|   |  |
|---|--|
| Children's Social Care                        | 01793 466903                                     |
| Emergency Duty Service                        | 01793 436699 / 999                               |
| Adult's Social Care (if 18+ students on site) | 01793 463555<br>adultsafeguarding@swindon.gov.uk |
| Emergency Duty Service                        | 01793 466903                                     |

|   | Name         |  |
|---|--------------|--|
| Head teacher  | Chas Drew    | 01793 612727 ext 225                         |
| Chair of Governors  | Jokie Bakker | 01793 612727<br>gov.jbakker@commonweal.co.uk |
| Safeguarding Link Governor  | Jokie Bakker | 01793 612727<br>gov.jbakker@commonweal.co.uk |
| Local Authority Designated Officer / Designated Officer For Allegations | LADO         | 01793 463854                                 |

|                                |                      |
|--------------------------------|----------------------|
| Police                         | <b>101 /999</b>      |
| NSPCC Whistle-blowing Helpline | <b>0800 028 0285</b> |

## Our School's Commitment to Safeguarding

This school takes seriously its responsibility to protect, safeguard and promote the welfare of the children and young people in its care.

"The welfare of the pupil is paramount." (Children Act 1989.)

Our staff and governors are committed to safeguarding the pupils at this school and contribute to multi-agency working to keep pupils and students safe.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

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

All adults working in our school maintain an attitude of 'it could happen here'. We recognise that staff, because of their contact with and knowledge of children in their care, are well placed to identify abuse, neglect and exploitation and offer support to children in need.

This policy and set of procedures work in line with the relevant legislation, statutory guidance and take account of non- statutory guidance, all of which are listed in Appendix 1

### Part 1 – Procedures

#### Worried About A **Student**

See also ['What to do If you're worried a child is being abused'](#) - DfE March 2015

[You may be worried about a pupil because you have seen or heard something. You may have noticed a change in their behaviour.](#)

Where a pupil comes to speak to you directly and tells you information which may suggest they are at risk of abuse, neglect or exploitation, this is known as a disclosure. If a pupil discloses to you, you should:

- **Reassure** the pupil that they being taken seriously and that they will be supported and kept safe
- **Listen** to what the pupil is saying, without displaying any signs of shock or disbelief
- **Allow** the pupil to talk freely without interrupting
- **Reassure** the pupil but do not make promises about keeping the information a secret
- **Reassure** the pupil that this is not their fault
- **Ask** questions only if you need to clarify, take care not to put words in their mouth by asking leading questions

- **Explain** to the pupil that they have done the right thing by telling you and explain what you will do next, in line with the procedures outlined below.

All staff should be aware that children may not feel ready or know how to tell someone they are being abused, and/or they may not recognise their experiences as harmful. This should not prevent you from having a professional curiosity and speaking to the DSL if you have concerns.

You may not have received a direct disclosure, but you may have over-heard a conversation which worries you. You may have seen a mark on a pupil which worries you or noticed a change in behaviour. You may be concerned about the safety or welfare of a pupil who is not in school. You have a responsibility to follow the steps below:

### Step 1

- If you are concerned that a pupil might be in immediate danger or at risk of significant harm you must act immediately. Do you need to take immediate action to secure the safety of the pupil?
- Report your concerns directly to a member of the safeguarding team, as soon as possible. Where possible, this should be done 'face to face' before the end of the school day. A decision may need to be taken about whether it is safe for the pupil to return home.

In the first instance our Designated Safeguarding Lead

Maz Drew [mdrew@commonweal.co.uk](mailto:mdrew@commonweal.co.uk) Ext 667/001

If the DSL is unavailable, please report to our deputy DSL/s

Wendy Butcher [WButcher@commonweal.co.uk](mailto:WButcher@commonweal.co.uk) ext 234/001

James Woods [jwoods@commonweal.co.uk](mailto:jwoods@commonweal.co.uk) ext 292/001

Ali Merk [amerk@commonweal.co.uk](mailto:amerk@commonweal.co.uk) ext 296/001

Hazel McKay (C6) [hmckay@commonweal.co.uk](mailto:hmckay@commonweal.co.uk) ext 670

Crystal Clifford-Budden (SEN) [cclifford-budden@commonweal.co.uk](mailto:cclifford-budden@commonweal.co.uk) ext 237/255

Kerhys Lang [klang@commonweal.co.uk](mailto:klang@commonweal.co.uk) ext 667/112

If no-one from your safeguarding team is available, speak to the most senior member of staff on site. If this is you, please refer to 'Role of DSL'.

- If your concern relates to child on child abuse, refer also to Part 2 of this document and see also Part 5 of KCSIE.

### Step 2

- Record your concerns using CPOMS the school's safeguarding/child protection concern/incident form soon as possible.
- Use the link on the Commonweal Portal or click this link <https://commonweal.cpoms.net/> copy of the incident form can be found at the back of this policy and also in the event where CPOMS was down there is a copy of the 'Cause for Concern *if cpoms was down*, form on *T drive* in the folder *Cause for concern form*

### Guidance on recording your concern

- Record the full date and time, location, your name and role and keep your record as factual as possible.
- Use full names, not initials as we need to be able to identify who individuals are.

- Use the pupil's own words where applicable and enclose any direct quotes in quotation marks.
- Include what is it that you have seen/heard/noticed which concerns you?  
Has the pupil communicated that something is wrong? Verbally? Behaviour?
- Ensure your record is clear and factual. If you have included your opinion in your report, have you made it clear that this is your opinion?
- Include why what you have seen/heard/noticed concerns you? What are you worried will happen if this concern/incident is not responded to?
- Is there any context you may be aware of?  
Is this concern the first or have you had other concerns?
- Include any actions you have already taken.
- If marks or injuries have been observed, record these on a body map. (Do not take photographs)
- If a safeguarding/child protection concern/incident form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up / typed up onto a form).

**Remember that records can be accessed by parents/carers and may also be used in multi-agency meetings and in criminal proceedings. Records should be clear, comprehensive and professionally written.**

### Step 3

- Include whether you have spoken to parents/carers about the concern/incident. Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the child. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.
- The original concern form should be passed, in person, to the DSL/Deputy DSL.
- Information should always be kept secure and confidential.
- Copies should not be retained by you

### Step 4

- You should receive feedback about what action, if any is being taken in response to your concern. A recommended timescale for this is within 24 hours. If you do not receive feedback or you feel that the situation is not improving for the pupil, you have a duty to follow up your concern with the DSL / deputy DSL.
- See section on Whistle-blowing also.

Additional consideration needs to be given to pupils with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

## **When Are Parents/Carers Contacted?**

Concerns about the welfare or safety of pupils will be discussed with the parent/carer, unless, having reviewed the information of concern, it is the view of the safeguarding team that this may increase the risk to the pupil. Following consultation with the school's safeguarding team, it may be the pupil's **Head of House or Deputy Head of House** who makes contact with the parents/carers or

it may be a member of the safeguarding team themselves. Our first priority is the pupil's welfare and therefore there may be occasions when concerns about a pupil means that we have to consult other agencies before we contact the parent/carer.

If a referral is to be made to Children's Social Care, the parent/carer will be contacted by a member of the school's safeguarding team and the information within the referral will be shared. There are some occasions when the school will be advised not to share the content of the referral with the parent/ carer as to do so may increase the risk of harm to the pupil.

Where reports are written about pupils as part of the child protection process, the school will provide opportunity prior to the conference to share the content with parents and carers.

## The Role of The Designated Safeguarding Lead and Deputy DSL/s In Our School

Our Designated Safeguarding Lead is **MAZ DREW**, who works in line with the requirements of the role, as set out in Annex C of Keeping Children Safe In Education Sept 2023.

Our deputy DSLs are *WENDY BUTCHER, JAMES WOODS, ALI MERK, HAZLE MCKAY (C6), CRYSTAL CLIFFORD-BUDDEN (SEN) and KERHYS LANG* and are available in the absence of the DSL.

The members of our safeguarding team work in partnership with a range of other agencies, including Local Partners, to keep pupils safe. This includes information-sharing, provision of reports and attendance at multi-agency meetings including child protection conferences and core groups

What happens once a concern /disclosure has been reported to a member of the safeguarding team?

The DSL or deputy DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:-

### Step 1

- If there is concern that the pupil is in immediate danger contact Children's Social Care/Adult's Social Care Swindon's Multi- Agency Safeguarding Hub team on 01793 466903. (Emergency duty service is 01793 436699) *Adult Social care if the concern is about a Vulnerable Adult (Sixth Form) contact Swindon's Adult Safeguarding Team on 01793 463555 or adultsafeguarding@swindon.gov.uk.* You may also consider contacting the police on 999. **Go to section 'Making a referral to Social Care' (page 9)**

### Step 2

- Contact the parent/s or carer/s of the pupil concerned, if this has not already been done. You may wish to take advice from Children's Social Care before contacting the parent/carer. If, having sought advice, you believe that sharing this information may increase the risk of harm to the pupil do not share with parents at this stage. You must document your decision-making here if the decision is made not to share information with parents/carers. In the majority of cases informing the parents/carers of the concern / disclosure which has

been reported will not increase risk. Ask for any additional information from the parent/carer if applicable.

- Ensure that the parent/carer understands that a record will be kept by the school.

### Step 3

- Refer to the local authority threshold document (*The Right Help at the Right Time*) to support decision-making about what action is now required.
- What are the risks to the child? Are they familial; posed by someone in the child's family? Are they extra-familial; posed by adults or peers outside of the home?  
(See Part 1 of KCSIE for further information)
- If the concern does not require immediate contact with Children's/Adult's Social Care consider this latest concern within the context of any wider concerns / disclosures. This may mean further discussion with the pupil's **class teacher /student's tutor or House team** and /or referring back to safeguarding or child protection records if they exist.

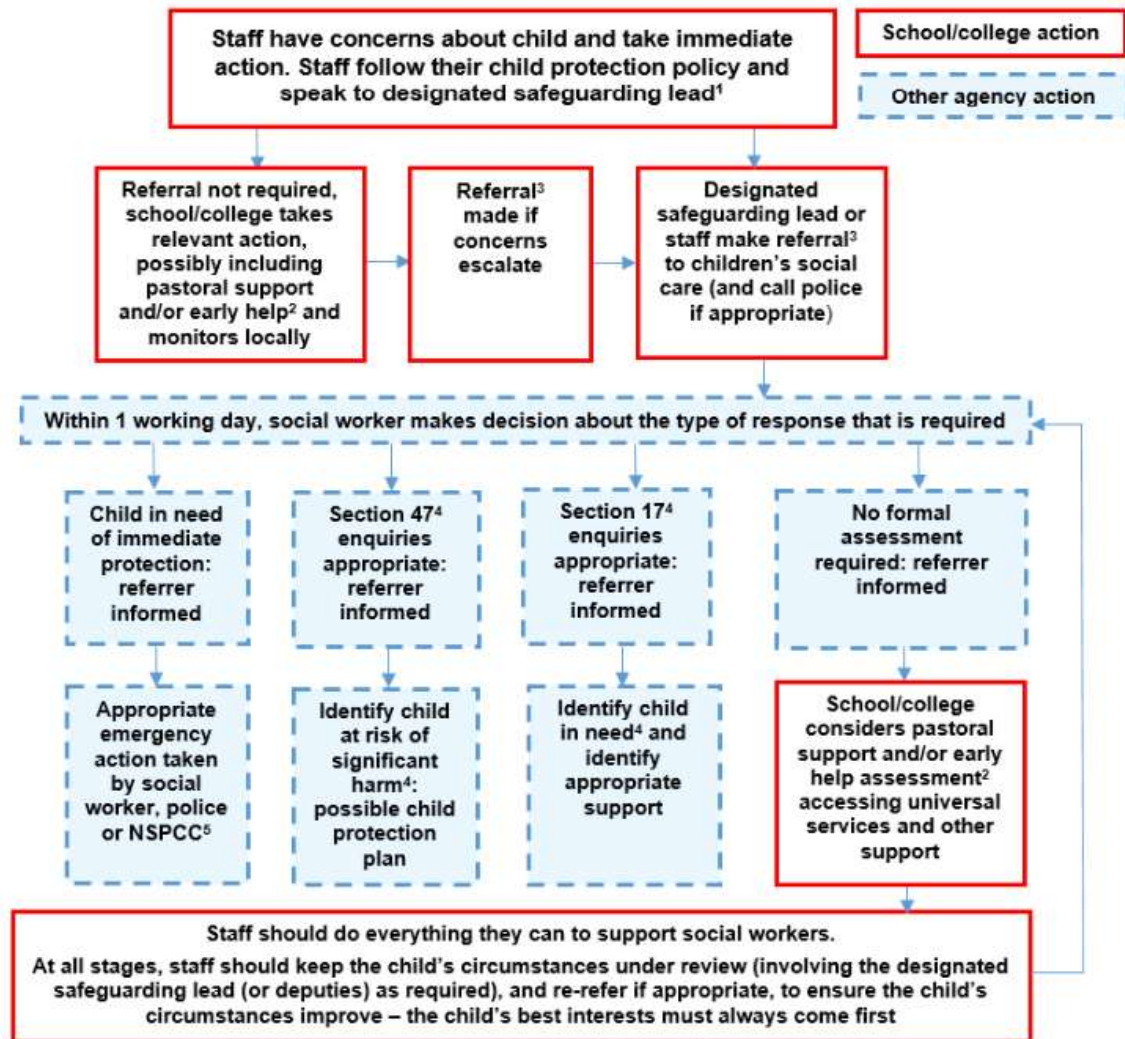
### Step 4

- Ensure that the member of staff reporting the initial concern has received feedback about actions and outcomes (if applicable).

### Step 5

- Update record-keeping with information about identified actions, completed actions, decision-making (where applicable) and outcomes (as appropriate).

## Actions where there are concerns about a child



Flowchart taken from 'Keeping Children Safe In Education' Sept 23

### Early Help

See also page 7 KCSIE Sept 23

What do we mean by Early Help?

Effective early help relies upon local agencies, including education working together to:

- identify children and families who would benefit from early help;
- undertake an assessment of the need for early help; and
- provide targeted early help services to address the assessed needs of a pupil and their family which focuses on activity to significantly improve the outcomes for the pupil.

How are children and families identified for Early Help?



In our school staff are alert to the fact that early signs of abuse and/or neglect can be indicators that support is needed. Any child may benefit from early help, but staff should be particularly alert to a child who:

- is disabled or has certain health conditions and has specific additional needs
- has special educational needs
- has a mental health need
- is a young carer
- shows signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing from care or home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised
- has a family member in prison or is affected by a parent offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is mis-using drugs or alcohol themselves
- has returned to family home from care
- is at risk of honour-based violence such as female genital mutilation or forced marriage
- is a privately fostered child
- is persistently absent from education

### What support is provided as part of the school's Early Help offer?

The School's Early Help offer includes Nurture groups in The Hub, social Club for Year 7 transition, VIP (vulnerable intervention person), pastoral support (from pastoral support officer) and referrals to other agencies that can support the child and family such as school nurse, U-Turn, Women's Aid, RESPECT, On trak, Tamhs, YEW, EP, Trailblazer, NSPCC, DART programme, Step project, Fresh moves, smash, Young carers & Aiming high.

*Also support from the student support team refer to our Hub offer document in T Drive*

[T:\Child Protection\Safeguarding Policy Reference documents](#)

### How does the Early Help process work?

[Swindon Local Offer - Early Help](#)

### Making A Referral to Children's Social Care/Adult's Social Care –

See also pages **17-18 KCSIE Sept 23**

School safeguarding teams should refer to the local authority threshold guidance when making a decision to refer to social care. There are a number of additional 'frameworks' which can also be considered at this stage e.g. The Brook Tool, Neglect Framework, Graded care profile

A referral may be required because:

- Early Help support has been offered but there is little or no evidence that this is having any impact for the pupil and their 'lived experience' is not improving

- a pupil is suffering or is likely to suffer from harm

In the first instance this should be made by telephone *Swindon MASH 01793 466903*

It is useful to have any safeguarding/child protection records to hand. Following a telephone referral, you will be required to submit a written referral within 24 hours.

Points to consider when completing a referral:

- Where possible include the 'voice' of the pupil, including any behaviours displayed which may indicate an unmet need.
- Provide a picture of what life is like for the pupil. What is their 'lived experience'?
- Is the risk posed familial or extra-familial? Have you included what else you know about the wider family, environment and context the pupil lives in?
- From the school's perspective, what are your worries for this pupil?
- Are there any safety factors? Are there any times when the school is less worried?

The completed referral will be shared with parents/carers, who will be asked to provide consent to the information being shared with social care. If consent is not given, or the referrer deems that it would place the pupil at risk to share the referral prior to reporting to social care, the information can still be shared where there is good reason to do so.

### Support for The Pupil

Staff are in a position to identify concerns early, provide help for pupils, promote pupils' welfare and prevent concerns from escalating.

To promote pupils' welfare we provide the following support:

*Once the referral has gone to Social Care the DSL or DDSL will keep the child and family updated and support them through the process along with the student support team which can include the Tutor, Deputy and Head of House. If it is felt to be needed the child can be referred to VIP for additional support.*

### Record-keeping

Any member of staff, visitor or volunteer who has a concern about a pupil's welfare or receives a disclosure of abuse will make an accurate record, as soon as possible, noting what was said or seen, putting the event into context and giving the full date, time and location. Where possible this will be noted on **CPOMS the school's safeguarding and child protection concern electronic system**. If injuries or marks have been observed which cause concern, these should be recorded on a body map outline, giving an indication of size and whether there is a defined shape to the mark or injury.

Photographs should not be taken.

Any handwritten notes (not captured on the safeguarding and child protection concern/incident form) will be retained, even if they are subsequently written up.

### Chronologies

Individual pupil chronologies will be kept up to date and reviewed at regular intervals. All 'significant events' are captured on this chronology, including attendance at meetings, phone calls and emails in relation to safeguarding and /or child protection matters. This chronology also captures headline information about what action has been taken and the outcome of this action. The outcome should focus, where possible, on the pupil and indicate whether the situation is improving.

### Case file review

Safeguarding and child protection files for individual pupils should be re-visited regularly to ensure any risk is being reduced and appropriate taken. It is good practice for this review to take place on a termly basis. *This happens as part of line manager meetings with Heads of House and Student Support staff and at student support fortnightly meetings*

To ensure that all files are reviewed an overview of all pupils (where there are safeguarding / child protection concerns) is kept up to date. This is a 'live' document and reflects the numbers of pupil's subject to child protection, child in need or receiving early help support.

### Transfer of records when a pupil moves to a new school

When a pupil moves school/college, safeguarding / child protection original documentation will be passed as soon as possible and confidentially to the receiving school, separate from academic records. Where possible, the DSL will arrange to meet the DSL of the new school to discuss the documentation. The receiving school is asked to sign to confirm receipt of the information and this confirmation is stored on file.

### Record Retention

*Year 13 and 14 Students records are kept for 25 years from Date of birth in line with guidance They are stored in a secure storage space on site with other school archives.  
Students who are home schooled – records are held in the same way until 25<sup>th</sup> birthday*

The school will retain records for pupils:

- who have been withdrawn to be home-schooled, if there is an existing safeguarding /child protection file.
- Where they are the last educational provider for the pupil

All records are stored in line with the school's Publication Scheme.

Further guidance on the retention of records can also be found at <https://irms.org.uk/page/SchoolsToolkit>

### Escalation

#### In school

- If a member of staff does not see any improvement having reported a concern about a pupil, they have a duty to re-report to a member of the safeguarding team.
- If it is felt that the safeguarding team is not taking their concern seriously then this must be escalated to the Head teacher or the Chair of Governors (if the Head teacher is a member of the safeguarding team). See also section 'Whistle-blowing'.

## External

- If a member of the safeguarding team feels a decision made by another professional in another agency is not in the pupil's best interests, they must discuss this further. In the first instance, this takes place directly with the professional involved to allow opportunity for decision-making to be discussed and clarified. (Pre-escalation)
- If pre-escalation fails to resolve the issues identified, the member of the safeguarding team should escalate within their own organisation (to the Head teacher if they are not in this role). The issue is then escalated to the professional's line-manager. (Escalation/Case Resolution)
- At all stages records should be kept.
- The Head teacher will ensure that the intention to instigate escalation procedures is made explicit and in writing.

## **Worried About the Actions of an Adult who Works/Volunteers with Children**

*See also Part 4 KCSIE*

You may be worried about the actions of an adult who is working/volunteering with children. The adult may be:

- an employee of the school
- a supply teacher
- an adult working with the school, employed by a third party (including staff working in after school clubs/lettings, alternative and enhanced provision and contractors)
- a volunteer

You may have seen or heard something which makes you feel uncomfortable.

You may be concerned that the adult's actions are contravening the school's staff code of conduct.

### Commonweal Staff Conduct and Standards

You may be aware of a situation the adult is involved in, outside of school, which suggests they may not be safe to work/volunteer with children and young people.

All concerns must be reported following the steps below:

#### Step 1

- If you are concerned that a child might be in immediate danger or at risk of significant harm you must act immediately. Do you need to take immediate action to secure the safety of the pupil?
- Report your concerns directly to the Head teacher as soon as possible.  
*Chas Drew [CDrew@commonweal.co.uk](mailto:CDrew@commonweal.co.uk) ext 225*
- If the Head teacher is not contactable, report to the most senior member of staff on site.
- If your concerns are about the DSL (Maz Drew) report your concerns directly to the deputy head teacher (Student Support) as soon as possible *Ali Merk [amerk@commonweal.co.uk](mailto:amerk@commonweal.co.uk) ext 296*
- If your concerns are about the Head teacher/Principal report to the Chair of Governors directly.  
*Jokie Bakker [gov.jbakker@commonweal.co.uk](mailto:gov.jbakker@commonweal.co.uk) Head's PA, Liz Daryan keeps a copy of her phone number if required, do not share details of concern with PA)*

## Step 2

- Record your concerns using the school's 'Concern/Disclosure' form (see Appendix 5), as soon as possible. *This form is located on the T Drive in the Cause for Concern Folder on **Concern about an adult in school form***

*T:\Child Protection\Cause for concern form*

- Staff should NOT record allegations or concerns about adults working or volunteering with pupils on electronic pupil record systems.
- Remember to record the full date and time, your name and role and keep your record as factual as possible.
- If a concern/disclosure form is unavailable, handwritten notes can be made on a piece of paper. (This must be retained, even if the notes are subsequently written up onto a form).

## Step 3

- Record what action you are taking, for example record the name of the member of staff you have reported to.
- The original concern form should be passed to the Head teacher/ Principal or the Chair of Governors, if the concern/allegation involves the Head teacher/Principal. Copies should not be retained by you.
- If the person you have reported the concern to does not take your concern seriously, you must escalate your concern to the Chair of Governors or CEO (if you are part of a Trust/Federation). Ultimately anyone can report a safeguarding concern about an adult working with children into the local authority, asking to speak to the Local Authority Designated Officer (LADO)/ Designated Officer For Allegations (DOFA). See Quick Reference Contact Guide on page 2.

### **The Role of the Head teacher/Chair of Governors when dealing with low level concerns or allegations involving adults who work/volunteer with children**

- The Head teacher/ Chair of Governors will consider the information in the report and initial consideration will be given as to whether this indicates that the person would pose a risk of harm if they continue to work in close or regular contact with children in their present position or in any capacity.

Is there evidence to suggest that the harms threshold has been met:-

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

*Criteria listed above taken from Part 4 of 'Keeping Children Safe In Education' **Sept 2023***

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

See also further guidance in detail included in pages 87-100 KCSIE

If initial information in the report suggests that the threshold has been met, the Head teacher/Chair of Governors will follow Section 1 of Part 4 of KCSIE (Sept 21)- 'Allegations that meet the harms threshold.

Where the allegation relates to an adult externally employed/contracted, the head teacher (Chas Drew) will inform the employer of the allegation.

#### Step 1

- The Head teacher/Chair of Governors will contact the LADO/DOFA immediately, before commencing any form of investigation. Schools are permitted to conduct basic enquiries, (see page 83 of KCSIE) to establish the facts, however care should be taken not to jeopardise any future police investigation.

#### Step 2

The LADO/DOFA will decide on further action:

- strategy discussion/meeting, or
- advice and follow up from LADO/DOFA, or
- no further action by the LADO/DOFA after initial consideration and closure

If further action is agreed, the LADO/DOFA will agree with the police whether or not a strategy discussion/ meeting needs to take place. If it is agreed that the threshold has not been met for a strategy discussion/meeting, an allegations management meeting may be held. The main purpose of this is to ensure the safety of the children and ensure the process is concluded promptly, ensuring the accused staff member has adequate support.

At the conclusion of investigations, an outcome will be agreed by the LADO/DOFA:

- Substantiated: there is sufficient evidence to prove the allegation
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation
- False: there is sufficient evidence to disprove the allegation
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

A record of the outcome of all allegations involving the LADO/DOFA is held. *Information is held on Child Protection L drive on LADO folder and also on HR records*

At the end of the allegation process if a member of staff or volunteer is removed from their position for causing harm or posing a risk of harm or they leave whilst investigations are on-going, the school has a duty to inform the Disclosure and Barring Service via a referral.

Where a decision is made to dismiss or cease to use **the services of a teacher** because of serious misconduct, or they might have been dismissed or their services ceased had they not left first, the school will consider whether to refer to the Teaching Regulations Agency.

We understand, as a school, that if we know or have reason to believe that an individual is barred, we are committing an offence if we allow the individual to carry out any form of regulated activity.

### Concerns that do not meet the harm threshold

See also pages **100-104**

Creating an environment with a strong culture of safeguarding, where pupils are kept safe involves ensuring that **all** concerns about adults who work/volunteer with children are shared responsibly, with the right person, recorded and dealt with appropriately.

A low-level concern may be a sense of unease, a nagging doubt, or noticing that an adult appears to be contravening the school's staff /visitor code of conduct. It may include 'over-friendliness with a pupil/pupil's, having a favourite pupil, engaging with a pupil on a one to one basis in a secluded area of the school.

Staff, volunteers and external visitors must share **all concerns which arise**, even if they do not believe the harm threshold has been met. Just because a concern does not meet the harm threshold does **not** mean it is insignificant.

#### Possible actions

- The Head teacher may still consider contacting the LADO/DOFA for further guidance if required.
- The Head teacher will consider what action needs to be taken to address the low level concern/s, which may include additional staff training, mentoring and/or a verbal or written warning. Advice may be sought from the school's HR provider here.
- It is important that all low-level concerns are recorded, to identify whether a pattern of worrying behaviour is emerging. This chronology of concerns may trigger a referral into the LADO where a pattern emerges.

#### Code of conduct

Staff, volunteers and external visitors are provided with our school's code of conduct and sign to confirm that they have read and understand expectations about their behaviour. Ensuring that this process is followed robustly helps keep children safe.

Unprofessional behaviour which breaches our staff code of conduct is addressed at an early stage and the individual supported.

### Supporting the welfare of the child

Where a child has been harmed, there is immediate risk of harm or the situation is an emergency contact will be made with Children's Social Care and as appropriate the Police.

As a school we will support pupils as outlined on Page 9

## Supporting the welfare of the adult at the centre of the concern/allegation

Employers have a duty of care for their employees. The Head teacher/Chair of Governors/ must put in place support for the adult at the centre of the concern/allegation.

*Support at Commonweal will be provided as appropriate on a case by case basis.*

### Record-keeping

All low level concerns and allegations about adults who are working or volunteering with children should be recorded on the school's 'Concerns / Allegations Record For

Adults working or volunteering with children/young people' (see Appendix 5).

Records are stored confidentially and securely and comply with the data Protection Act 2018 and the UK GDPR Act.

### Allegations which meet the threshold

The following information is kept on file:

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

Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry Into Child Sexual Abuse (IICSA) for the term of the enquiry. All other records should be retained at least until the accused has reached normal pension age or a period of 10 years from the date of the allegation if that is longer.

Further information can be found on the [ICO website](#).

### Low level concerns

The following information should be recorded:

- Details of the concern and the context in which the concern arose
- Action taken
- If advice was taken as to whether the LADO/DOFA was contacted for guidance

This information is retained until the individual leaves employment/volunteering role with the school.

Where a pattern of concerns emerges, these are recorded on a chronology. These are reviewed to decide whether the pattern of behaviour moves to concern to meeting the harms threshold, in which case it will be referred to the LADO/DOFA.

### Following an allegation or low level concern

Consideration will be given as to whether there are areas of the schools safeguarding practice and procedure or wider cultural issues within the school which need addressing following an allegation or low level concern. Where appropriate, policies will be revised or additional training provided to minimise the risk of this happening again.

### Part 2 - Specific Safeguarding Themes

*See also Pages 10-15 and Annex B KCSIE*



Knowing what to look for is vital for the early identification of abuse, neglect and specific safeguarding issues such as exploitation.

If you are at all unsure you should **always** speak to the safeguarding team.

### Child on Child Abuse

See also pages 12-13, 40-41, Part 5 KCSIE and Annex B

We recognise that children are capable of abusing other children. This can happen both inside and outside of school and online. A child may not find it easy to report child on child abuse and we recognise that they might show signs or act in ways that they hope an adult will notice, including a change in behaviour. Even if there are no reported cases of child on child abuse, we recognise that abuse may still be taking place but not being reported. We understand that the pupil who is perpetrating the abuse may also be at risk of harm and we will make every effort to ensure that the perpetrator is supported appropriately.

### Procedures in place to minimise the risk

- The school's ethos encourages pupils to raise concerns with staff, knowing that they will be listened to, believed and valued. (This can be seen at **Commonweal** in posters around school, start of term assemblies and support pages in their planners as well as the school website.
- Systems are in place for pupils to confidently report abuse, knowing their concerns will be taken seriously.
- We deliver a Relationships and Sex Education and Health Education (Secondary) curriculum in line with the DfE statutory guidance. This develops pupils' understanding of healthy relationships, acceptable behaviour and keeping themselves safe. This curriculum is broad, balanced and covers a range of safeguarding themes. It is progressive across the year groups

Themes covered are age appropriate and include

- Staying safe- e safety and road safety
- Healthy lifestyles – addiction and smoking
- Loss
- Knife and gun crime
- Healthy Relationships
- Mental Health
- Positive Relationships
- Understanding Ourselves- What makes a human? What is Britishness?
- Healthy Lifestyles – sleep, alcohol and drugs.
- Body Image and Eating disorders
- First Aid

Assemblies are another opportunity to deliver key safeguarding messages to different year groups and this has included Online Safety, Anti-bullying, CSE, healthy relationships and consent.

- Staff receive regular training to ensure they know the signs and indicators which may suggest a pupil is at risk of child on child abuse and understand their role and responsibilities to report to the safeguarding team as soon as possible.
- Our school has a zero tolerance approach to abuse and regular staff training ensures that incidents of peer on peer abuse are never passed off as 'banter', part of growing up or 'boys being boys'. All incidents of child on child abuse are reported to the safeguarding team.
- The school has a behaviour policy in place which is regularly reviewed and sets out the expectations about appropriate behaviour. Our policy makes clear that peer on peer abuse is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Following an incident where sexually harmful behaviour has been identified, the safeguarding team will ensure that risk to siblings is considered.
- Set out below are the different types of child on child abuse and the systems in place to respond to these.

Child on child abuse can take the form of:

### 1. Bullying (including Cyberbullying)

There is no legal definition of bullying. However, it's usually defined as behaviour that is:

- Repeated (although not always)
- intended to hurt someone either physically or emotionally
- often aimed at certain groups, for example because of race, religion, gender or sexual orientation

This can include:

- physical assault
- teasing
- making threats
- name calling
- Cyberbullying - bullying via mobile phone or online (for example via email, social networks and chat rooms on gaming platforms)
- Racist and Religious Bullying: A range of hurtful behaviour, both physical and psychological, that makes a person feel unwelcome, marginalised, excluded, powerless or worthless because of their colour, ethnicity, culture, faith community, national origin or national status;
- Sexual, Sexist and Transphobic Bullying: includes any behaviour, whether physical or non-physical, where sexuality is used as a weapon by boys or girls;
- Homophobic Bullying: targets someone because of their sexual orientation (or perceived sexual orientation);
- Disablist Bullying: targets a young person based on their disability, special needs or health needs. This can include manipulative bullying where a perpetrator forces the victim to act in a certain way or exploiting a certain aspect of the victim's disability.

## Responding to concerns about bullying

Pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others, whether this is an isolated incident or a pattern of behaviours.

### Refer to The Commonweal School ANTI-BULLYING/CHILD ON CHILD ABUSE POLICY

- The School Student Support system proactively gathers and records concerns and intelligence about bullying incidents and issues so as to effectively develop strategies to prevent bullying from occurring. The bullying register records information about aspects such as Year Groups, location and time of the school day where bullying occurs so that patterns and causes of concern can be identified. The Student Support Team consider all opportunities for addressing bullying in all forms throughout the curriculum and supported with a range of approaches such as through displays, assemblies, peer support and the school/student council. The School regularly updates and evaluates its approaches to take into account the developments of technology and provide up-to-date advice and education to all members of the community regarding positive online behaviour.
- *Bullying incidents are recorded on CPOMS*

Child on child abuse can take the form of:

## 2. Sexual abuse

*See part 5 of KCSIE*

This can include:

- Sexual violence and sexual harassment - Sexual violence and sexual harassment can occur between two pupils of **any age and sex**, from Primary, into Secondary and into College. **We recognise that 'it could happen here'**. It can occur through a group of pupils sexually assaulting or sexually harassing a single pupil or group of pupils. 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.

Sexual violence can include:

- Rape
- Assault by penetration
- Sexual Assault

Sexual harassment can include:

- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance, calling someone sexualised names
- Sexual 'jokes' or taunting
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature
- Inappropriate/unwanted touching
- Consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams (also known as sexting or youth produced sexual imagery)
- Up-skirting

### Child on Child sexual abuse can also include:

- 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.
- Initiation/hazing - refers to the practice of rituals, challenges, and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group

### **Responding to concerns about Child on Child sexual abuse**

#### Step 1

- Immediate consideration should be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted upon).

#### Step 2

- **Record** the incident using the school's safeguarding recording procedures and **report** to the DSL / deputy in line with safeguarding and child protection procedures, as soon as possible. Is information about the incident first hand or do other individuals need to be spoken to, to confirm?

#### Step 3

- The DSL will consider the following:
  1. The wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and support they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children. A victim should never be given the impression that they are creating a problem, nor should they be made to feel ashamed for making a report. It will be explained that the law is in place to protect children/young people rather than criminalise them.
  2. Has a criminal offence been committed? If yes, contact the police (See also '**When To call the Police**' (NPCC) .
  3. Ages of pupils / developmental stage.
  4. Whether there is a power imbalance between the children.
  5. Whether the alleged incident is a one off incident or there is a sustained pattern.
  6. Any on-going risks to the victim, other children, or staff.
  7. Other related issues and the wider context, including whether there is evidence of the victim/s being exploited, criminally and/or sexually.

#### Step 4

- If there is no evidence to suggest that a criminal offence has taken place the DSL will consider next steps, in discussion with parents/carers unless to do so would increase the risk to the pupils involved.
- If there is evidence to suggest that a criminal offence has taken place the DSL will follow the guidance on pages 121-124 of KCSIE. Any report to the police will be in parallel with a referral to children's/adults' social care

#### This will typically involve:

1. Considering support, including Early Help support for both the victim and perpetrator (does

- the perpetrator have unmet needs?)
2. Making a referral to children's/adult's social care if the victim has been harmed or is at risk of harm.
  3. Making a referral to children's/adult's social care if the perpetrator is at risk of harm / being harmed (under-lying welfare and safety concerns which may have triggered behaviours).
  4. Writing a risk assessment for pupils, who have been identified as being at increased risk of child on child abuse (considered for both the pupil perpetrating the abuse and the pupil who is the victim) to include protection and support.
  5. Considering targeted education about healthy relations for the perpetrator and any additional sanctions under the school's behaviour policy.

### **Additional guidance for responding to consensual and non-consensual sharing of nude and semi-nude images, videos and/or livestreams**

#### Step 1

- Report to your DSL immediately.
- **Never** view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – **this is illegal**.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- **Do not** delete the imagery or ask the young person to delete it.
- **Do not** ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- **Do not** share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- **Do not** say or do anything to blame or shame any young people involved.
- **Do** explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

*Taken from UKCIS guidance*

#### Step 2

- The DSL will hold an initial review meeting with appropriate staff. This may include the staff member who was initially made aware of the incident/concern and the leadership team.

The following risk factors will be considered:

1. Significant age difference between the sender/receiver involved
2. If staff recognise the pupil as more vulnerable than is usual (ie at risk)
3. If the image is of a severe or extreme nature
4. If the situation is not isolated and the image has been more widely distributed
5. If this is not the first time the pupil has been involved in a sexting act
6. If other knowledge of either the sender/recipient <sup>SEP</sup> may add cause for concern (ie difficult home circumstances)

### Step 3

- A referral will be made to children's/adults' social care (and/or the police immediately if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process.

### Step 4

- Interviews will take place with those involved.

### Step 5

- Parents/carers should be informed at an early stage and involved in the process in order to best support the child or young person, unless there is good reason to believe that involving them would put the child or young person at risk.

### Step 6

- Safeguarding records will be updated using the school's safeguarding recording procedures, including actions taken / not taken and the justification for these decisions (linked to the points above).

## Harmful Sexual Behaviour

*Sexually harmful behaviour from children does not always occur with the intent to harm others. There may be many reasons why a child engages in sexually harmful behaviour and it may be just as distressing to the child who instigates it as well as the child it is intended towards. For this reason, consideration will always be given to how the child displaying the behaviour is supported, in addition to the 'victim' of the behaviour. This may include a referral to social care. Sexually harmful behaviour may range from inappropriate sexual language, inappropriate role play, to sexually touching another or sexual assault / abuse.*

Taken from Tri.X 'Peer on Peer Abuse' Briefing 198 (Feb 2017)

To support our judgements about sexualised behaviours we refer to the '[Brook Sexual Behaviours Traffic Light Tool](#)'. Where a behaviour is identified as amber or red our safeguarding procedures will be followed here, and a referral made to social care as appropriate, for both the pupil displaying the behaviours and also any pupil who has been involved and may have been harmed.

## Exploitation and Serious Violent Crime

See also Page 13-14 Annex B KCSIE and the County lines toolkit

This school recognises that children can be exploited sexually (CSE) or criminally (CCE). CSE and CCE can affect children, both male and female and can involve children who have been trafficked. They may be at risk of or involved in serious violent crime.

## Child Criminal Exploitation

Child Criminal Exploitation is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the

perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

The following can be indicators of CCE:

- Unexplained gifts or new possessions
- Children who associate with other young people involved in exploitation
- Changes in emotional well-being
- Misuse of drugs and alcohol
- Periods of time missing or regularly coming home late
- Children who regularly miss school or education or do not take part in education
- Carrying knives or weapons for a sense of protection from harm from others

CCE can include children being forced to shoplift or pickpocket, forced to threaten other young people, forced to work in cannabis factories, being coerced into moving drugs or money around the local area or across counties (County Lines).

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

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

### **Child Sexual Exploitation**

Child Sexual Exploitation occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- Children who have older boyfriends or girlfriends
- Children who suffer from sexually transmitted infections or become pregnant

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

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

### **Responding to concerns that a pupil might be being exploited**

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate (including support, if applicable, for the pupil who is deemed to be 'perpetrating' the abuse.)

[See also section above on child on child abuse and 'When To call the Police' \(NPCC\)](#)

### [Honour-based abuse, including Female Genital Mutilation](#)

*See also Annex B KCSIE and <https://www.gov.uk/guidance/forced-marriage> and also [multi-agency statutory guidance on Forced Marriage](#)*

Honour-based abuse 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 (FGM), forced marriage and practices such as breast-ironing.

### **Responding to concerns about honour-based abuse**

Abuse committed in the context of preserving honour often involves a wider network of family or community pressure and can involve multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what action to take.

Our safeguarding procedures will be followed here and staff should speak to a member of the safeguarding team immediately if they suspect a child or young person is at risk of honour-based abuse. Safeguarding teams will contact children's social care/ adults social care for anyone 18 or above and local protocols will be followed.

### **Female Genital Mutilation (FGM)**

*See Annex B and [Multi-agency statutory guidance on FGM \(July 2020\)](#) and [FGM factsheet](#)*

FGM is a procedure where the female genital organs are injured or changed and there is no medical reason for this. This practice is often referred to as 'cutting'. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death.

### [Key points](#)

- FGM is illegal in the UK. It is also illegal to take a British National or permanent resident abroad to undergo FGM or help someone who is trying to arrange to have FGM performed.
- FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.
- FGM is prevalent in 30 countries. These are concentrated in countries around the Atlantic coast to the Horn of Africa, in areas of the Middle East, and in some countries in Asia.



- FGM is a deeply embedded social norm, practised by families for a variety of complex reasons. It is often thought to be essential for a girl to become a proper woman, and to be marriageable. This practice is not required by any religion.

### Risk Factors

The most significant factor to consider when deciding whether a girl or woman may be at risk of FGM is whether her family has a history of practising FGM.

In addition, it is important to consider whether FGM is known to be practised in her community or country of origin. It is important not to make assumptions that all girls from these communities are at risk.

A parent may request permission for their child to travel overseas for an extended period. This is sometimes requested leading into or out of a school holiday (often the summer break).

### **Responding to concerns about Female Genital Mutilation**

If a girl has disclosed to you that she has been subjected to FGM or you have visual evidence of this, you must report it to the police.

(Teachers are required to report known cases of FGM in girls under 18 to the police under the mandatory reporting duty October 2015)

If a direct disclosure has not been made and there is no visual evidence, but you have concerns that the pupil may have been subject to or at risk of FGM the school's normal safeguarding procedures will be followed here.

This includes reporting your concerns to a member of the safeguarding team and putting your concerns in writing.

The DSL will follow the steps below to respond appropriately to the concern and safeguard the pupil:

#### Step 1

- Consider the information of concern. This may mean referring back to check whether there is any previous information of concern for the pupil.

#### Step 2

- Check whether there are any risk factors present for the pupil / family

#### Step 3

- Where it is deemed appropriate to do so, speak to the parent or carer about FGM. Be sensitive to language differences.

#### Step 4

- At this stage consideration should be given to make a referral to Children's Social Care. It is useful to have any safeguarding / child protection records to hand. Following a telephone referral, you will be required to submit a written referral within 24 hours.

See also:

FGM Helpline: 08000283550

Email: [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk)

Home Office Resource Pack - <http://www.gov.uk/government/publications/female-genital-mutilation-resource-pack>

## Preventing Radicalisation

*See Annex B Pages 135-137 and The Use of Social Media for Online Radicalisation (DfE July 15)*

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our 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.

(Definitions from the Government's Counter Extremism Strategy)

The following can be indicators of risk:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- advocating violence towards others

The internet provides children and young people with access to a wide-range of content, some of which is harmful. As a school we recognise that extremists use the internet, including social media, to share their messages.

## **Responding to concerns that a pupil might be at risk of radicalisation**

As a school we recognise that we have an important part to play in educating children about extremism and recognising when pupils start to become radicalised.

We ensure that through our school vision, values, rules, curriculum and teaching:

- we promote tolerance and respect for all cultures, faiths and lifestyles.
- the governing body also ensures that this ethos is reflected and implemented effectively in school policy and practice.
- pupils who attend our school have the right to learn in safety. We do not tolerate bullying of any kind and will challenge derogatory language and behaviour towards others.

- visitors who are invited to speak to pupils will be informed about our ethos and safeguarding procedures and relevant vetting checks are undertaken. We undertake due diligence to ensure that visiting speakers are appropriate. Speakers will be supervised at all times and will not be allowed to speak to children without a member of staff being present.

Local procedures for reporting concerns about possible radicalisation will be followed here Call Local Prevent team on 01380 826454 or 101

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate.

In addition, the DSL / deputy DSL may consider making a referral to the local authority Channel Panel (seek advice from Children's Social Care)

Channel is a multi-agency approach to provide support to individuals who are **susceptible** of being drawn into terrorist related activity.

Each local authority has a panel and it aims to:

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

**Referrals to Channel require the individual's consent.**

The DfE helpline can be contacted for advice 020 7340 7264 (this should not be used in cases of emergency) or via the e mail [counter.extremism@education.gsi.gov.uk](mailto:counter.extremism@education.gsi.gov.uk)

## Domestic Abuse

*See page 14 and Annex B KCSIE*

'Abusive behaviour' is defined in the Domestic Abuse Act (2021) as any of the following:

- physical or sexual abuse
- violent or threatening behaviour
- controlling or coercive behaviour
- economic abuse
- psychological, emotional or other abuse

For the definition to apply, both parties must be aged 16 or over and 'personally connected'.

It can encompass a wide range of behaviours and may be a single incident or a pattern of behaviours. The impact of domestic abuse on children and young people is detrimental and long term and can affect their health, well-being and ability to learn. Children and young people may see, hear or experience the effects of abuse

**Responding to concerns that a pupil might be subject to or witnessing domestic abuse**

Our safeguarding procedures will be followed here, and a referral made to social care as appropriate.

The DSL receives Encompass MASH Domestic Violence Disclosures (Operation Encompass) for students from the police. These are recorded on chronologies of the young person and a general check in with student is made dependant on the awareness of young person. School will then provide welfare check info to MASH if MASH call unless concerned about the student in which case school will make contact with MASH following usual safeguarding procedures. These are recorded on CPOMS

### Neglect

Working Together defines neglect as :-

'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, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

The following can be indicators of risk:

The following is a summary of some of the indicators that may suggest a child is at risk of or being neglected:

#### Physical indicators of neglect

Constant hunger and stealing food  
Poor personal hygiene - unkempt, dirty or smelly  
Underweight  
Dress unsuitable for weather  
Poor state of clothing  
Illness or injury untreated

#### Behavioural indicators of neglect

Constant tiredness  
Frequent absence from school or lateness  
Missing medical appointments  
Isolated among peers  
Frequently unsupervised  
Stealing or scavenging, especially food  
Destructive tendencies

Swindon Borough Council has a [Neglect Framework/toolkit](#), which you may wish to refer to. You may also wish to link the [Graded Care profile here](#).

## Pupils at greater risk of harm

### Pupils with disabilities, special educational needs (SEN) or certain health conditions

As a school, we recognise that pupils who have disabilities, SEN or certain health conditions can face additional safeguarding and child protection challenges.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the pupil's disability, SEN or health condition/s without further exploration
- pupils can be disproportionately impacted upon by things like bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers

### Pupils who need a social worker (including Children In Need, Children on a Child Protection Plan and Children Looked After)

Children may need a social worker due to safeguarding or welfare needs. They may need this help due to abuse, neglect and complex family circumstances. A child's experience of trauma and adversity can leave them vulnerable to further harm, as well as educationally disadvantaged, facing barriers to:-

- attendance
- learning
- behaviour
- mental health

As a school we ensure that all staff working directly with children/young people have a knowledge and understanding of the impact of adversity and trauma on children's mental and physical health, development and life chances. We understand that children can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. Our school behaviour policy reflects this and includes the ways in which we respond in these situations.

Teaching staff are supported by the members of the safeguarding team to maintain high aspirations for these children, identifying the challenges these children may face and making adjustments to teaching and learning to best support them.

The designated teacher for looked after children and previously looked after children is **ALI MERK**. The school staff work with multi-agency professionals, including the Local Authority Virtual Schools Head, to ensure that prompt action is taken when necessary to safeguard these children. We recognise these children are a particularly vulnerable group.

Appropriate staff are provided with information in relation to their legal status and contact arrangements, as well as information about the child's care arrangements.

## Pupils who are lesbian, gay, bi-sexual or transgender (LGBT)

As a school we recognise that whilst being LGBT is not in itself an inherent risk factor for harm, children who are LGBT can be targeted by other children. This can also be the case for children who are perceived by other children to be LGBT. Our staff recognise the importance of all children and young people having a trusted adult in school they can talk to and we endeavour to support all pupils to identify at least one trusted adult in school they can share concerns with if they don't feel safe.

## Pupils with mental health issues

Where children have suffered abuse and neglect, or other potentially traumatic experiences this can have a lasting impact throughout childhood, into adolescence and into adulthood.

Regular safeguarding training ensures that staff are aware of how these children's experiences can impact on their mental health.

The following can be indicators of risk:

- self-harm
  - noticeable weight loss or gain
  - change in personality eg mood swings
  - frequently missing lessons
  - social isolation
  - lethargy and disinterest
  - tearfulness or appearing anxious
  - lack of focus in class
  - change in educational performance
- 
- *Students at Commonweal are monitored by tutors and the House team although all staff are aware of the signs to look out for. In school tutors can be a first port of call for a student, but we also have 2 school counsellors and use the School nurse for intervention and 1 :1 work. WE are part of Trailblazer Project with referrals available to Education Mental Health Practitioners (EMHP) If necessary, we can refer to Tamhs for a school Tamhs worker or suggest through GP. Camhs meetings can be facilitated in school if Tamhs deem appropriate to refer on to Camhs. In year 11 some students have allocated Mentors who also help to prepare them to manage their mental health leading upto and through the exam period.*
  - *Posters around school promote wellbeing and good mental health and the topics also come up across the curriculum and in assemblies.*
  - *The Faculty of Curriculum Support also offers various interventions such as Nurture Groups, ASD support and calm spaces for students struggling with their mental health. All self-harm is reported to school nurse.*
  - *Students are signposted to appropriate websites and apps Headspace, Calm, Young minds, Kooth SHOUT*
  - *Staff raise concerns to DSL when they are worried about a student's mental health Information is recorded on CPOMS under mental health category*

## Self harm

Students are encouraged to share if they are self harming, or they know someone who is. Support is from staff in school and then outside agencies – parents are informed and also signposted to support listed above

First Aid is used as necessary, or we ask parents to pick up and take the child home or for further medical attention

## Behaviour and Attendance

As a school we recognise that there can be links between safeguarding and child protection concerns and:

- incidents of disruptive and challenging behaviour
- poor attendance

## Behaviour

We understand that children can communicate an unmet need through their behaviour, whether this is challenging and disruptive or quiet and withdrawn. **Our school behaviour policy reflects this and includes the ways in which we respond in these situations.**

See also the school's pupil behaviour policy.

*SIMS behaviour Management/Edulink is used to record incidents of disruptive and challenging behaviour. The member of staff or Pastoral team will record details of the incident with various options dependent on seriousness, the timeframe and other contextual factors.*

*Sanctions are needed to respond or prevent inappropriate behaviour.*

*A range of sanctions is clearly defined below and their use will be characterised by clarity of why the sanction is being applied and what changes in behaviour are required to avoid future sanctions.*

*The sanctions below form a graduated response framework in which we work within and will be followed in the manner which best suits the young person or circumstances. See the 2 slides below for the graduated response*

*Tutors and Heads and Deputy Heads of House monitor the Sims behaviour reporting and discuss issues with students and parents. The DSL attends Heads of House Meetings to cross reference behaviour issues of students with possible Safeguarding concerns.*

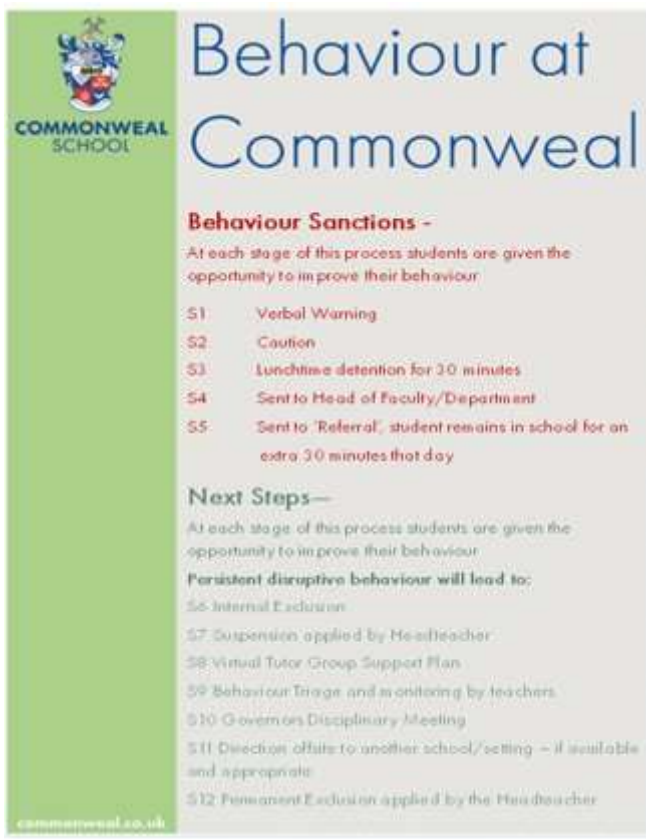
***S1 Verbal warning***

***S2 Caution***

***S3 Lunchtime detention for 30 minutes***

***S4 Sent to Head of Faculty /Department***

***S5 Sent to 'Referral', student remains in school for an extra 30 minutes that day***



See also the school's *Behaviour for Learning Policy - P25*.

## Physical Intervention

Where physical intervention is required to keep a pupil safe the school will respond in line with the [DfE guidance 'Use of reasonable force' July 2013](#).

As a school we may intervene to:

- remove a disruptive pupil from the classroom where they have refused to follow an instruction to do so;
- prevent a pupil behaving in a way that disrupts a school event or a school trip or visit;
- prevent a pupil leaving the classroom where allowing the pupil to leave would risk their safety or lead to behaviour that disrupts the behaviour of others;
- prevent a pupil from attacking a member of staff or another pupil, or to stop a fight in the playground; and
- restrain a pupil at risk of harming themselves through physical outbursts.

All incidents of physical intervention are recorded on CPOMS and reported to parents/carers. Where a pupil has safeguarding /child protection records in place, information about incidents of positive handling will be cross-referenced.

Following all incidents where physical intervention is required we routinely check the well-being of the pupil after the incident. This includes asking if they have been hurt.

If information suggests that a pupil has been hurt during an incident of physical intervention the Head teacher/Principal will be informed and contact will be made with the LADO/DOFA.



Where pupils require regular handling and intervention a positive handling plan will be put in place. The pupil, together with the parents/carers will be involved in this process.

*The Head teacher and authorised members of staff have the power to use reasonable force to prevent students committing an offence, injuring themselves or others, or damaging property, and to maintain good order and discipline in the classroom.*

*Head teachers and authorised school staff may also use such force as is reasonable given the circumstances when conducting a search without consent for knives or weapons, alcohol, illegal drugs, stolen items, tobacco and cigarette papers, fireworks, pornographic images or articles that have been or could be used to commit an offence or cause harm. Good practice is to inform parents if a child's bag is searched and where appropriate why this has happened, this process should be done with another member of staff present and consideration of gender of staff conducting a search. The school has trained key pastoral staff in 'Team Teach Positive Handling' and will maintain the appropriate level training to ensure that the relevant handling methods are prioritised when supporting our vulnerable students.*

## Attendance

See also ['Working Together To Improve Attendance' \(April 23\)](#)

See also the local authority's guidance on 'Children Missing Education'

As a school we recognise the importance of pupils attending school regularly. Any unexplained absence is followed up on the first day of absence

Where possible, we hold more than one emergency contact telephone number for each pupil/family.

Pupil attendance is monitored.

*Children Missing Education is a strong indicator of Safeguarding Issues.*

*Student attendance is closely monitored through the Pastoral House system. Parents are able to access their child's attendance records through the gateway Letters are sent out to parents as attendance starts to drop below **95%** advising them and informing them of the potential involvement of the Educational Welfare Service or a requirement to provide Medical Evidence if their child is ill.*

*On a daily basis the school has a first response system for Children Looked After, vulnerable and at risk students and also those students who are persistently absent. This means if they are not in school and we have had no contact from home to explain absence a call is made home first thing in the morning after registration at the start of lesson 1.*

*All students who are absent with no information provided should have been called by **1pm** on the first day of absence*

We recognise that children with poor attendance or missing from education may be more vulnerable and potentially are exposed to higher degrees of risk. Attendance information is therefore considered within the wider remit of safeguarding and child protection. Staff are aware that episodes of unexplained absence could indicate safeguarding concerns or the need for early help support.

## Attendance procedures during partial school closure/lockdowns

Include here a brief paragraph about how your school is recording attendance and safeguards in place if there is no response from pupils following an attempt to contact, including informing social care if the pupil is an open case.

### **Pupils who are educated off site**

Where pupils are attending off-site alternative or enhanced provision, it is our responsibility to ensure that they continue to be kept safe. Quality assurance of any provision used by our school is completed prior to the placement of a pupil. This includes:-

- review of the provision's safeguarding and child protection procedures
- a visit to the site
- a letter of assurance to confirm that all staff working at the alternative provision have had the appropriate recruitment checks
- information about issues which the pupil attending the site might be at risk of, to inform an effective risk assessment

For each day that the pupil attends the off-site provision contact is made *see below* to ensure they have arrived safely. This process also applies where a pupil has been excluded from school, including fixed term exclusions. Contact will be made with a parent or carer to confirm their safety on each day of the exclusion.

Students that attend college are monitored by college who will let Commonweal Attendance Officer know first thing if they are not present. School attendance procedures are then used to further investigate and manage (see above)

Alternative provision through EOTAS send Commonweal weekly reports to the Pastoral as Educational establishments they use their own attendance policy and procedures to monitor and manage.

### **Elective Home Education**

Where a parent/carer has expressed an intention to remove their child from school with a view to educating at home, we will endeavour to co-ordinate a meeting with the parents (and professionals as appropriate, including an LA representative) to ensure parents/carers have considered what is in the pupil's best interests.

We have a statutory duty to inform the local authority when a pupil is removed from our roll.

Where a child has an Education and Health Care plan the local authority will need to review the plan, working closely with parents and carers.

### **Intimate Care**

See also staff code of conduct

Intimate care includes any tasks that involve the dressing and undressing, washing including intimate parts, helping someone use the toilet, changing nappies or carrying out a procedure that requires direct or indirect contact to an intimate personal area.

Staff administering intimate care are required to record this using the agreed protocols laid out in our intimate care policy.

*The School uses the Swindon LSCB document Disabled Children and Young People Intimate Care Good Practice Guidance March 2014.*

*In addition, the procedures are in place at school and relevant Teaching Assistants are trained and aware of their responsibilities linked with personal care. These procedures are clearly located in the Personal Care rooms*

## Part 3 – Safeguarding Policy

### How is the information in this set of policy and procedures disseminated?

At the start of each school year The Safeguarding and Child Protection Policy is reviewed and revisited. Its contents are covered in whole school training and all members of staff are sent a copy, which they acknowledge they have both read and understood its contents.

Email updates, and midyear safeguarding training also reference the policy and its importance as the 'Go to' document for staff in school for Safeguarding.

1. Our staff induction programme includes a safeguarding section and new staff are asked to read the safeguarding policy and procedures. This also applies to governors.
2. Visitors, volunteers and external staff, including supply teachers, who visit our school are asked to read a visitors' code of conduct, which includes procedures for what to do if they have concerns about the safety of a pupil or concerns about the actions of an adult working/volunteering with children.
3. Our safeguarding policy and procedures are re-visited on an annual basis and time is set aside for staff to re-read the document. In order to check staff understanding of the content twilight session to read and a forms document to confirm reading and understanding

In addition to reading and understanding the school's safeguarding and child protection policy and procedures, staff are required to read:

- Keeping Children Safe In Education (Sept 23)  
*See appendix 6 for guidance about reading of KCSIE*
- the school's staff code of conduct
- the pupil behaviour policy
- the safeguarding response for children missing in education (included within our attendance policy)
- the school's online safety policy and acceptable use agreement

Staff are asked to sign to confirm their understanding and accept responsibility for following up any questions or queries they have arising from reading this document (with a member of our safeguarding team).

### How do we ensure parents and carers understand the school's role in safeguarding pupils?

1. This school is committed to helping parents/carers understand its responsibility for the welfare of all pupils and our duty of care. The policy and procedures are available to

parents and carers via the school website and a paper copy can be requested by contacting the school office.

2. The school website also provides access to a number of useful resources for parents and carers. These can be found in the 'Safeguarding' tab of the school's website.
3. During pupil induction meetings for parents and carers information will also be discussed about the school's safeguarding responsibilities.

## Roles and Responsibilities

The **Governing Body** have strategic leadership responsibility for safeguarding arrangements, ensuring that policies, procedures and training are effective and comply with the law (Part 2 KCSIE Sept 23). The Head teacher/Principal has a duty to ensure that the policies and procedures adopted by the governing body and proprietor are understood and followed by all staff.

- The Designated Safeguarding Lead (and Deputy DSL/s in the DSL's absence) works in line with Annex C of KCSIE and is a senior member of staff, from the leadership team. This role carries a significant level of responsibility. *See page 28 KCSIE for further detail.*
- Staff have a duty to respond to safeguarding and child protection concerns in line with the procedures laid out in this policy and in the statutory guidance – 'Keeping Children Safe In Education' Sept 2023. **'All staff have a duty to do what is reasonable in all circumstances to safeguard and promote the welfare of pupils and staff.'** (Teachers' Standards latest terminology update Dec 21)

**Governing bodies, proprietors, the head teacher and safeguarding team should work together to ensure they facilitate a whole school approach to safeguarding.** This means ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.

Where there is a safeguarding concern, governing bodies, proprietors and the leadership team should strive to ensure that the child's wishes and feelings are taken into account when determining what action to take and which services to provide.

Our safeguarding link governor at senior board level is *Jokie Bakker*.

The school completes an annual audit of safeguarding for the local authority, in partnership with the link safeguarding governor. This self-evaluation is quality assured with a visit from an independent consultant. Where weaknesses or areas for development are identified, the Governing Body monitors the implementation and impact of identified actions to address these issues. The Head teacher/Principal provides a safeguarding report *termly* as part of the Headteacher's/Principal's report to Governors during PAWS.

## Use of school premises

Where external organisations use the school premises, both within the school day and outside of school hours, the Governing Body has a responsibility to:-

\* seek assurance that the body concerned has appropriate policies and procedures in place in regard to safeguarding pupils. This includes checking that the organisation's safeguarding policy is fit for purpose and includes procedures for reporting concerns about adults who may work/volunteer with children.

\* ensure that the appropriate level of safer recruitment checks have been completed on staff working for the organisation

## Safer Recruitment Procedures

See Part 3 Page 52-86 KCSIE

This school works in line with Part 3 of Keeping Children Safe In Education (Sept 2023).

Checks completed on all staff and regular volunteers

- An enhanced DBS certificate, which includes barred list information, is required for any staff who will be engaging in regulated activity (working unsupervised with children). This is required for any staff employed since 2002. Prior to this staff were checked against List 99. Following completion of the DBS check, we require the individual to provide the original DBS certificate in person for checking, in addition to receiving the electronic confirmation from the service we use for the check.
- Identity checks are completed, together with proof of right to work in the UK
- Qualifications are checked
- If an individual has lived or worked outside of the UK an overseas police check / certificate of good conduct may be required (see page 74 KCSIE)
- Right to work checks are completed on all staff.

In addition, staff who have a teaching role will be checked, via the DfE Secure Access Website, for

- qualified teacher status
- prohibition check
- section 128 check (for any individual who has a managerial role, including Heads of Department, Governors and Trustees in academies)
- completion of induction
- teacher not subject to a conditional offer/suspension

## Online searches

See Page 55 Para. 221 KCSIE

An online search is completed for all short-listed candidates who apply to work in our school. A basic check is completed using Iris to identify any publicly available information of concern which:-

- could pose a safeguarding risk to children /young people
- cause damage the reputation of the school

Where information of concern is identified, this will be discussed with the candidate before a decision is made about suitability for the role being advertised. A record is made of the check and any subsequent actions required, along with the outcome.

## Visitors and externally employed staff

Where staff from external organisations are working with our pupils, we ensure that the letter of assurance received confirms that the relevant checks are in place, including a barred list check if the individual is working in regulated activity. Visitors are asked to provide proof of identity and if required, DBS information.

## Single Central Record

The school maintains an up to date single central record of all safer recruitment checks. This is in line with the requirements as set out in Keeping Children Safe In Education (Sept 23). See pages 71-72. The Head teacher monitors this record *at the start of each term of any changes or updates* and ensures it is in line with statutory requirements.

## Induction of new staff

Following appointment, the school offers new staff a programme of safeguarding and child protection induction. This includes:

Training with DSL Basic Safeguarding and Key Issues  
Hays Online Level 1 Safeguarding Training  
Channel Prevent Online Training  
Keeping Children Safe in Education Sec 1 (Sept 2021) or Annexe A  
School Safeguarding and Child Protection Policy and Procedures

## Online Safety

*See our school's Online Safety Policy*

*See also Pages 35-38 Part 2*

*See also 'Teaching Online Safety In Schools' (non-statutory guidance)*

Technology is a significant component in many safeguarding and well-being 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 abuse their peers online, this can take the form of abusive, harassing and misogynistic messages, the consensual and non-consensual sharing of indecent images and the sharing of abusive images and pornography, to those who do not want to receive such content.

## Responding to online safety concerns

Staff will follow our safeguarding procedures as outlined in Part 1 of this document. Staff should also be aware of the additional guidance in Part 2 under **child on child** abuse, where additional guidance is provided, in relation to responding to concerns about the sharing of indecent images via mobile devices.

## What are the school's responsibilities around online safety?

This school recognises:

- the increasing role technology has to play in education and children's daily lives
- the wide-range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks
- the importance of delivering a broad and relevant online safety curriculum which provides progression across year groups
- that delivery of this curriculum must be provided via regular lessons, which take place throughout each term
- the importance of keeping up to date with the tools, apps and devices children are using so that the curriculum which is offered is meaningful
- that online safety must be reflected in all relevant school policies
- it's responsibility to work in line with the Filtering and Monitoring standards.

## What our online safety curriculum offers

- Our online safety curriculum covers four aspects of risk – content, contact, conduct and commerce (see page 35-36 KCSIE for definitions)
- Key online safety messages (such as Childnet's SMART rules) which are reinforced at every opportunity across the curriculum, in assemblies, PSHE lessons
- Pupils are taught in all lessons to be critically aware of the materials and content they access on-line and understand that not everything they see online is true
- Pupils are supported in building resilience to radicalisation. A safe environment is provided for debating controversial issues and helping them to understand how they can influence and participate in decision-making.

## Filters and monitoring

- *The school maintains and supports the managed filtering service provided by SWGfL. The SWGfL service has been enhanced recently with User Based Filtering.*
- *The school has provided enhanced user-level filtering through the use of the Impero filtering programme. Impero blocks, logs and allows for remote monitoring.*

**See also:-**

**Pages 37-38 KCSIE for further information**

**Our Online safety policy**

**As part of the work we do to provide pupils/students with a safe environment in which to learn, we ensure that we have appropriate filtering and monitoring systems in place. Harmful and inappropriate content is blocked without unreasonably impacting on teaching and learning.**

**We work collaboratively to keep pupils/students safe in the online world.**

- **Governing bodies** have responsibility for ensuring the school has appropriate filtering and monitoring systems in place, taking into account the age of our pupils/students and those who are potentially at greater risk of harm. We have a named governor for filtering and monitoring in our school (see quick reference guide at front of policy).

- Senior leaders, including the DSL have an awareness and understanding of the systems in place. An annual review of online safety takes place, including review of filtering and monitoring systems. These systems are checked weekly
- Staff have an awareness of provisions in place and know how to respond when concerns are identified. Staff are provided with online safety training, at induction and at regular intervals.
- Within the four key areas of risk (Content, Contact, Conduct and Commerce), pupils/students are taught about the steps they should take if they identify illegal, inappropriate or harmful content online.

### Use of mobile technology

*Only students in sixth form and staff can connect to the school wifi network, by using the Bring Your Own Device scheme (BYOD).*

*Year 11 may have an access to wifi that allows them to use GCSE POD and Pixl apps for GCSE revision*

*There is basic filtering service provided by SWGfL as there is no user based filtering on devices that are not owned by the school – this is not limited to mobiles phones for C6, this could be laptops, tablets, etc that are owned by the student or member of staff.*

*Mobile phones should not be used around the school building unless a member of staff has given their express permission to use them as part of teaching and learning.*

*The school has no control over what students can access using their own data plans on smartphones.*

### Use of technology during partial school closure/lockdowns.

This school recognises:

- the increasing role technology has to play in education and children's daily lives, and the increased use during times of lockdown due to Covid
- the wide-range of content which is available to children via the internet
- that alongside the benefits of technology, there are also risks

For those who are not physically attending school during partial school closure, we recognise that these pupils will be spending increased time online, either participating in school work, taking part in live streaming of lessons and/or as part of extended 'free-time' due to lockdown procedures in place nationally.

We recognise that this will pose increased risk to children, including:-

- Grooming
- Exploitation, both criminal and sexual
- Radicalisation
- Peer on peer abuse, including cyber-bullying
- Sexual harassment

All staff who interact with pupils/students, including remote interactions, will continue to be vigilant and look out for signs that a child's safety and welfare might be at risk. Further guidance to keep pupils/students and staff safe when working remotely can be found in the [Safer Working Practice](#) (Updated February 2022)



In addition, pupils are sign-posted to age appropriate practical support should they have worries or concerns whilst online. Links to support are available via our school website and include:-

[UK Safer Internet Centre Hotline](#)

[Child Exploitation and Online Protection Centre](#)

[Parentzone](#)

### **Safeguarding Supervision**

All staff working in this school have a responsibility to safeguard the children in their care. Staff can only achieve this effectively if they:-

- are clear about what is expected of them
- have the skills, knowledge, behaviours, values and attitudes to carry out their role
- are fully supported in their role and managed effectively

Safeguarding supervision is available for any member of staff as required. Members of the safeguarding team receive planned safeguarding supervision *The DSL completes termly supervision with the Chair of Governors and notes are recorded. The DSL also has supervision fortnightly with the Head. The DDSL and DSL meet weekly or fortnightly for supervision. Informal supervision as part of day-to-day work happens between the Safeguarding Team and other members of staff in school as issues occur.*

### **Whistle-blowing**

This school expects the highest standards of conduct from all employees and governors and will treat seriously any concern raised about illegal or improper conduct. The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- a criminal offence
- a miscarriage of justice
- an act creating risk to health and safety
- an act causing damage to the environment
- a breach of any legal obligation
- a concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed, a reasonable belief is sufficient. The employee has no responsibility for investigating the matter; it is the school's responsibility to ensure that an investigation takes place.

Staff and volunteers are encouraged to raise concerns about poor or unsafe practice and potential failings in the school's safeguarding regime via:

- the staff handbook
- the staff code of conduct

- the visitor's/volunteer's code of conduct

In the first instance, unless the employee reasonably believes their Head teacher to be involved in the wrongdoing, any concerns should be raised with the employee's Head teacher. If he/she believes the Head teacher to be involved, then the employee should proceed straight to the Chair of Governors.

Where a member of staff feels unable to raise a concern with either of the individuals identified above the [NSPCC whistle-blowing](#) helpline is available to them.

### Training for Adults Working in Our School

We are committed to ensuring staff and volunteers know and understand:-

- the signs and symptoms of abuse;
- how to identify pupils who may benefit from early help;
- their responsibility for referring concerns to the designated safeguarding lead / deputy;
- the procedures for reporting safeguarding /child protection concerns about adults working with children (allegations)

### Formal training

Safeguarding and child protection training and online safety training is provided on a regular basis to all staff *at least annually* to enable them to carry out these requirements. Safeguarding and child protection training includes the possible signs and indicators of abuse and how to respond effectively.

Governors are provided with strategic safeguarding training at induction and as subsequent updates. This training includes a focus on the safeguarding roles and responsibilities of all governors/trustees and equips them to provide strategic challenge to test and assure themselves that safeguarding policies and procedures are effective

Regular volunteers and visiting staff, including Governors, 1:1 Tutors and Exam Invigilators complete Hays Level 1 Online training, and get a briefing annually from DSL

### Updates

In addition to formal training, all staff receive regular opportunity to update their knowledge and understanding.

These updates can include a rolling focus on:

- Child on Child abuse, including sexual violence and harassment
- Early Help
- Trauma and adversity
- Radicalisation and the Prevent Duty
- Honour-based abuse, including Female Genital Mutilation
- Exploitation, including child criminal exploitation and child sexual exploitation
- Child mental health

- Parent mental health
- Domestic abuse
- Online safety, including filtering and monitoring
- Forced marriage and honour-based violence
- Child-trafficking
- Children missing education and children absent from education

These are delivered by *DSL at staff briefings, pre recorded powerpoint trainings and email updates or quick read documents*

These happen at least annually.

### Additional training for Designated Safeguarding Leads and deputy DSLs

The statutory requirement for DSLs and deputy DSLs is to renew training every 2 years. We work in line with this requirement.

Our deputy DSL has completed advanced training to the same level as the DSL, in line with the requirements of our Local Authority.

In addition, the members of our safeguarding team complete:

- \* FGM training
- \* Prevent training in line with statutory requirements
- \* Youth Mental Health First Aider

### Appendix 1

This policy and set of procedures works in line with the following legislation, statutory guidance and non- statutory guidance:

#### Legislation

- Section 175 Education Act 2002 - Maintained schools and FE colleges including sixth forms
- The Education Regulations (Independent School Standards) 2014 - Independent schools including academies and free schools
- The non-maintained special schools Regulations 2015 (England)
- The Education and Training (welfare of Children) Act 2021

#### Statutory Guidance

- Keeping Children Safe In Education (DfE Sept 2023)
- Working Together To Safeguard Children (DfE July 2018) – currently under review, new link to follow shortly
- Working Together To Improve Attendance (April 2023)
- Multi-agency statutory guidance on Female Genital Mutilation (July 2020)
- The Early Years' Framework (September 2021)

- [Relationships Education, Relationships and Sex Education and Health Education](#)
- [Filtering and Monitoring Standards for schools and colleges](#) (March 2023)

### Non-statutory Guidance

- [What to do if you are worried a child is being abused \(DfE March 2015\) - \(non-statutory guidance\)](#)
- [Working Together To Improve School Attendance](#) (Sept 2023)
- [The Prevent Duty Guidance – revised April 21](#)
- [The Prevent Duty - Departmental advice for schools and childcare providers \(DfE June 15\)](#)
- [Information-sharing: advice for practitioners providing safeguarding services \(DfE July 218\)](#)
- [Children Missing Education \(Sept 16\)](#)
- [Teaching Online Safety In School](#) (Jan 23)
- [Safer Working Practice Guidance For Adults Working With Children and Young People](#) (Feb 22)
- [Behaviour and Discipline in Schools](#) (Sept 22)
- [Mental health and Behaviour In Schools](#) (Nov 2018)
- [Searching, screening and confiscation](#) (July 22)

In addition, the school takes into account:-

- Regional guidance
- the procedures and practice of the local authority

### Appendix 2 – Definitions of Abuse (taken from Keeping Children Safe in Education 2023)

#### Physical Abuse

A form of abuse which 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.

#### Neglect

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, clothing and shelter (including exclusion from home or abandonment);
- protect a child from physical and emotional harm or danger;
- ensure adequate supervision (including the use of inadequate care-givers); or
- ensure access to appropriate medical care or treatment.

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

### **Emotional Abuse**

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 a child 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 a 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 cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone."

### **Sexual Abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving 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.

Appendix 3  
Safeguarding and Child Protection  
Concern / Incident Form  
CONFIDENTIAL

|   |  |   |  |
|---|--|---|--|
| Date:   |  | Name and role of person completing form |  |
| Time:   |  | Date and time read by DSL / Deputy DSL  |  |
| Name of pupil:  |  | DOB:                                    |  |
| Location (if applicable)  |  |   |  |
| <u>What have I seen/heard/noticed which concerns me?</u>                |  |   |  |
|   |  |   |  |
| <u>What am I worried about?</u>   |  |   |  |
|   |  |   |  |
| <u>Is this concern linked to any previous concerns I have reported?</u> |  |   |  |
|   |  |   |  |
| <u>Action I have taken</u>  |  |   |  |
|   |  |   |  |

|   |  |
|---|--|
| <p><b>To be completed by a member of the safeguarding team</b></p> <p><i>Include reference here to other members of the safeguarding team you may have discussed the case with</i></p> <p><b>Discussion of next steps agreed with:-</b></p><br><br><br><br><br><p>Record of discussion with another professional, external to the school (giving full name/ role and agency)</p>  |  |
| <p><b>Detail of decision / action agreed by DSL or deputy:</b></p><br><br><br><br><p>Has the local authority threshold guidance been referred to at this point?      Yes / No</p> <p>Has the person who reported the initial concern been provided with feedback? Yes / No</p>  |  |
| <p><b>Reason(s) for this decision or action by DSL or deputy:</b></p> <p><i>Does the pupil need to be monitored? Yes/No</i></p> <p><i>If yes, when will the case be reviewed?</i></p><br><br><br><p><i>Is Early Help support appropriate? Yes / No</i></p> <p><u><i>Reason for decision</i></u></p><br><br><br><p><i>Is a referral to children's social care required? Yes/No</i></p> <p><i>Does the school have evidence that the threshold for significant harm has been met? (child protection)</i></p> <p><i>Yes/No</i></p> <p><i>Reason for decision</i></p> |  |
| <p><b>Tick to confirm added to pupil's chronology and copy placed on file</b></p>   |  |

Appendix 4  
Prompt sheet  
Safeguarding and Child Protection  
Prompt sheet

This form is intended to be used, alongside the concern/incident form, to support staff with the recording of safeguarding and child protection concerns/incidents.

Have you remembered to include:

1. **what is it that you have seen/heard/noticed which concerns you?**  
Remember if you have noticed a mark on the pupil, it is really important to complete an attached body map, giving an indication of the shape, size and location of the mark.  
  
Has the child communicated that something is wrong? Verbally? Change in behaviour?
2. **clear and factual information about what you have seen/heard/noticed?**  
If you have included your opinion in your report, have you made it clear that this is your opinion?
3. **full names of those involved and where possible, reference to staff roles?**
4. **why what you have seen/heard/noticed concerns you?**  
What are worried will happen if this concern/incident is not responded to?
5. **any actions you have already taken?**
6. **whether you have spoken to parents/carers about the concern/incident?**  
Remember, you may need to seek advice from a member of the safeguarding team if you are unsure about whether speaking to the parent may increase the risk to the pupil. If the parent is the alleged perpetrator you must always seek advice from the safeguarding team before speaking to the parent/carer.



Appendix 5 -  
 Low Level Concerns / Allegations Record  
 Adult working or volunteering with children/young people  
 CONFIDENTIAL

|  |  |                  |  |
|--|--|------------------|--|
| Name of adult at centre of concern/allegation  |  | Role             |  |
| Name of person completing form   |  | Role             |  |
| Date of concern/allegation   |  | Date record made |  |
| Name of child /children involved if applicable:  |  |                  |  |
| Has concern/allegation arisen during the adult's time on school site or outside of school? |  |                  |  |
| <u>Details of the concern/ allegation</u>  |  |                  |  |
|  |  |                  |  |
| Is the adult aware of the concern/allegation?  |  |                  |  |
|  |  |                  |  |
| Action taken by person(s) completing the form:   |  |                  |  |
|  |  |                  |  |

|   |
|---|
| Who has the concern/allegation been shared with? DSL / Head teacher/Chair of Governors  |
| To be completed by the Head teacher/ Chair of Governors   |
| <p>Does the information provided suggest that the adult has:</p> <ul style="list-style-type: none"> <li>• behaved in a way that has harmed a child, or may have harmed a child;</li> <li>• possibly committed a criminal offence against or relating to a child;</li> <li>• behaved towards a child or children in a way that indicates that he/she may pose a risk of harm to children</li> <li>• behaved or may have behaved in a way that indicates they may not be suitable to work with children.</li> <li>• <b>has the LADO/DOFA been contacted? Yes/No</b><br/>If yes has a local authority referral form been completed and submitted?</li> <li>• <b>has advice been taken from any other professionals? Yes / No</b></li> </ul> <p><i>Include details of professionals spoken to</i></p> |
| <p><b>Details of decisions and actions taken</b></p> <p><i>Include here details of</i></p> <ul style="list-style-type: none"> <li>• <i>strategy discussion</i></li> <li>• <i>allegations management meeting</i></li> <li>• <i>no involvement by LADO/DOFA – low level concern to be dealt with internally</i></li> <li>• <i>disciplinary procedures</i></li> <li>• <i>no further action</i></li> </ul> <p><i>as applicable</i></p>  |
| <p><b>Include here any safeguards which have been put in place in response to the report</b></p> <p><i>Include here details of</i></p> <ul style="list-style-type: none"> <li>• <i>additional adult supervision implemented</i></li> <li>• <i>risk assessment required</i></li> <li>• <i>additional staff training required</i></li> <li>• <i>duties away from children</i></li> <li>• <i>suspension during investigation</i></li> </ul>  |
| <p><b>If a child or children has been involved, have parents/carers been informed?</b></p> <p>Yes / No</p> <p>If Yes, what action would they like to see?</p>   |

## Appendix 6

|   |   |
|---|---|
| Staff who do not come into direct contact with children | <ul style="list-style-type: none"> <li>• Part 1 or Annex A – KCSIE</li> </ul>   |
| Staff who have direct contact with children             | <ul style="list-style-type: none"> <li>• Part 1 KCSIE</li> <li>• Sexual Violence and sexual harassment between children in schools and colleges (Sept 21)</li> <li>• Annex B,C and D</li> </ul> |
| Head teachers, Principals and DSLs                      | <ul style="list-style-type: none"> <li>• Working Together To Safeguard Children (July 2018)</li> <li>• KCSIE – whole document</li> </ul>  |
| Staff with a lead for behaviour                         | <ul style="list-style-type: none"> <li>• Part 1 and Part 5 of KCSIE as well as Annex B, C and D</li> </ul>  |
| Staff involved in recruitment                           | <ul style="list-style-type: none"> <li>• Part 1</li> <li>• Part 3 KCSIE</li> <li>• Annex B and F</li> </ul>   |
| HR staff  | <ul style="list-style-type: none"> <li>• Part 1</li> <li>• Part 3</li> <li>• Part 4 KCSIE</li> <li>• Annex B and F</li> </ul>   |
| Staff who have responsibility for IT and online safety  | <ul style="list-style-type: none"> <li>• Part 1</li> <li>• Part 2 KCSIE</li> <li>• Annex A and C</li> </ul>   |
| Governors and proprietors                               | <ul style="list-style-type: none"> <li>• KCSIE – whole document</li> </ul>  |

## Appendix 7

### Identifying support for pupils during partial school closure/lockdowns

The school's safeguarding team and senior leaders review all pupils on the school's safeguarding and child protection overview.

A risk assessment is completed to identify a graduated offer of support for these pupils and any additional pupils whose welfare and safety may be at risk as a result of the partial closure of school, but who may previously not have been on the school's safeguarding overview.

### Arrangements to support vulnerable pupils

Vulnerable children include children who are supported by social care, those with safeguarding and welfare needs, including child in need plans, on child protection plans, 'looked after' children, young carers, disabled children and those with education, health and care (EHC) plans, although many pupils/students on EHCPs can remain safely at home.

Arrangements will be made for these pupils who are classed as Vulnerable or keyworker to continue attending school. **We also have the flexibility to offer a place in school for any pupil who we believe to be on the edge of receiving children's social care support.**

Support for these pupils includes:

- Regular communication with and agreed support from a key member of staff (student support team, Safeguarding team or SEN team or sometimes tutor)
- Continued involvement with Children's Services and other external professionals as part of review cycle eg Child protection conference involvement and core group reviews. These will take place in line with local safeguarding partners' advice.
- Sign-posting respite available for families with children who have special educational needs and disabilities

Where pupils who are deemed vulnerable are not attending school, the following safeguards have been put in place to support, in addition to the points above:

- Doorstep safe and well checks *if no contact is made via email or calls*
- Lead professional/social worker/Virtual Headteacher made aware of non-attendance at school and additional support from these professionals agreed
- Telephone contact *weekly or fortnightly as determined by risk rag*
- System in place for pupils to alert safeguarding team if at risk *Staff continue to record on cpoms*
- Links to support available made available on school website

### Arrangements to support pupils we are concerned about but who do not meet the 'vulnerable' definition

In addition to those pupils identified as vulnerable, we are aware of the following groups who may be at increased risk during this time.

#### Pupils who are living in households where there is domestic abuse

Support includes:

- Telephone contact *as above*
- Links to support available on school website, including contact numbers for [National Domestic Abuse Helpline](#)

- Ensuring victims are aware of the Government advice that they are able to leave their house to seek refuge if their safety is at risk
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

#### Pupils who have mental health issues, including anxiety and depression

Support includes:

- Teacher/tutor contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- Support from the school's pastoral team
- Links to support available on school website, including [Young Minds](#) and [Childline](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

#### Pupils who are at risk of peer on peer abuse, including cyber-bullying

Support includes:

- Teacher/tutor contact with pupils to check on well-being via school email systems or virtual learning environments. Staff aware of safeguarding procedures to follow if they have concerns about a pupil welfare
- System in place for pupils to alert safeguarding team if at risk **using cpoms**
- Safety plan written with parents/carers to support pupils during time at home
- Links to support available on school website, including resources for parents to access to keep their children safe online eg [Kidscape](#)
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

#### Pupils who are at risk of being left at home unsupervised

- Clear communication with parents/carers about the importance of keeping their children safe whilst they are at home, including appropriate supervision, both in the 'real world' and online
- System in place for pupils to alert safeguarding team if at risk **cpoms**
- Regular review to monitor whether risk is increasing by pupil remaining at home and provision of school place if required

**There is a covid lockdown closure annexe policy that can also be referred to**

Signed: *Mr Charles Drew* (Head teacher)

Date:

Signed: *Dr Jodie Bakker* (Chair of Governors)

Date: