

# Broadwaters Inclusive Learning Community (BILC)



## Safeguarding and Child Protection Policy and Procedures Updated for KCSIE September 2023

Policy Originators	Dawn Ferdinand and Maureen Duncan
Governor Responsible	Marilyn Francis
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Signed	

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This policy is reviewed annually by the designated safeguarding leads and ratified by the governing body. All staff read and agree to the policy during their induction. At this time and when updates occur they also read and sign Keeping children safe in education Part 1. Families are encouraged to be familiar with this policy via the school website. Copies of this policy and its associated documents are available from the school office.

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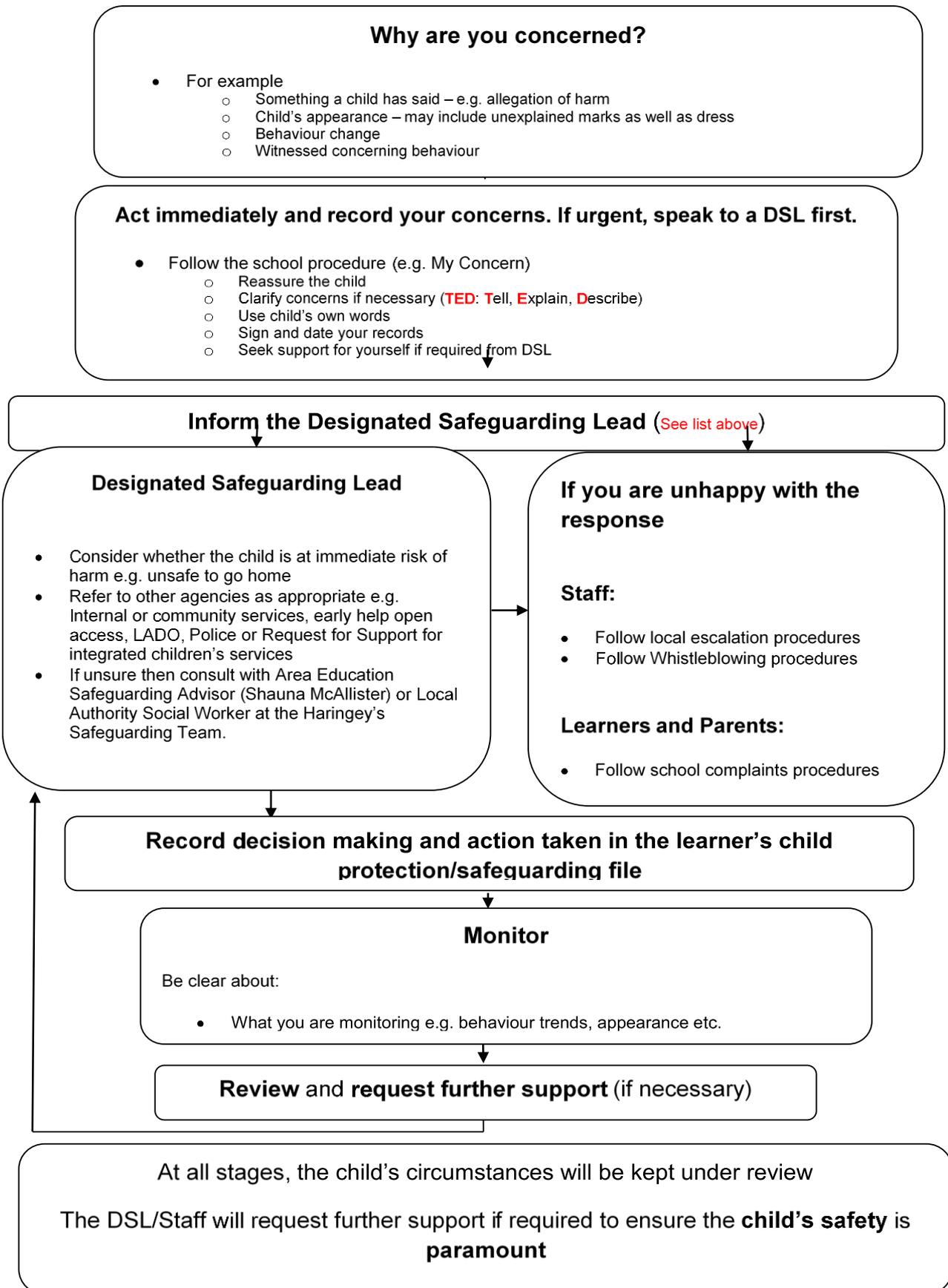
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**1. Key Contacts**

<b>The Willow Primary School and Broadwaters Children Centre</b>		
Designated Child Protection Lead	Dawn Ferdinand	
Deputy Designated Child Protection Lead	School –Sarah Harris, Umarani Nathan CC – Cherri Fox and Alison Walmsley	
Nominated Child Protection Governor	Marilyn Francis	
Head Teacher	Dawn Ferdinand	
Safer recruitment trained staff	Dawn Ferdinand, Sarah Harris, Umarani Nathan, Cherri Fox, Alison Walmsley, Marilyn Francis (Gov)	
<b>The Brook Special Primary School</b>		
Designated Child Protection Lead	Maureen Duncan	
Deputy Designated Child Protection Leads	Sukina Campos, Ed Putman, Felicia Rock	
School Nurse Designated Lead for Health	Ngenda Katompa (known as Elizabeth)	
Nominated Child Protection Governor	Marilyn Francis	
Head Teacher	Maureen Duncan	
Safer recruitment trained staff	Maureen Duncan, Sukina Campos, Edward Putman, Felicia Rock, Carlos Teixeira, Thibaut de Wolf, Marilyn Francis, Lowri Banfield	
<b>Haringey Local Authority CONTACTS</b>		
<b>Local Authority Designated Officer (LADO)</b>	Shauna McAllister / John Srivastava	Finola Owens LADO Manager Sharon Ackbersingh LADO <a href="mailto:LADO@haringey.gov.uk">LADO@haringey.gov.uk</a> 020 8489 2968/1186
<b>Channel Helpline</b>		020 7340 7264
Haringey Local Safeguarding Children Board		8th floor, River Park House, 225, High Road, London N22 8HQ <a href="https://haringeyscp.org.uk/">https://haringeyscp.org.uk/</a> 020 8489 3145

<p><b>NSPCC Helpline</b></p>		<ul style="list-style-type: none"> <li>• 080 8800 5000</li> <li>• <a href="https://forms.nspcc.org.uk/content/nspcc---report-abuse-form">https://forms.nspcc.org.uk/content/nspcc---report-abuse-form</a></li> </ul>
<p><b>Haringey Council's Children's Services</b> Please only use the out of hours number if you are calling outside of normal working hours. Your call will be logged and the operator will take brief details. An out of hours social worker will ring you back.</p>		<p>All members of staff in BILC are made aware of local support available.</p> <ul style="list-style-type: none"> <li>• <b>Haringey's Multi-Agency Safeguarding Hub (MASH).</b></li> <li>• Monday to Thursday 8:45 am to 5:00pm; Friday 8:45 am to 4:45 pm <b>020 8489 4470</b></li> <li>• Out of office hours, including weekends: <b>020 8489 0000</b></li> <li>• <b>Do not use this number if a child needs immediate assistance from the Police or Ambulance Services. In these cases, call 999</b></li> <li>• <b>Integrated Children's Services</b> <ul style="list-style-type: none"> <li>○ Haringey's Safeguarding Team</li> </ul> </li> <li>• <b>Met Police</b> <ul style="list-style-type: none"> <li>○ 101 or 999 if there is an immediate risk of harm</li> </ul> </li> <li>• <b>Haringey Safeguarding Children Multi-Agency Partnership (Haringey LA)</b></li> <li>• <b>Adult Safeguarding</b> <ul style="list-style-type: none"> <li>○ Adult Social Care</li> </ul> </li> <li>•</li> </ul>
<p><b>Making a MASH referral</b></p>		<ul style="list-style-type: none"> <li>• During your phone call (above) if you are a professional working with children you may be asked to complete a <b>MASH referral form</b> within 24 hours. This should be emailed securely to <a href="mailto:mashreferral@Haringey.gcsx.gov.uk">mashreferral@Haringey.gcsx.gov.uk</a></li> </ul>

## 2. What to do if you have a welfare concern in the BILC



### **3. Introduction and Ethos**

- **The purpose of this policy is:**
  - To protect the safety, welfare and well-being of the pupils on roll at our school
  - To set out the school's overarching principles, approaches and systems to child protection and safeguarding across all aspects of school life.
  - To ensure staff are aware of their statutory safeguarding duties and responsibilities
  - To ensure staff are well-equipped and confident to recognise and report child protection concerns
  - To promote an open and listening culture where everyone can voice concerns in the knowledge they will be believed, helped and supported.
- **Our core safeguarding principles are:**
  - **Promotion**
    - making sure pupils, parents, staff and all adults that come into contact with children know the systems and the support in place to keep children safe and there is a culture of vigilance permeating across the school
  - **Prevention**
    - positive, supportive, vigilant, open and safe culture. Well taught curriculum that includes relationships and online safety, pastoral opportunities for children and safer recruitment procedures
  - **Protection**
    - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
  - **Support**
    - for all learners, parents and staff, and where appropriate specific interventions that are required for those who may be at risk of harm.
  - **Working with parents and other agencies**
    - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- BILC recognise our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- Staff and other adults working with children at BILC are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- BILC believe that the best interests of children always come first. All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- BILC recognises the importance of safeguarding and the promotion of children's welfare at all times. Safeguarding is embedded in all the school's processes and procedures and at the heart of our school to provide an ethos and environment that will help children to be safe and feel safe. In our school children are respected and encouraged to talk openly. All our staff understand safe professional practice and adhere to our safeguarding policies.
- BILC expects that if any member of our community has a safeguarding concern about any child or adult, they should act immediately. This includes out of hours when the DSL may not be available to speak to, in which case a direct referral should be made to social services – see contact details at the start of this policy.
- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2023 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- The procedures contained in this policy apply to all staff, including governors, temporary or third-party agency staff and volunteers and are consistent with those outlined within KCSIE 2022.

#### 4. Legislation and guidance

- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes:
  - DfE Keeping Children Safe in Education 2022 (KCSIE)
  - Working Together to Safeguard Children 2018 (last updated 1 July 2022) (WTSC)
  - Ofsted: Education Inspection Framework' 2019 (revised June 2021)
  - Framework for the Assessment of Children in Need and their Families 2000)
  - Early Years and Foundation Stage Framework (EYFS) September 2021
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - Multi-agency statutory guidance on female genital mutilation (July 2020)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- Other legislation this policy is based on:

Legislation	What it covers
School Staffing (England) Regulations 2009	<ul style="list-style-type: none"> <li>Lists what must be recorded on the single central record</li> <li>The requirement for at least one person conducting an interview to be trained in safer recruitment techniques.</li> </ul>
Children's Act 1989 (and 2004 amendment),	<ul style="list-style-type: none"> <li>Provides the framework for the care and protection of children.</li> </ul>
Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015 (Section 5B(11))	<ul style="list-style-type: none"> <li>Places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.</li> </ul>
The Marriage and Civil Partnership (Minimum Age) Act 2022	<ul style="list-style-type: none"> <li>Officially came into force on 27 February</li> <li>The Act prohibits 16 and 17 year olds from marrying or entering into a civil partnership, regardless of whether they have parental consent</li> <li>Also an offence to cause a child to marry before 18<sup>th</sup> birthday also applies to non binding unofficial marriageclarity</li> </ul>
Rehabilitation of Offenders Act 1974	<ul style="list-style-type: none"> <li>Sets out when people with criminal convictions can work with children.</li> </ul>
Schedule 4 of the Safeguarding Vulnerable Groups Act 2006	<ul style="list-style-type: none"> <li>Defines what 'regulated activity' is in relation to children</li> </ul>

#### 5. Human Rights, Equalities and Public Sector Equality Duty

- BILC is aware of its obligations under the Human Rights Act 1998 (HRA), Equality Act 2010 (including its Public Sector Equality Duty) and the local multi-agency safeguarding arrangements in Haringey and other local authorities that pupils may reside in.
- The Governing body and senior leaders recognise that, under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:
  - Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
  - Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
  - Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination, and
  - Protocol 1, Article 2: protects the right to education.
- The Governing body and senior leaders recognise being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

- The Governing body and senior leaders will adhere to the Equality Act, will not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).
- The Governing body and senior leaders will pay due regard to the need to eliminate unlawful discrimination, harassment and victimisation (and any other conduct prohibited under the Equality Act), to advance equality of opportunity and foster good relations between those who share a relevant protected characteristic and those who do not. The duty applies to all protected characteristics and means that whenever significant decisions are being made or policies developed, the Governing body and senior leaders will give specific consideration to the equality implications of these such as, for example, the need to eliminate unlawful behaviours that relate to them such as sexual violence and sexual harassment, misogyny/misandry and racism.

## **6. Related Safeguarding Policies**

- This policy is one of an integrated suite of policies, reflecting the whole school approach to safeguarding. It should be read and actioned in conjunction with the policies as listed below:
  - Attendance and punctuality
  - Behaviour management Curriculum policy
  - Data protection and Information sharing
  - First aid and managing medical needs
  - Health and safety
  - Image use
  - Managing/dealing with allegations against staff,
  - Online safety policy including clarity in the leadership of online safety, Acceptable Use of Technology Policies (AUP), filtering and monitoring, opportunities to teach about online safety.
  - Child on-Child abuse policy, including sexual violence and sexual harassment and anti-bullying strategy
  - Personal and intimate care
  - Personal, social and health education (PSHE), may cover wider opportunities to teaching about safeguarding
  - Relationships and Sex Education (RSE)
  - Risk assessments (e.g. school trips, use of technology)
  - Safer recruitment
  - Searching, screening and confiscation:
  - Social media and Mobile technology
  - Special educational needs
  - Staff behaviour policy or Code of Conduct
  - Staff disciplinary policy
  - Use of physical restraint
  - Whistleblowing

## **7. Definitions of safeguarding**

- In line with KCSIE 2023, 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.
- Safeguarding is what we do to prevent children suffering or coming to harm.
- Child protection refers to activities undertaken by the school to protect children suffering from harm or likely to suffer from harm. A child includes anyone under the age of 18.
- The safeguarding partners that the school works with to safeguard its pupils as set out in KCSIE are: the local authority; the local clinical commissioning group; and the chief officer of Police for the area that falls under the local authority.
- Abuse is a form of maltreatment of a child that covers inflicting harm or failing to prevent the infliction of harm. Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and

psychological needs. *Section 8 and Appendix 1 provides a more detailed explanation of the different types of abuse and signs and symptoms and specific safeguarding issues.*

- KCSIE 2022 notes the use of the following widely recognised and understood terms ‘victim’ and ‘alleged perpetrator(s)’ and where appropriate ‘perpetrator(s)’.

At BILC we recognise that not everyone who has been subjected to abuse considers themselves a victim or would want to be described in this way. We also think carefully about the use of the term ‘**alleged perpetrator(s)**’ and where appropriate ‘**perpetrator(s)**’, especially when speaking in front of children, not least because in some cases the abusive behaviour will have been harmful to the perpetrator as well. In managing any incident, we are prepared to use any term with which the individual child is most comfortable and on a case-by-case basis.

## **8. Informing staff and others of safeguarding policy**

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy. They will be asked to say they have read and understood its contents, are familiar with the school systems and will adhere to them. This policy can be found on the school shared drive: Staff Resources, Broadwaters, BILC policies and is also available on the schools’ websites.
- Visitors to the school site will be given a leaflet detailing our safeguarding arrangements, which also covers fire safety, first aid and health & safety. Visitors will be asked to sign to say they have read, understood and will adhere to these arrangements.
- Parents/carers can obtain a copy of the BILC Safeguarding and Child Protection Policy downloaded from the school website together with other related policies, including for online safety, recruitment and child-on-child abuse. <http://www.broadwaters.haringey.sch.uk/> Additionally, these and other policies are available from the school office on request.
- Pupils will be made aware of the school’s systems in age-appropriate ways through displays around the school site, verbally and via the school website. The DSL will ensure pupils have understood and are aware that they can raise concerns at any time, they will be listened to, taken seriously and their wishes respected (where possible), given the necessary support and kept informed of actions being taken.

## **9. Roles and Responsibilities**

### **The Governing Body**

- The Governing Body takes responsibility for strategic leadership that is a ‘whole school approach’ for the school’s safeguarding arrangements and that these will comply with their duties under legislation and have full regard to KCSIE 2023. This includes ensuring the school’s policies, procedures and training are effective and comply with the law at all times.
- The Governing body will ensure the school’s systems enable pupils to report what is happening to them.
- The Governing body will ensure the appointed DSL is a senior member of staff. The role of the DSL (and deputies) set out in KCSIE Annex C summarised in the section below and will be made explicit in the postholder’s job description.
- The BILC has a nominated governor for safeguarding. The nominated governor will support the Designated Safeguarding Lead and have oversight in ensuring that the BILC has an effective policy which interlinks with other related policies; that locally agreed procedures are in place and being followed; and that the policies are reviewed at least annually and when required.
- All governors will undertake safeguarding training and additional training on specific issues, such as online safety and Prevent. This will be part of ongoing and regular programme of training to build knowledge and understanding of safeguarding across all members of the Governing Body.
- The Governing Body will take an active role in monitoring safeguarding arrangements and providing support to the Designated Safeguarding Lead in line with Part 2 KCSIE 2023. This will include visits to school, regular contact with the Designated Safeguarding Lead and other staff working to protect children and reviewing information provided to them concerning pupils’ welfare and safety, including for online safety. Governors will also seek the views of pupils and parents/carers as part of their monitoring arrangements to check on the effectiveness of safeguarding arrangements.
- The Governing Body and leadership team at BILC recognises the significant level of responsibility of the Designated Safeguarding Lead role. They will ensure the postholder (and any deputies) are given the

additional time, funding, training, resources, and support needed to carry out the role effectively. They will also ensure there is adequate cover if the Designated Safeguarding Lead is absent.

### **Headteacher**

- The Headteacher/Principal will ensure that the suite of policies and procedures relating to safeguarding and child protection adopted by the school's Governing Body are understood and followed by all staff.

### **Designated Safeguarding Lead (DSL)**

- BILC has appointed members of the leadership teams as the Designated Safeguarding Lead (DSL). Additionally, the BILC has appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence. These staff members are members of the Senior Leadership Team and also children and Families' Officers.
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems in BILC. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated. This is in line with full job description set out in KCSIE Annex C.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs are trained to the same standard as the DSL. The DSL and any deputy DSLs training will be updated formally every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.
- The DSL will provide advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings and/or supporting other staff to do so and contributing to the assessment of children.
- The Headteachers will be kept informed of any significant issues by the DSL and Deputy DSLs.
- During term time the DSL (or a deputy) will always be available (during school/office hours) for staff in the school to discuss any safeguarding concerns. This will be in person, in very exceptional circumstances this may be by telephone. The school will inform parents of out of hours reporting arrangement and cover arrangements for out of hours/out of term activities..

- **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required,
- where a crime may have been committed to the Police as required. NPCC - When to call the police should help understand when to consider calling the police and what to expect when working with the police.

- **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and special educational needs co-ordinators (SENCO's), or the named person with oversight for SEND in a college and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically

- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college<sup>154</sup>. This includes:
- ensuring that the school knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort,
- supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

- **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. Concerns and referrals are kept in a separate child protection file for each child. Records will include:

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

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in section XX of this policy.

Where children leave the school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO's) are aware as required.

In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school.

- **Raising awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

- **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) will also undertake Prevent awareness training. Training will provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

- **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

- **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school may put in place to protect them
- understand the importance of information sharing, both within the school, and with other schools on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

### **Members of staff**

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - Be aware it can happen here and safeguarding is everyone's responsibility.
  - Build trusted relationships with children and young people that facilitates communication.
  - Actively promote welfare and safeguarding, including online safety, of pupils.

- Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
- Understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.
- Be aware of indicators of abuse and neglect and understand that children can be at risk of harm inside and outside of the school, inside and outside of home and online.
- Exercise professional curiosity and know that what to look for is vital for the early identification of abuse and neglect to identify cases of children who may be in need of help or protection.
- Reassure a child that they are being taken seriously and that they will be supported and kept safe; they will never give the child the impression that they are creating a problem by reporting **any** form of abuse and/or neglect; and will never make a child feel ashamed for making a report.
- Be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child.
- Understand the early help process and their role in it.
- Understand the school's safeguarding policies and systems.
- Undertake regular and appropriate training which is regularly updated.
- Be aware of the process of making referrals to children's social care and statutory assessment under the Children Act 1989.
- Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
- Know how to maintain an appropriate level of confidentiality and the importance of recording and information sharing.
- Understand the wider definitions of child-on-child abuse and be aware of specific issues such as cyberbullying, sexual violence, sexual harassment and exploitation as set out in KCSIE Part 2 (and Annex A and Annex B).
- Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
- Be aware of the school's child-on-child abuse policy, anti-bullying strategy and the role they play in preventing and responding to child-on-child abuse.

### **Children and Young People**

- Children and young people (learners) have a right to:
  - Feel safe, be listened to, know their concerns will be taken seriously, and have their wishes and feelings taken into account.
  - Contribute to the development of BILC safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

### **Parents and Carers**

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant BILC policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm including online and seek help and support from the BILC or other agencies.
  - Speak to school staff if they have any concerns about the welfare, well-being and safety of their children.

## **10. Recognising Indicators of abuse and neglect**

- All staff at BILC are made aware of the definitions and indicators of abuse and neglect (see below), as identified by Working Together to Safeguard Children (2018; updated 1 July 2022) and Keeping Children Safe in Education (KCSIE) 2023.
- **All** staff understand that children can be at risk of harm inside and outside of the school/college, inside and outside of home and online.

- Harm can also include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.
- BILC recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect

The school recognises that abuse, neglect and safeguarding issues are rarely stand alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.

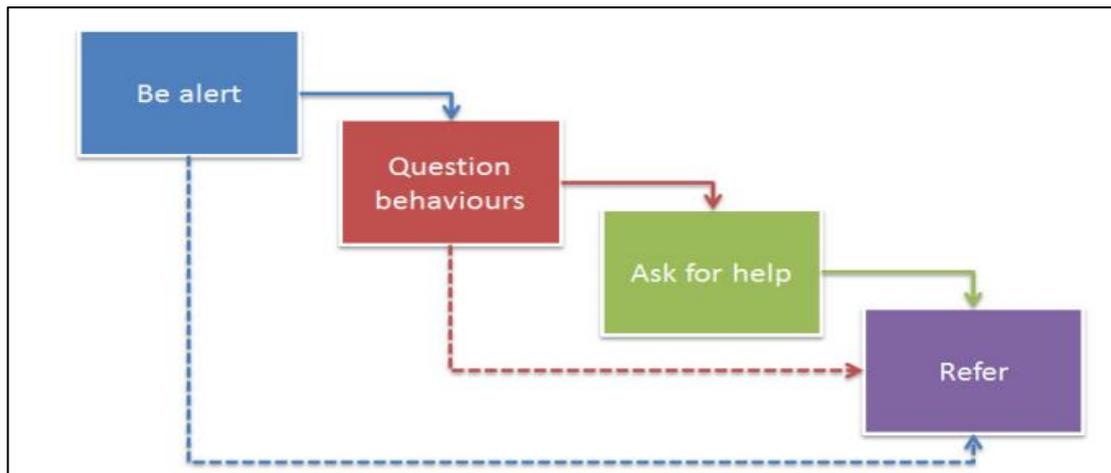
For further information see Appendix 1 of this policy and Appendix 7 for links to advice and support.

- All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, deliberately missing education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. BILC acknowledges that safeguarding includes a wider range of specific issues including (but not limited to):

Child abduction and community safety incidents	Homelessness
Children with family members in prison	Honour based abuse (so called)
Children Missing Education (CME)	Mental health
Child missing from home or care	Modern slavery & the National Referral Mechanism
Child Sexual Exploitation (CSE)	Online safety(including awareness of the school's systems for filtering and monitoring)
Child Criminal Exploitation (CCE)	Child-on-child abuse (including cyberbullying, racial, prejudicial and discriminatory bullying)
County Lines	Preventing radicalisation and extremism
Cybercrime	Relationship abuse
Domestic abuse	Serious Violence
Faith based abuse	Sexual Violence and Sexual Harassment
Female Genital Mutilation (FGM)	Upskirting
Forced marriage	Youth produced sexual imagery, nudes/semi-nudes ("Sexting")
Gangs and youth violence	
Gender based abuse and violence against women and girls	

- Additional information on these safeguarding issues and information on other safeguarding issues is included in KCSIE Annex B and Appendix 2 of this policy.
- Members of staff are aware that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child.
- **All** staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.
- **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.
- It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and explored by the DSL on a case-by-case basis.

- All members of staff are expected to be aware of and follow this approach if they are concerned about a child (taken from 'What to do if you are worried a child is being abused' DfE 2015)



- Parental behaviours may also indicate child abuse or neglect, so staff should also be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.
- Safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children offsite. Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- By understanding the indicators of abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- **In all cases, if staff are unsure, they should always speak to the designated safeguarding lead or deputy.**

## 11. Child protection procedures – taking action

- BILC adheres to the Haringey Safeguarding Children multi-agency partnership procedures (Haringey LA). The full Haringey LA procedures and additional guidance relating to specific safeguarding issues can be found on their website: <https://haringeyscp.org.uk/>
- Staff (volunteers, governors, contractors, agency and supply staff and visitors) must follow the school procedures set out in this and the following sections should they identify or have a worry about a child protection issue. The actions staff and other adults should take if there are any safeguarding concerns about a pupil are listed below. This will be covered in staff training, including new staff induction. Visitors will be provided with an information sheet on arrival, summarising the school systems and how they should pass on any child protection concerns. If anyone is unsure about reporting concerns, they must speak to the DSL and they can also refer to the DfE publication 'What to do if you're worried a child is being abused' (March 2015).
- All staff are made aware of the process for making requests for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- BILC recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.

### Action if a child is in immediate danger or suffering harm or likely to suffer harm

- As soon as a member of staff or adult working in the school becomes aware that a child is suffering or likely to suffer harm, or in immediate danger they must let the DSL know immediately.
- The member of staff must make a record of what the child (ideally contemporaneously) is telling them/has told them and also record this on MyConcern as soon as possible after the alert to the DSL. The handwritten record should be scanned and added to the electronic record (see details under making a record of a concern).
- The DSL, along with the relevant Deputy DSLs will review the case and decide on the next steps. If a child is in immediate danger or is at risk of harm, a request for support should be made immediately to Integrated

Children's Services (Haringey's Safeguarding Team) and/or the police in line with Haringey LA procedures.

- If the DSL or deputy DSL is not available, for example out of school hours, then any staff member or other adults can make a referral. The contact numbers for the MASH team are listed on Page 2 of this policy. During this call you should seek the advice about notifying parents, remembering that in some situations this could be unsafe or cause the child more harm. During your phone call if you are a professional working with children you may be asked to complete a **MASH referral form** within 24 hours. This should be emailed securely to [mashreferral@Haringey.qcsx.gov.uk](mailto:mashreferral@Haringey.qcsx.gov.uk).
- Any member of staff/adult making a **direct** referral to the MASH team must inform the DSL as soon as possible, verbally and provide a written record of the concerns and actions taken.

**Action if a concern about a child is not in immediate danger or risk,**

- Staff must be vigilant at all times. In doing this staff may well notice safeguarding concerns that do not place a child at immediate risk of harm. Staff must be mindful that no concern is too small not to share and that they are vital in helping the DSL to build a picture of the child's well-being, welfare, mental health and safety and take the necessary action. Examples of concerns could be a child looking unkempt, saying or making a comment that arouses your suspicions or a change in character/behaviour.
- Staff must follow school procedures and record the concern on MyConcern. The DSL will ensure that there is continuous monitoring of the MyConcern throughout the day so no concerns are missed and any necessary actions are taken. The member of staff should not hesitate in also discussing their concern with the DSL or deputy DSL. The DSL will review this information, with any other safeguarding concerns they have on record, and take any necessary actions.

**Guidance on receiving a disclosure from a child**

Staff should follow this approach:

- Listen to what the child has to say. Allow them time to talk freely and do not ask leading questions. Reassure the child that they are doing the right thing in telling you. Let them know they are being taken seriously and that nothing they say is or will cause a problem. Do not tell them they should have told you sooner.
- Stay calm and do not show that you are shocked or upset. Do not in any circumstance promise to keep what they have told you a secret. Explain you will have to pass this information on and what will happen next.
- If possible, make a handwritten record as the child speaks. If this is not possible, make a handwritten record as soon as possible afterwards. Follow the school procedure to also make a report on MyConcern
- Speak to a DSL or deputy DSL immediately if the child is in **immediate risk** or **has been harmed** as noted above.
- Under no circumstances should the staff member undertake any investigation into the concern.
- Any allegations about staff must be reported directly to the headteacher, or in their absence, a deputy headteacher, unless the allegation is against the headteacher in which case the chair of governors should be informed. (See later section.)

**Action if a concern about a child has been identified**

- The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps. They may also seek advice or guidance from a social worker at the Haringey's Safeguarding Team service who are the first point of contact for Integrated Children's Services (ICS).

**Making a record of a concern or disclosure**

- Any child protection concerns should be entered into MyConcern. If the concern is a direct disclosure from a child then this should be recorded in writing so there is a contemporaneous record of the disclosure, which can be used as evidence should a case go to court. The start, end time, location and date should be added to the report. A summary of the report should be made on MYConcern and the DSL or deputy informed immediately.

### Early Help Assessments

- The school will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. Staff are trained to be alert to the potential for early help, identify children that may benefit from early help and raise their concerns with the DSL.
- BILC recognises that any child may benefit from early help. BILC staff are particularly alert to the potential need for early help for a child who:
  - Is disabled or has certain health conditions and has specific additional needs
  - Has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
  - Has a mental health need;
  - Has a family member in prison, or is affected by parental offending;
  - Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
  - Has returned home to their family from care.
- If the DSL views that an early help assessment is appropriate they or the deputy DSLs will lead on liaising with other agencies and in setting up inter-agency assessment, as require. Staff may be required to contribute and/or provide support in the early help assessment. They will ensure the appropriate early help support is put in place to support the child.
- The DSL will keep all early help cases under constant review and consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves. If, after the request for support or any other planned external intervention, a child's situation does not appear to be improving, the DSL will take further actions. This may include a request for advice and support to Haringey's Safeguarding Team.

## **12. Notifying parents and carers of child protection concerns**

- Parents/carers will be informed of child protection concerns unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation. Such discussions will be undertaken by the DSL or deputy DSL, although this may be delegated to another member of staff who is part of the safeguarding team, and maybe already working in with the family. For example, the Children and Families Liaison Officers/Parental Engagement Officer
- The DSL will liaise with Haringey safeguarding team, before making a decision not to inform parents/carers of a child protection concern.
- In the event of a request for support to the Haringey's Safeguarding Team being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by Haringey LA.
- Parents/carers will normally be notified in the case of allegations of abuse made against other pupils, unless it is unsafe to do so. The same applies to the person(s) the allegation is made against if they are a child.

## **13. Confidentiality information sharing and record keeping**

### **Confidentiality**

- All members of staff must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.
- All staff must be aware that they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.
- The Headteacher or DSL (and DDSL and members of the safeguarding Team) will share information about a child on a 'need to know' basis to help maintain confidentiality.
- Confidentiality is also addressed in this policy with respect to record-keeping below and allegations of abuse against staff in the section below and in the school's policy. More details are given in Appendix 4.

## **Information Sharing**

- BILC recognises our duty to share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2022.
- The safety of the child is always paramount, any concerns about sharing information must not be allowed to stand in the way of ensuring the welfare and safety of pupils.
- Staff should never promise a pupil that they will not pass on child protection concerns to the relevant staff and agencies. However, the child should be reassured that:
  - their disclosure will be taken seriously, and it is **not** creating a problem
  - their disclosure will only be shared with relevant staff
  - staff will be sensitive to their feelings and concerns
  - their wishes will be heard
  - they will be kept informed of actions and support.
- The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children. The school may legitimately share information without consent where: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk.

BILC has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is compliant with all matters relating to confidentiality and information sharing requirements. Our trained Data Protection Officer is: Duwan Farquharson, Director of Business and Operations.

DfE Guidance on Information Sharing (July 2018) provides further detail. The 7 'golden rules' for sharing information support staff who have to make decisions about sharing information. This can be found on the shared drive.
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputies).

## **Record keeping**

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing contemporaneously (this may be used as evidence if the disclosure becomes a Police matter) on the school safeguarding system and passed without delay to the DSL. This should include speaking to the DSL. A body map will be completed if injuries have been observed and this information is recorded and uploaded to MyConcern.
- Records must be completed at the time using the child's words and shared as soon as possible after the incident/event. The record must be signed and dated by the member of staff. If there is an immediate concern the member of staff should consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they should discuss their concerns with the DSL. Paper copies of concern forms are kept in the staffroom.
- Safeguarding records are kept for individual children and are maintained separately from all other records relating to the child in the school. Safeguarding records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL (and DDSLs). Safeguarding records are shared with staff on a 'need to know' basis only.
- Records will also be kept of any telephone calls, meetings or other communications for each child to build a full and detailed chronology. This may include other school records, such as first aid, medical treatment if the child is unwell, attendance and punctuality and behaviour.
- All safeguarding records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover. These will be given to the new DSL and a receipt of delivery will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school in advance of a child leaving. For example, information that would allow the new school to continue to provide support.

## **14. Multi-Agency Working**

- BILC recognises and is committed to its responsibility to work within the Haringey LA multi-agency safeguarding arrangements. The leadership team and DSL and DDSLs will work to establish strong and co-operative local relationships with professionals in the safeguarding partners and other agencies and sources of support in line with statutory guidance.
- BILC recognises the importance of multi-agency and partnership working and is committed to working alongside all agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to Haringey LA processes as required. Such as: participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

## **15. Staff Induction, Awareness and Training**

- All members of staff have been provided with a copy of part one of 'Keeping Children Safe in Education' (2023) (or for at the discretion of the Governing Body Annex A instead) which covers safeguarding information for all staff.

School leaders, including the DSL will read the entire KCSIE document.

- School leaders and all members of staff who work directly with children will also be expected to read Annex B within Keeping Children Safe in Education 2023.

All members of staff have signed to confirm that they have read and understood KCSIE Part One (or Annex A) and Annex B. This information is kept by the Headteachers' PAs.

- **All** staff are expected to be aware of systems within their school which support safeguarding. This will be explained to them as part of staff induction and updated on a regular to ensure they are fully aware of current practice. This includes:
  - safeguarding and child protection policy, which should amongst other things also include the policy and procedures to deal with child-on-child abuse
  - behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying)
  - safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods
  - staff behaviour policy (often known as code of conduct) – this should include low-level concerns, allegations against staff and whistle blowing
  - role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- The school aims to keep the profile and importance of safeguarding high with staff, pupils, parents, governors/trustees, visitors and other adults who are associated or work with the school.
- . All staff members (including agency and third-party staff) will receive appropriate child protection training to ensure they are aware of a range of safeguarding issues. Basic child protection training will take place annually including online safety training. In addition, a range of other specific safeguarding issues have been prioritised by leaders as most pertinent to the school. This includes training in Prevent, mental health, child-on-child abuse, child sexual exploitation and child criminal exploitation and domestic violence.
- All staff will receive regular safeguarding and child protection updates through email, staff meetings, e-bulletins to provide them with relevant skills and knowledge to safeguard children effectively.
- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive child protection training including in online safety, behaviour management and the staff code of conduct to ensure they are aware of the school internal safeguarding processes as part of their induction.
- All staff members (including volunteers, agency and third-party staff) will be made aware of the BILC expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP)/online safety, social media/use of technology.
- Staff will be encouraged to contribute to and shape BILC safeguarding arrangements and child protection policies: all staff and Governors will be invited to contribute ideas. Headteachers will provide regular reports to the Governing Body detailing safeguarding training undertaken by all staff and will maintain up to date register of who has been trained.

- Although the BILC has a nominated lead(s) for the Governing Body (Marilyn Francis), all members of the Governing Body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

## **16. Safer Working Practice**

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in BILC's code of conduct. The BILC follows the guidance (updated February 2022) that is found on on the Safer Recruitment Consortium website [Home \(saferrecruitmentconsortium.org\)](https://www.saferrecruitmentconsortium.org)
- Staff will be made aware of the school behaviour management and physical intervention policies, and any physical interventions/use of reasonable force must be in line with agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant BIC policies including staff code of conduct, Acceptable Use/online safety policies, and Social Media and data protection

### **Staff Supervision and Support**

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The BILC will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children.
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.
- BILC will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.

## **17. Online safety**

The requirements of KCSIE 2022 are listed in Appendix 3 of this policy – this has been updated to reflect changes for 2022).

- It is recognised by BILC that the use of technology presents challenges and risks to children and adults both inside and outside of school. As a school we will empower, protect and educate the community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate. The school sees technology and its use permeating all aspects of school. Our integrated approach to online safety is set out in detail in:
  - The online safety policy and AUP for pupils, parents and staff
  - Mobile phone and social media policy
  - Use of images policy
  - Remote learning policy
  - Threaded through other policies, including policies for the curriculum, subject teaching, behaviour, child-on-child abuse and RSE/PSHE.
  - Role and responsibilities of the DSL
  - Parental engagement policy
- The school identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk as set out in KCSIE:
  - **content:** being exposed to illegal, inappropriate or harmful material; for example, pornography, fake news, racist or radical and extremist views;

- **contact:** being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images, or online bullying.
- **commerce:** risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the DSL and ICT administrator or Director of Business.
  
- The DSL has overall responsibility for online safeguarding within the school but will liaise as necessary with other members of staff.
- BILC uses a wide range of technology. This includes computers, laptops, tablets and other digital devices, chromebooks, the internet, our learning platform, intranet and email systems, messaging systems and other digital devices and systems.. All BILC owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place. All devices owned by staff, pupils and visitors will also be used in accordance with our acceptable use policies and the appropriate safety and security measures.
- BILC recognises the specific risks that can be posed by mobile technology, including mobile phones and cameras. In accordance with KCSIE 2022 and EYFS 2021 the BILC has appropriate policies in place that are shared and understood by all members of the community. Further information regarding the specific approaches relating to this can be found in our online safety, mobile technology, social media, acceptable use and image use policies which can be found on the staff shared drive.
- BILC will do all we reasonably can to limit children's exposure to online risks through our school IT systems and will ensure that appropriate filtering and monitoring systems are in place and that these meet the DfE [standards for filtering and monitoring](#) (March 2023). These are:
  1. identify and assign roles and responsibilities to manage filtering and monitoring systems.
  2. review filtering and monitoring provision at least annually.
  3. block harmful and inappropriate content without unreasonably impacting teaching and learning.
  4. have effective monitoring strategies in place that meet their safeguarding needs
- To ensure we meet the standards for filtering and monitoring, we will:
  - consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks
  - be informed in part, by the risk assessment required by the Prevent Duty
  - ensure the leadership team manage them effectively and know how to escalate concerns when identified
  - inform all users that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights and privacy legislation.
  - require pupils, staff and visitors if they discover unsuitable sites or material,
    - to follow the school procedures If they find unsuitable material they are required to: turn off monitor/screen,
    - report the concern immediately to a member of staff
    - report the URL of the site to technical staff/services
  - record and report to the DSL and appropriate technical staff, any filtering breaches or concerns identified through our monitoring approaches..
  - immediately report any access to material believed to be illegal to the appropriate agencies, such as the [Internet Watch Foundation](#) and the Police.
  - ensure that in implementing appropriate filtering and monitoring - "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding
  - regularly check on the effectiveness of the filtering and monitoring systems
  - review the standards and discuss with IT staff and service providers what more needs to be done to support schools and colleges in meeting this standard.

- BILC acknowledges that whilst filtering and monitoring is an important part of schools/CC online safety responsibilities, it is only one part of our approach to online safety. Strategies will include:
  - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
  - Learners' internet use will be supervised by staff according to their age and ability.
  - Learners will be directed to use age-appropriate online resources and tools by staff.
- BILC will ensure a comprehensive whole schools/CC curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.
- BILC will build a partnership approach to online safety and will support parents/carers to become aware and alert by:
  - Providing information on our school website
  - Offering specific online safety events for parents/carers
  - Highlighting online safety at existing parents' events
  - Sending links and information to parents to promote online safety
- BILC will ensure that online safety training for all staff is integrated, aligned and considered as part of our overarching safeguarding approach. . This will include amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring.
- The DSL will respond to online safety concerns in line with the child protection and other associated policies such as child-on-child abuse, ,anti bullying and behaviour and wellbeing. Internal sanctions and/or support will be implemented as appropriate. Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- The BILC will carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our children face. We will use the LGFL audit tool to facilitate this

## **18. Remote Learning**

- BILC will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using BILC/CC provided or approved communication channels; for example: BILC provided email accounts and phone numbers **and** agreed systems such as Google Classroom and Zoom. Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our BILC staff code of conduct and Acceptable Use/online safety policies. When delivering remote learning, staff will follow our policy and guidance for remote learning.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. Parents /carers will be informed who from BILC/CC their child is going to be interacting with online and who they contact in case they need help and/or support.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parental controls are implemented at home.

## **19. Safeguarding Children with Special Educational Needs and Disabilities or Health Issues**

- BILC acknowledges that children with special educational needs or disabilities (SEND) or certain medical or physical health conditions can face additional safeguarding challenges both online and offline. These children may have an impaired capacity to resist or avoid abuse both offline and online and face additional barriers in recognising abuse and neglect. These can include:
  - assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration

- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
  - the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs, and
  - communication barriers and difficulties in managing or reporting these challenges.
  - cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- Members of staff are encouraged to be aware that children with SEN and disabilities can be disproportionately impacted by safeguarding concerns, such as bullying and exploitation.
  - Children with communication difficulties will be supported to ensure that their voice is heard and acted upon.
  - All members of staff will be encouraged to appropriately explore possible indicators of abuse such as behaviour/mood change or injuries and not to assume that they are related to the child's disability and be aware that children with SEN and disabilities may not always outwardly display indicators of abuse. To address these additional challenges, our school will always consider extra pastoral support for children with SEN and disabilities. Details of support and provision can be found in the school's SEND policy and annual report.
  - The DSL (or deputies) will work closely with the designated SENCOs to share information and plan support and monitor as required.

## **20. Mental health and children requiring mental health support**

- All staff will be made aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are made aware of how children's experiences, can impact on their mental health, behaviour, attendance and progress in school. Staff will be given regular training in mental health issues and how to recognise when child's mental health may be at risk.
- BILC/CC have appointed mental health first aiders, who have been trained to have the knowledge and skills to promote and lead on wellbeing and mental health across the school. These members of staff are led by an appropriately trained senior member of staff.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Staff are expected to be vigilant at all times and if they have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.
- BILC is proactive in promoting the mental health and well-being of pupils and works closely with professionals (such as CAMHS practitioners; counsellors; Educational Psychologists, Trailblazers) as well as parents to raise awareness and offer support as This includes links to the school's approach for preventing and tackling bullying.
- The school has in place a range of ways to support children's mental health both within and beyond the school. This includes routes to escalate and clear referral and accountability systems. To support children's mental health the BILC has trained mental health first aiders, safe spaces, access to counselling, mental health leads and regular staff CPD from professionals.

## **21. Children in need of a social worker (Child in Need and Child Protection Plans)**

- BILC recognises that pupils may need a social worker due to safeguarding or welfare needs and that children may need help due to abuse. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.
- The DSL and all members of staff will work with and support social workers to help protect these and all vulnerable pupils. The DSL will always consider the support of the social worker to ensure any decisions are made in the best interests of the child's safety, well-being, welfare and educational outcomes.

## **22. Looked after children, previously looked after children and care leavers**

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

- The DSL has details of a child's social worker and relevant virtual school heads. Appropriate staff are provided with relevant information about each looked after child's legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
- The **Brook** has an appointed designated teacher, Carlos Teixeira, who is responsible for promoting the educational achievement of looked-after and previously looked-after children in line with statutory guidance. These designated teachers will have the relevant qualifications and experience and receive appropriate training to perform the role. The designated teachers will:
  - Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to.
  - Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium funding can be best used to ensure each child's well-being and progress. This includes (from June 2021) a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.
- The DSL and designated lead for looked after children will work with the local authority to ensure suitable arrangements are in place for care leavers, including with the appointed Personal Adviser, and will liaise with them should any issues occur.

### **23. Children who are absent from education**

- All staff should be aware that children being absent from school or college, particularly repeatedly and/or for prolonged periods, and children missing education can act as a vital warning sign of a range of safeguarding possibilities. This might include abuse or neglect, such as sexual abuse or exploitation or student criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage
- BILC has in place robust systems for recording and monitoring daily attendance and punctuality of pupils. This includes 'first day' calls, follow up calls, letters home and home visits.
- BILC recognises the importance of keeping in touch with parents and carers to promote and ensure the welfare, well-being and safety of pupils. The school will hold more than one emergency number for each child to ensure that a parent/carer can be contacted urgently or for the DSL to check on the well-being of a pupil.
- BILC is aware of its duty to report any missing children to the local authority. Full details of these systems for monitoring and supporting children with poor attendance and how BILC follows statutory advice in removing pupils from the school roll can be found in the schools' attendance policies.

### **24. Child-on-Child Abuse**

- All members of staff at BILC recognise that children can abuse their peers. This can happen both in and out of school and online. We believe that no form of abuse can be tolerated. All victims will be taken seriously, offered reassurance and appropriate support, regardless of when and/or where the abuse has taken place and assured that they are not creating a problem. Staff must be mindful that their response could impact on another child coming forward in future.
- All staff should understand the following aspects of child-on-child abuse and be clear about the school's approach:
  - that even if there are no reports in their schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have **any** concerns regarding child-on-child abuse they should speak to their designated safeguarding lead (or deputy).
  - the importance of challenging inappropriate behaviour between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as "just banter", "just having a laugh", "part of growing up" or "boys being boys" can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

- that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved.
- that children may not find it easy to tell staff and a reminder that children can show signs in ways they hope adults will notice and react.
- In line with KCSIE 2023 the BILC recognises that child-on-child abuse is likely to include, but may not be limited to:
  - bullying (including cyberbullying, prejudice-based and discriminatory bullying)
  - physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
  - abuse in intimate personal relationships between peers
  - sexual violence
  - sexual harassment
  - upskirting (which typically involves taking a picture under a person's clothing without them knowing with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm)
  - causing someone to engage in sexual activity without consent
  - consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
  - initiation/hazing type violence and rituals
- Paragraph 35 of KCSIE 2023 fully details the types and forms of child-on-child abuse can take that staff should be aware of can be found in Appendix 5 of this policy.
- When responding to concerns relating to child on child sexual violence or harassment, BILC will follow the procedures set out in Appendix 5 of this policy. This follows the guidance outlined in KCSIE 2023 Part 5.
- BILC recognises consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery) as a safeguarding issue; all concerns must be reported to and dealt with by the DSL (or deputies). The school will follow its protocol which follows the following advice
  - [DfE Searching Screening and Confiscation Advice](#) (updated July 2022)
  - [UKCIS Education Group Sharing nudes and semi-nudes advice for education settings.](#)Local advice: <https://www.haringey.gov.uk/social-care-and-health/health/public-health/sexual-health/im-young-person-25-and-under-looking/information-sexual-health-and-relationships>
- BILC has in place a detailed policy and procedures for responding to and dealing with incidents of child on child abuse set out in a separate policy (see Appendix 6). The policy includes the BILC's response to any report of child on child abuse, including the fact that:
  - Alleged victims, perpetrators and any other child affected by child on child abuse will be supported by a member of BILC wellbeing/pastoral team
  - Close liaison and collaboration with parents/carers
  - Informing the police and/or Haringey's Safeguarding Team in cases of sexual assault

Appendix Six provides full details of the school's approach to child on child abuse and the types and forms of such abuse of which staff should be aware.

## **25. Children who are lesbian, gay, bi, or trans (LGBT)**

- A child or a young person within BILC may be LGBT. The BILC acknowledges that this in itself is not an inherent risk factor for harm. However, the BILC recognises that children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.
- Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.
- LGBT inclusion is part of the school's [Relationships Education, Relationship and Sex Education and Health Education](#) curriculum.

## **26. Gangs, County Lines, Serious violence, Crime and Exploitation**

- BILC recognises the impact of gangs, county lines, serious violence, crime and sexual exploitation. It is recognised that the initial response to child victims is important and that staff will take any allegation seriously and work in ways that support children and keep them safe.
- All staff have been trained and recognise the need to be vigilant for the signs that may include, but not exclusively (see further information in Appendix 2):
  - unexplained gifts/new possessions – these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs.
  - children who go missing for periods of time or regularly come home late
  - children who regularly miss school or education or do not take part in education
  - change in friendships/relationships with others/groups
  - children who associate with other young people involved in exploitation
  - children who suffer from changes in emotional well-being
  - significant decline in performance
  - signs of self-harm/significant change in wellbeing
  - signs of assault/unexplained injuries.

## **27. Female genital mutilation (FGM)**

- All staff are made aware of the issues around FGM, so-called 'honour'-based abuse and forced marriage, as well as the signs and symptoms, the actions they must take and the MANDATORY duty to reporting any concerns to the Police . under Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015)
- Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers (and all other staff and adults associated with the school). If a teacher or member of staff, in the course of their work, discovers that an act of FGM appears to have been carried out (or maybe carried out) on a girl under the age of 18, the teacher/member of staff **must** report this to the police . Those failing to report such cases may face disciplinary sanctions.
- . Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).
- Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.
- See Appendix B for further details of so-called 'honour'-based abuse and forced marriage

## **28. Preventing radicalisation**

- Children are vulnerable to extremist ideology and radicalisation Schools have a duty to prevent pupils from being drawn into terrorism. Appendix 2 sets more details for staff on preventing radicalisation.
- The DSL will undertake Prevent awareness training and make sure that staff are appropriately trained to equip them to identify and protect any pupils at risk of radicalisation.
- The DSL (and any deputies) are aware of local procedures for making a Prevent and Channel referral which is seen as part of the school's wider safeguarding obligations. . Prevent referrals are assessed and may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are at risk of being drawn into terrorism and consider the appropriate support required. An individual will be required to provide their consent before any support delivered through the programme is provided.
- The DSL will ensure a detailed Prevent risk assessment is undertaken and reviewed at least annually. This includes the risks posed by pupils' access to the internet and social media and the school's mitigating actions, such a monitoring and filtering internet use.

## **29. Use of reasonable force**

- The school has in place a policy for the use of reasonable force which enables and supports staff to make appropriate physical contact and use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. 'Reasonable' in these circumstances means 'using no more force than is needed'.
- The school's policy follows DfE guidance [Use of reasonable force in schools](#), and includes:
  - response to risks presented by incidents involving children with additional vulnerability - SEND, mental health or with medical conditions,
  - duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and their Public Sector Equality Duty
  - positive and proactive behaviour support to reduce the occurrence of challenging behaviour and the need to use reasonable force.

The policy pertaining to the Use of Reasonable Force is available to staff on the BILC's intranet.

### **30. Curriculum – Opportunities to Teach Safeguarding**

- We recognise that schools play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour; what is 'safe'; to recognise when they and others close to them are not safe; and how to seek advice and support when they are concerned. This is a crucial part of preventative education.
- BILC has put in place a whole school approach to helping pupils understand how to keep themselves safe. This aims to prepare pupils and students for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment.
- The BILC's approach to teaching pupils about safeguarding, including online safety, is part of providing a broad and balanced curriculum. The detail of this is set out in detail in the policy/policies for Curriculum/RSE/PSHE/online safety. The school makes use of published guidance to develop and deliver this provision, including for RSE, PSHE, and teaching online safety.
- Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- The BILC recognises that one size does not fit all and takes a personalised and contextualised approach for more vulnerable children, victims of abuse and some SEND children, so they know how to assess risk and adopt safe practices.
- The BILC has implemented the mandatory DfE Relationships Education/Relationships, Sex and Health Education curriculum. The school is embedding this into all aspects of the curriculum to ensure equality, age-appropriate and full experiences for all pupils. Further details are given in our SMSC, RSE and PSHE curriculum policies.
- BILC systems support children to talk to about their concerns and worries with confidence in the knowledge they will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.
- Safeguarding is at the heart of everything we do at The Brook Special Primary School. Great importance is placed on identifying opportunities in the taught curriculum for children to learn about safeguarding. Our unique spiral curriculum gives pupils' opportunities to experience life in all its diversity, to acquire knowledge, understanding, and skills that significantly impact personal development, behaviour, and well-being. High level support, using bespoke resources, provides opportunities for every child to have a voice and develop individual skills required for personal safeguarding.
- Our PSE curriculum covers all areas of Safeguarding and has been devised carefully to consider the developmental level of our children. Being mindful of this, we recognise that sensitive subjects need to be taught in small groups at a level that is respectful, honest but meaningful for our children. We also deliver 1:1 sessions if a more urgent need arises. This curriculum has been co-produced in parent workshops.
- Within the curriculum, natural opportunities arise to ensure we constantly challenge children to think deeply about safeguarding matters and their own personal, physical and mental wellbeing privacy and safety. We give pupils' opportunities across the curriculum to explore values, personal rights, responsibilities and equal opportunities – all of which develop moral concepts that impact positively on safeguarding. We value pupils' questions and give them space to explore their own thoughts, ideas, and concerns; all of this is in line with the school's RESPECT mindset.
- At the beginning of every academic year the whole school works within a recovery curriculum, on a theme of "All About Me" which focuses on re-discovering skills and developing mental health and emotional well-

being. This sets the tone for the remainder of the year and also ensures that everyone is clear about their roles and responsibilities within the safeguarding framework so that excellent safeguarding outcomes can be achieved. (Please see the Schemes of Work for PSE and PSED for more detail).

### **31. Alternative provision**

- At times it may be necessary for BILC to place pupils in alternative provision either on a full or part time basis. BILC recognises the additional vulnerabilities of these pupils and that the responsibility for their safeguarding remains with BILC. BILC has put in place checks to ensure the provider meets the needs of each pupil and there is regular (daily) communication on their welfare, well-being and safety.
- This also applies to children who cannot attend school for health reasons, and will be considered on a case by case basis.

### **32. Elective home education**

- If a parent/carer wishes to educate their child at home BILC will provide advice and support to aid them in their decision making to help them make the right decision in the best interests of their child. This will include discussion with parents (and other professionals), awareness of additional needs of child with SEND and/or social worker, transition support, and informing the LA (*requirement to notify LA on removal from roll*). This is particularly important where a child has special educational needs or a disability, and/or has a social worker, and/or is otherwise vulnerable. Where a child has an Education, Health and Care plan local authorities will need to review the plan, working closely with parents and carers.

### **33. Private fostering and host families**

- Private fostering is defined as when someone who is not a parent or a 'close relative' (eg. great aunt, cousin, mum's friend or a neighbour) is looking after a child or young person under the age of 16 (under 18 if they are disabled) for 28 days or more in their own home. A relative is defined in the Children Act 1989 as a grandparent, uncle or aunt (whether by full-blood, half-blood or by marriage or civil partnership), sibling or step-parent. The school is aware of its duty to report to LA of any such arrangements the school learns about.
- If BILC makes arrangements for pupils to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. for example, as part of a foreign exchange visit or sports tour. This is often described as 'homestay' arrangements. The school will follow the guidance set out in Annex D of KCSIE.

### **34. Safer Recruitment**

- BILC is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers, (this includes agency staff, contractors and third party staff) who are safe to work with our learners and staff.
- BILC will follow the guidance in Keeping Children Safe in Education 2022 (Part Three 'Safer Recruitment') and from The Disclosure and Barring Service (DBS).
- The Governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes outlined within guidance.
- The BILC maintains accurate Single Central Records (SCR) in line with statutory guidance.
- The Governing Body will ensure that at least one of the persons who conducts an interview has completed safer recruitment training.
- BILC is committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We expect all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands and warnings. Any staff member failing to make accurate declarations or misrepresenting themselves in any way will be subject to the school's disciplinary policy.
- We will ensure that all staff and volunteers have read the staff code of conduct and understand that their behaviour and practice must be in line with it.

- The full policy is provided in Appendix 3 of this policy.

### **35. Concerns and allegations against members of staff and adults in the school**

- BILC recognises that it is possible for any member of staff or adult working on behalf of the school, including volunteers, governors, contractors, agency and third party staff (including supply teachers), visitors and contractors, to behave in a way that:
  - indicates they have harmed a child, or may have harmed a child;
  - means they have committed a criminal offence against or related to a child;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- At the BILC we have processes in place for continuous vigilance, so we can maintain environment that deters and prevents abuse and challenges inappropriate behaviour. To do this we aim to create the right culture and environment so that staff feel comfortable to discuss matters both within and, where it is appropriate, outside the workplace (including online) which may have implications for the safeguarding of children. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the BILC's safeguarding regime. The leadership team takes all concerns or allegations received seriously. If a member of staff, volunteer or other adult is concerned at the lack of response or feels their concerns will not be taken seriously then they should consider Whistle blowing - see section below.
- Allegations should be referred immediately to the Headteacher who will contact the Local Authority Designated Officer (LADO) to agree further action to be taken in respect of the child and staff member.
- In the event of allegations of abuse being made against the Headteacher staff are advised that allegations should be reported to the Chair of Governors who will contact the LADO.
- The school's procedures are consistent with local safeguarding procedures and practice guidance. In line with KCSIE 2023, we have policy and procedures in place that covers:
  - Allegations that may meet the harms threshold
  - Concerns that do not meet the harm threshold
- The schools will consult with the Local Authority Designated Officer (LADO) in the event of an allegation being made against any member of staff and adhere to the relevant procedures as set out in the schools' managing allegations against staff and volunteers policy, Keeping Children Safe in Education and the LSCB's guidance, available on Haringey LSCB website.
- The BILC will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full, even when the member of staff is no longer employed at the school and that notification of any concerns is made to the relevant authorities and professional bodies and included in references where applicable.
- Staff who are the subject of an allegation have the right to have their case dealt with fairly, quickly, and consistently and to be kept informed of its progress. Suspension is not mandatory, nor is it automatic but, in some cases, staff may be suspended. See Managing allegations against staff and volunteers policy for guidance.
- Consideration must be given to the needs of the child and recognition that a child may make an allegation against an innocent party because they are too afraid to name the real perpetrator. It is rare for a child to make an entirely false or malicious allegation, although misunderstandings and misinterpretations of events do happen.
- The BILC will ensure that all staff; paid and unpaid, are trained in good practice so that they can reduce the risk of allegations being made against them. Staff are aware of the need for maintaining appropriate and professional boundaries in their relationships with pupils and parents/carers as advised within the schools' code of conduct. As part of the Induction process, all staff will receive guidance about how to create appropriate professional boundaries (in both the real and virtual world) with all children, especially those with a disability or who are vulnerable. All staff will be made aware that behaviour that contradicts the code of conduct, which takes place outside of school, may still lead to disciplinary procedures.

- The BILC will ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003 (Abuse of Trust).
- The schools will ensure that communication between pupils and adults, by whatever method, are transparent and take place within clear and explicit professional boundaries and are open to scrutiny (see social media policy).

#### **Duty to refer to the Disclosure and Barring Service**

- BILC has a legal requirement to refer to the Disclosure and Barring Service (DBS) where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
  - engaged in relevant conduct in relation to children and/or adults,
  - satisfied the harm test in relation to children and/or vulnerable adults; or
  - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.
- Referrals will be made as soon as possible, when an individual has been removed from regulated activity. This could include when an individual is suspended, redeployed into work in an activity that is not regulated, dismissed or resigned. The school will provide the DBS with full information.
- When an allegation is made, an investigation will be carried out to gather evidence to establish if it has foundation, and the school will ensure they have sufficient information to meet the referral duty criteria in the DBS referral guidance.
- The DBS will consider whether to bar the person. If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the LADO and/or Schools Personnel Service.

#### **Duty to consider referral to the Teaching Regulation Agency**

- If the school or teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, consideration will be given to referring the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.
- The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

#### **Agreed procedures for staff to reduce risk of allegations**

- **Working 1:1**
  - This must always take place in a room where staff can be seen and / or heard from outside the room with the door open or appropriate window provision for viewing.
- **Use of personal mobile phones during school hours**
  - Personal mobile phones should not be used in class. During breaks and lunchtimes, when not on duty, members of staff are free to use their personal mobile devices in designated areas. If members of staff use their equipment in this way they are still expected to follow professional standards and abide by the school's social media policy. Personal phones **must not** be used to take photographs of school activities. Staff should always use school-owned cameras or tablets if taking photographs of children.
- **Changing Pupils who have wet or soiled themselves (not SEN pupils or EYFS)**
  - If a child has wet or soiled themselves due to illness, the parent should be called to collect the child. If this will result in a delay, then the child will be changed by school staff. The procedure for changing a child who has wet themselves should be followed:
    - member of staff collects clean clothing and wet wipes if required.
    - child undresses themselves as appropriate in one of the toilet cubicles.
    - member of staff waits outside the toilet cubicle.

- if the child needs assistance, the member of staff will call another member of staff in their phase to assist.
  - both members of staff must be within sight of each other and the dignity of child maintained at all times.
- **Changing Pupils who have wet or soiled themselves (SEN pupils and EYFS)**
    - When changing children who require intimate care, it is ideal, although not always practical, that there are two members of staff who are involved in this. Again, the guidance outlined above should be followed. All changing of pupils must only be carried out by teachers, teaching assistants, midday supervisors or office support staff directly employed by the school. Volunteers, work-experience students, teacher training students, sports coaches and consultants must never change any pupil.

- **Physical Restraint of Pupils**

A proportion of allegations against teachers and school support staff relate to incidents involving the physical restraint of pupils. In BILC:

- there will be staff trained in the use of physical restraint;
  - all staff will be trained in the use of positive behaviour supports and techniques to defuse crisis and conflict situations;
  - training will be recurrent, with annual updates at a minimum, and will be appropriate to the type of school setting and to the age and developmental level of pupils;
  - training will include information about the effects of medications pupils may be receiving and how restraint procedures might affect the physical wellbeing of the pupil during restraint procedures;
- training will include multiple methods for monitoring a pupil's well-being during a restraint

### **36. Whistle blowing**

- All staff and volunteers should feel able to raise concerns about poor or unsafe practice or other wrongdoing and be secure that such concerns will always be taken seriously by the leadership team. Wrongdoing covered by this 'public interest disclosure' includes:
  - someone's health and safety is in danger;
  - damage to the environment
  - a criminal offence (eg fraud)
  - not obeying the law;
  - covering up wrong-doing
  - misusing public funds
  - actions that negatively affect the welfare of children

All members of staff are made aware of the BILC Whistleblowing procedure which is available on the internal staff drives and google drive. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk. "If an allegation is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy"

- The DfE provides advice to staff who feel they need to raise concerns: Whistleblowing procedure for maintained schools [Whistleblowing procedure for maintained schools - GOV.UK \(www.gov.uk\)](http://www.gov.uk) and Whistleblowing [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](http://www.gov.uk).
- Staff should raise concerns with their
  - Line Manger
  - Specified person (or governor) in school such as the headteacher/principal or DSL
  - Local Authority
  - Union or Professional Association
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

### **37. The use of premises by other organisations**

- Where services or activities are provided under the direct supervision/management of staff the school arrangements for child protection will apply.

- Where services or activities are provided separately by another body using the BILC premises, the Headteacher and Governing Body will:
  - seek written assurance that the organisation concerned has appropriate policies and procedures in place with regard to safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers.
  - put in place arrangements for the organisation to liaise with the school on safeguarding matters
  - include safeguarding requirements in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.
  - If this assurance is not achieved, an application to use premises will be refused.

These arrangements apply regardless of whether or not the children who attend any of these services or activities are children on the school roll or attend the college. The BILC will follow its safeguarding policies and procedures, including informing the LADO, relating to any incident(s) that happen when an individual or organisation is using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities).

### **38. Site security and arrangements for visitors**

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within paragraphs 281-286 of KCSIE 2022. Visitors are required to sign in and out via the office visitors log and to display a visitor's badge whilst on site. Visitors will be provided with a leaflet outlining the school's safeguarding and child protection arrangements. They will be required to wear a label that indicates they are visitors and has their photograph printed on it. If they are working closely with children for periods of time (ie sports coaches; tutors; work experience) they will be required to provide details of their DBS. All visitors are expected to follow these school arrangements.
- The headteachers will use their professional judgement to decide on access arrangements and if a visitor should be supervised and/or escorted. All visitors have to sign in using the electronic register and are unable to move around the building without an escort as entrances are accessed via a fob.
- BILC will give careful consideration to the suitability of any external organisations who may provide information, resources & speakers to pupils. The arrangements for the individuals providing these services on the school's premises may include an assessment of their education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required (eg for multiple sessions).
- BILC will not accept the behaviour of any individual (parent or other) that threatens schools/ CC security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site. The gates are unlocked between 8.15 and 9.30am and 3.00 and 3.30pm. Access at all other times is only through the main entrance.

### **39. Complaints**

- The BILC has a Complaints Procedure available to parents, learners and members of staff and visitors who wish to report concerns. This can be found on the website and on the shared drive.
- All reported concerns will be taken seriously and considered within the relevant and appropriate process. Anything that constitutes an allegation against a member of staff or volunteer will be dealt with under the specific 'Procedures for Managing Allegations against Staff' policy or Appendix 4 or this policy.

### **40. Policy Monitoring and Review**

- This policy will be reviewed at least annually. The policy will be revised following any national or local policy updates, any local child protection concerns and/or any changes to our procedures. Staff will be informed of any changes made.

*Safeguarding and Child Protection Policy and Procedures (updated in line with KCSIE 2023-24)*

- The DSL and deputy DSLs meet weekly to review all safeguarding cases and check on the actions taken and what further actions are needed. This includes pupils with early help and child protection plans. Weekly team meetings, pastoral meetings and Senior Leadership Team meetings are held and review any emerging patterns which may suggest a safeguarding concern, issues may include attendance, behaviour, peer relationships and concerns raised by staff.
- The Designated Safeguarding Lead and/or Headteacher will provide regular reporting on safeguarding activity and systems to the Governing body who will not receive details of individual children's situations or identifying features of families as part of their oversight responsibility.
- The Governing Body understands its responsibilities and duties as set out in KCSIE 2022 to ensure the effectiveness of the school's safeguarding arrangements, including those for online safety. In addition to the regular reports for safeguarding provided by the DSL, governors will take a proactive varied approach to checking the school's safeguarding arrangements. This will include:
  - meetings with the DSL,
  - visits to school,
  - ascertaining the views of staff, pupils and parents through discussions and/r surveys,
  - use of an audit tool,
  - asking all governors to ask a safeguarding question during meetings with leaders/staff on other aspects of school life (such as subject meetings or SENCo meeting),
  - termly checks of the SCR,
  - review of school data
  - use of an external consultant.

## Appendix 1: Categories & Indicators of Abuse and Neglect

**All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely stand alone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another.**

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**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.

### Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent or excessively plausible explanations or a delay in seeking treatment should signal concern.

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and 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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

### Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention and affection

**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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education and **all** staff should be aware of it and of their school or college's policy and procedures for dealing with it.

**Signs that MAY INDICATE Sexual Abuse**

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

**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, for example, 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.

**Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

## Appendix 2: Specific safeguarding issues (KCSIE Annex B)

This text is taken from Annex B of KCSIE (updated for KCSIE 2023) which contains further important additional information about specific forms of abuse and safeguarding issues. This text is taken from Annex B of KCSIE (updated for KCSIE 2023) which contains important additional information about specific forms of abuse and safeguarding issues.

School leaders and those staff who work directly with children should read this Annex.

As per Part one of this guidance, **if staff have any concerns about a child's welfare, they should act on them immediately.** They should follow the school's child protection policy and speak to the designated safeguarding lead (or a deputy) - see section 11.

**Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately. Contact details are given in table at front of this policy,**

### Child abduction and community safety incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

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

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

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

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse alcohol and other drugs
- go missing for periods of time or regularly come home late, and
- regularly miss school or education or do not take part in education.

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

Child Sexual Exploitation (CSE) can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: [Child sexual exploitation: guide for practitioners](#)

### **County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line". This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can be targeted and recruited into county lines in a number of locations including any type of schools (including special schools), further and higher educational institutions, pupil referral units, children's homes and care homes.

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

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

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

Further information on the signs of a child's involvement in county lines is available in guidance published by the [Home Office and The Children's Society County Lines Toolkit For Professionals](#)

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children [5-11-year olds](#) and [12-17 year olds](#).

The guides explain each step of the process, support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online [child arrangements information tool](#) with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Children who are absent from education**

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

mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is essential to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. It is important that staff are aware of their school's or college's unauthorised absence and children missing from education procedures.

### **Children with family members in prison**

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

### **Cybercrime**

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

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

Children with particular skills and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the **Cyber Choices** programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low-level cyber-dependent offences and divert them to a more positive use of their skills and interests.

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

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

### **Domestic abuse**

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Under the statutory definition, both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

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

Young people can also experience domestic abuse within their own intimate relationships. This form of child-on-child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support.

### **Operation Encompass**

[Operation Encompass](#) operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy)) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990 (charged at local rate).

### **National Domestic Abuse Helpline**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked.

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

- [NSPCC- UK domestic-abuse Signs Symptoms Effects](#)
- [Refuge what is domestic violence/effects of domestic violence on children](#)
- [Safe Young Lives: Young people and domestic abuse | Safelives](#)
- [Domestic abuse: specialist sources of support](#) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift the focus to early intervention and encourages those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their

exclusion from the family home, and will require a different level of intervention and support. Local authority children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

### **Mental health**

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among children. See

[Every Mind Matters](#) for links to all materials and lesson plans.

### **Modern Slavery and the National Referral Mechanism**

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

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in Statutory Guidance. [Modern slavery: how to identify and support victims - GOV.UK](#)

### **Preventing radicalisation**

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

**Extremism**<sup>145</sup> 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**<sup>146</sup> refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

**Terrorism**<sup>147</sup> 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.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are [possible indicators](#) that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

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

Although not a cause for concern on their own, possible indicators when taken into consideration alongside other factors or context may be a sign of being radicalised. Further information and a list of such indicators can be found at [Radicalisation and Extremism - Examples and Behavioural Traits \(educateagainsthate.com\)](#)

## **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard<sup>148</sup> to the need to prevent people from being drawn into terrorism”.<sup>149</sup> This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads (and deputies) and other senior leaders in schools should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#), especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). Designated safeguarding leads (and deputies) and other senior leaders in colleges should familiar themselves with the [Prevent duty guidance: for further education institutions in England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

The school’s or college’s designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn

into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages.

The designated safeguarding lead (or deputy) should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the ‘Channel’ programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: [Channel guidance](#).

## **Additional support**

The Department has published further advice for schools on the [Prevent duty](#). The advice is intended to complement the Prevent guidance and signposts to other sources of advice and support.

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The [ETF Online Learning environment](#) provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

London Grid for Learning have also produced useful resources on Prevent ([Online Safety Resource Centre - London Grid for Learning \(lgfl.net\)](#)).

## **Sexual violence and sexual harassment between children in schools and colleges**

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

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

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

### **Sexual violence**

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003/135 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

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

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

- the age of 13 can never consent to any sexual activity;
- the age of consent is 16;

sexual intercourse without consent is rape.

### **Sexual harassment**

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. UKCIS Sharing nudes and semi-nudes: As set out in advice for education settings working with children and young people (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence;
- sharing of unwanted explicit content;
- upskirting (is a criminal offence);
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats.

## **Upskirting**

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

## **Serious Violence**

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

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

The likelihood of involvement in serious violence may be increased by factors such as:

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

A fuller list of risk factors can be found in the Home Office's [Serious Violence Strategy](#).

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

Advice for schools and colleges is provided in the Home Office's [Criminal exploitation of children and vulnerable adults: county lines](#) guidance. The [Youth Endowment Fund \(YEF\) Toolkit sets out the evidence for what works in preventing young people from becoming involved in violence](#).

Home Office funded Violence Reduction Units (VRU) operate in the 20 police force areas across England and Wales that have the highest volumes of serious violence, as measured by hospital admissions for injury with a sharp object. A list of these locations can be found [here](#). As the strategic co-ordinators for local violence prevention, each VRU is mandated to include at least one local education representative within their Core Membership group, which is responsible for setting the direction for VRU activity. Schools and educational partners within these areas are encouraged to reach out to their local VRU, either directly or via their education Core Member, to better ingrain partnership working to tackle serious violence across local areas and ensure a joined up approach to young people across the risk spectrum.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

### **So-called 'honour'-based abuse (including Female Genital Mutilation and Forced Marriage)**

So-called 'honour'-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving 'honour' often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

**Actions:** If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with the police and local authority children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on **teachers**<sup>150</sup> that requires a different approach (see below).

### **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

### **FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon **teachers**, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should **not** be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report

Teachers **must** personally report to the police cases where they discover that an act of FGM appears to have been carried out. [FGM Fact Sheet](#).<sup>151</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve local authority children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

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

### **Forced marriage**

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

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on](#)

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[forced marriage - GOV.UK \(www.gov.uk\)](https://www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fcdo.gov.uk](mailto:fm@fcdo.gov.uk).

**Additional advice and support**

There is a wealth of information available to support schools and colleges. See Appendix 7 and KCSIE Pages 153-160 as starting points.

## Appendix 3: Safer recruitment policy

<b>Section 1 – recruitment and selection process</b>
<p>The BILC is committed to recruiting suitable people. Staff who form part of the recruitment panel are trained to ensure that they fully understand their roles and responsibilities. At least one person on the interview panel has completed safer recruitment training.</p>
<p><b>Advert</b></p> <p>When a role is advertised both internally and externally, the role is defined through the inclusion of a job description and person specification which cover:</p> <ul style="list-style-type: none"><li>○ the skills, abilities, experience, attitude, and behaviours required for the post;</li><li>○ the safeguarding requirements and</li><li>○ whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020.</li></ul>
<p><b>Application forms</b></p> <p>The BILC uses the Haringey LA application form for any post that is being advertised. A curriculum vitae is not accepted in place of an application form. The covering letter that is sent with the form includes :</p> <ul style="list-style-type: none"><li>○ a statement advising applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.</li><li>○ information about the BILC's practices and policy on employment of ex offenders and the website link to access the Child Protection policy and practices</li></ul> <p>The application includes information that applicants are required to provide:</p> <ul style="list-style-type: none"><li>○ personal details, current and former names, current address and national insurance number; details of their present (or last) employment and reason for leaving; full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment; qualifications, the awarding body and date of award; details of referees/references; and a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.</li></ul>
<p><b>Shortlisting</b></p> <p>Shortlisting for interview takes place by at least two people who consider/look for any inconsistencies, gaps in employment and reasons given for them, and all potential concerns.</p> <ul style="list-style-type: none"><li>○ Only shortlisted candidates are asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.</li><li>○ The purpose and implications of the self-declaration are explained</li><li>○ Applicants are asked to physically sign a declaration confirming the information they have provided is if the original signature is electronic</li><li>○ An online search of shortlisted candidates is carried out as part of due diligence in order to highlight any incidents or issues that have happened and <b>are publicly available online</b>. These issues will be explored during interview.</li></ul>
<p><b>Employment history and references</b></p> <p>The BILC considers references given within the recruitment process to be of significant importance as information from references is used to confirm whether we are satisfied with the applicant's suitability to work with children. References are sought prior to an interview taking place but if they are not received in a timely manner then they are sought again after the interview. Open references will not be accepted. The BILC makes it clear to prospective employees that no appointment will be confirmed until all references are in place and any issues resolved. When considering references:</p> <ul style="list-style-type: none"><li>○ account is taken of the advice on gaining, checking, verifying and using points listed in the application form</li><li>○ it should be from a current or last employer, and where possible from the employer where the applicant last worked with children is received</li><li>○ the source of the reference will be verified, and that the person completing the reference is in a senior role</li><li>○ information on the application form will be compared with that in the reference and any discrepancies taken up with the candidate</li><li>○ the reason for the candidate leaving their current or most recent post is established</li><li>○ referees will be contacted to clarify content if the information is vague or insufficient</li></ul>
<b>Selection</b>

The BILC uses a range of selection techniques to identify the most suitable person for the post . These include

- interview questions which cover candidates' suitability and motivation for the post and for working with children, exploring experiences of working with children, probing any gaps in employment or frequent changes in employment
- exploration with candidates to determine their suitability to work with children
- involving pupils in the recruitment process in a meaningful way
- observing short-listed candidates (under appropriate supervision)
- Carrying out tasks related to the post
- 

The following questions are asked in interview:

- Do you have any unspent conditional cautions or convictions under the Rehabilitation of Offenders Act 1974?
- Do you have any adult cautions (simple or conditional) or spent convictions that are not protected as defined by the Rehabilitation of Offenders Act 1974

Candidates are informed that interviews and other observation will be recorded and all declarations checked and that information considered in decision making will be clearly recorded along with decisions made. Copies of DBS certificates are not retained unless there is a legitimate reason to do so and are then not kept longer than six months. A record is kept that vetting was carried out. Processes are carried out in line with GDPR policy and paragraph 28-260 of KCSIE Sept 2021.

### **Disclosures**

If the candidate discloses a caution or a conviction on the DBS, the BILC assesses this fairly and on an individual basis. The explanation from the candidate is taken into consideration along with consideration of:

- The seriousness and relevance to the post applied for
- How long ago the offence occurred
- Whether it was a one-off incident or a history of incidents
- The circumstances around the incident
- Whether the individual has accepted responsibility for their actions.

The reason for appointing or not appointing based on this information is also recorded as part of the interview process.

### **Risk assessments**

Individual risk assessments are carried out where appropriate

- for those who have lived and worked abroad
- resulting from an issue with the DBS
- for a colleague with a disability or health issue

The risk assessment is reviewed regularly and updated as required.

### **Section ii Pre-appointment vetting checks, regulated activity and recording information**

The following checks are undertaken when appointing individuals to work in regulated activity:

- a candidate's identity is verified through their birth certificate
- an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children is obtained
- if the individual starts work before the DBS certificate is available, a separate children's barred list is obtained
- the individual's mental and physical fitness to carry out their work responsibilities is verified
- the person's right to work in the UK, including EU nationals is verified.
- if a person has lived or worked outside the UK, further checks may be carried out
- the professional qualifications, as appropriate to job are verified.

In addition the BILC establishes that:

- an applicant employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State imposed by the GTCE, before its abolition in March 2012
- an applicant employed to carry out teaching work in relation to children, is not subject to a prohibition order issued by the Secretary of State

- individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations

The BILC considers a regulated activity to be when a person:

- is responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
- is working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
- engages in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

#### **DBS checks for those moving from a previous post.**

An enhanced DBS certificate is not required for colleagues who have worked outside of the UK providing their last post ended not more than 3 months before appointment and that they had regular contact with children; were appointed after 12 May 2006 into a post which did not include regular contact with children or they worked in a further education provision or 16-19 academy that brought them into regular contact with children. However a barred list check is carried out for those involved in regulated activity in these circumstances.

#### **DBS checks**

The BILC undertakes two types of DBS checks – enhanced and enhanced with barred list check.

- **The enhanced DBS** check provides information as a Standard DBS check about convictions, cautions, reprimands and warning held on the Police National Computer but includes additional information held by police such as interviews and allegations which is only disclosed where a chief police officer believes it to be relevant. The position being applied for/or activities being undertaken **must** be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002. This check is for staff who have regular contact with children but are not in a regulated activity.
- **The enhanced DBS check with children’s barred list information** allows an additional check, to be made, about whether the person appears on the children’s barred list, along with a check of the Police National Computer records plus additional information held by police as above. The position being applied for or activities being undertaken **must** be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check **can** also include information as to whether an individual is subject to a section 128 . This is for staff who are in a regulated activity.

If a person commences work ahead of completion of a DBS check, the person is appropriately supervised; all other checks are completed and a barred list undertaken.

The DBS check certificate will be sent to the applicant and this must be shown to the employer. Failure to do so is considered a disciplinary matter. As stated above, the BILC will assess cases fairly and in line with our recruitment and ex-offenders’ policies.

#### **DBS update service**

Individuals can join the DBS Update Service at the point that an application for a new DBS check is made. The BILC strongly advises colleagues to subscribe to this service.

For applicants who subscribe to the Update Service, the BILC will:

- obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check
- confirm the DBS certificate matches the individual’s identity
- examine the original certificate to ensure that it is valid for the children’s workforce
- ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information.

#### **Recording information- the School Central Record**

The BILC is rigorous in maintaining its School Central Record and ensures that it is regularly monitored by the Governor responsible for safeguarding. The SCR is maintained for all employed staff, agency staff and supply staff (even if work one day) and Governors. The SCR is kept electronically .

The SCR lists and dates:

- the barred list check
- an enhanced DBS check requested/certificate provided

- any prohibition from teaching check
- further checks on people who have lived or worked outside the UK
- a check of professional qualifications, where required; and
- a check to establish the person's right to work in the United Kingdom.
- Safeguarding training dates
- References
- Checks on volunteers
- Checks on governors

Details of an individual are removed from the SCR once they no longer work in the school but information about the employee is retained in line with GDPR policies . As regards supply staff, the BILC gains written confirmation from the agency supplying the member of supply staff that the business has undertaken the relevant checks and obtained the appropriate certificates. The SCR also indicates which member of staff has carried out the checks.

#### **Retention of documents**

- A copy of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10 and are not kept for longer than six months after check
- A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications are kept on their personnel file.

#### **Section iii Other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings**

##### **Individuals who have lived or worked outside the UK**

This refers to all countries including those in the EU/EEA and the BILC carries out the same checks as all other staff. DfE advice on recruiting staff from overseas is also adhered to. Any decision concerning employment of individuals who have lived or worked outside the UK is recorded in the personnel file.

Checks include: overseas records checks and/or obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked

- carrying out a risk assessment that supports decision making based on available information if the above information is not available

Applying for QTS para 284

##### **Agency and third party staff (supply staff)**

When employing agency of third party staff the BILC

- obtains written notification from the agency, or third party organisation, that they have carried out the checks on an individual who will be working at the school that the school would otherwise perform
- obtains written confirmation of the enhanced DBS check
- checks that the person presenting themselves for work is the same person on whom the checks have been made.

##### **Contractors**

When contractors are working on site, the BILC takes responsibility for checking the identity of contractors on arrival at the BILC and for determining the appropriate level of supervision. The BILC also

- agrees safeguarding requirements in the contract between the organisation
- ensures that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check
- ensures that contractors engaging in regulated activity relating to children have an enhanced DBS check (including children's barred list information)
- ensures that contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required
- facilitates individuals who are self-employed, obtaining the appropriate DBS check

##### **Trainee/student teachers**

The BILC carries out all necessary checks on initial teacher trainees who are salaried by the Willow and the Brook if they are engaging in regulated activity. For Fee-funded trainee teachers the BILC requires the initial teacher training provider to carry out the necessary checks and to receive written confirmation to the school that all pre-appointment checks have been carried out and the trainee has been judged by the provider to be suitable to work with children.

### Visitors

Visitors to the BILC include educational professionals, researchers, medical professionals and therapists, mental health practitioners, social care representatives, local councillors, HMIs, site service and utilities maintenance, police, children's relatives and other visitors attending events, speakers, lecturers, musicians, LA representatives

- The headteachers will use their professional judgment about the need to escort or supervise such visitors
- Visitors who are there in a professional capacity will have their ID checked at reception and will receive appropriate confirmation that the visitor has had the appropriate DBS check
- The BILC will not request DBS checks for visitors such as children's relatives or other visitors attending a sports day
- For individuals from external organisations that provide information, resources or speakers, the BILC assesses the education value and age appropriateness of what is delivered and ensures that the appropriate checks have been carried out

### Volunteers

The BILC recognises the valuable role that volunteers play and are often viewed by children as being safe and trustworthy adults. However, it is absolutely forbidden that a volunteer on whom no checks have been obtained can be left unsupervised or allowed to work in regulated activity

The BILC carries out a written risk assessment in order to help decide what checks, if any, are required. The risk assessment provides a written record that the following have been carefully considered:

- o the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision
- o what is known about the volunteer, including formal or informal information offered by staff, parents and other volunteers
- o whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability;
- o whether the role is eligible for a DBS check and if it is, what level is appropriate. Existing volunteers engaging in regulated activity, if there are no concerns, do not have to be re-checked if they have already had a DBS check.

For all volunteers new to working in regulated activity with children, the BILC will obtain an **enhanced DBS check** (which should include children's barred list information) The BILC will determine whether it is necessary to supervise, or to what extent there is supervision, based on the statutory guidance issued by the Secretary of State . Supervision is carried out by a person who is in regulated activity relating to children and appropriate in all the circumstances to ensure the protection of children

### Maintained school governors

All BILC governors have an enhanced DBS check but do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity . A section 128 check is required because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school . This information is recorded on the SCR. Associate members do not undergo an enhanced DBS check if they are not engaging in regulated activity within the BILC.

### Children staying with host families (homestay)

The BILC may make arrangements for children receiving education at their schools to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related (ie foreign exchange visit or sporting event)

### Alternative provision

The BILC is responsible for the safeguarding of any pupil placed in an alternative provider and ensures that we are satisfied that the provider meets the needs of the pupil. The BILC requires written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment.

### Private fostering - LA notification when identified

Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. That this arrangement is continue for more than 28 days. Where private fostering arrangements come to the attention of the school (and the school is not involved in the arrangements), the local authority will be informed so it can check the arrangement is suitable and safe for the child.

## Section iv How to ensure the ongoing safeguarding of children and the legal reporting duties on employers

### Ongoing vigilance

#### The BILC

- o believes that safeguarding vigilance continues beyond the recruitment process and
- o believes that safeguarding is not limited to recruitment procedures
- o ensures that the governing body and all staff are committed to the safety and welfare of children and this is embedded in all the school's processes and procedures and enshrined in its ethos.

#### The Governing Body

- ensures the processes are in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.

Leaders create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can assist leaders to support staff, where there is a need, and help them manage children's safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

### Existing staff

#### The BILC carries out new checks on existing staff when

- an individual working at the schools moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity are carried out;
- there has been a break in service of 12 weeks or more; or
- there are concerns about an individual's suitability to work with children.
- The employee has been in the schools for five years and does not subscribe to the update service

### Duty to refer to the Disclosure and Barring Service

The BILC is aware that there is a legal requirement for the school to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left, and they believe the individual has:

- o engaged in relevant conduct in relation to children and/or adults,
- o satisfied the harm test in relation to children and/or vulnerable adults; or
- o been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.

The DBS will consider whether to bar the person. Referrals are made as soon as possible when an individual has been removed from regulated activity. This could include when an individual is suspended, redeployed into work in an activity that is not regulated, dismissed or has resigned. The BILC provides the DBS with full information. When an allegation is made, an investigation is carried out to gather evidence to establish if it has foundation, and the BILC will ensure they have sufficient information to meet the referral duty criteria in the DBS referral guidance.

### Duty to consider referral to the Teaching Regulation Agency t:

- If the BILC or another employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, consideration will be given to referring the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002. The Secretary of State may investigate the case, and if s/he finds there is a case to answer, must then decide whether to make a prohibition order in respect of the person.

## Appendix 4: Allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

Allegations should be made to the DSL or, if the allegation concerns the Headteacher, to the Chair of Governors. An appropriate assessment of transferable risk to children with whom the person works will be undertaken and advice sought from the local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection whilst also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement and are consistent with the Haringey safeguarding procedures and practice guidelines.

### Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

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## **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), will carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, this will be agreed with the designated officer and a record of the rationale will be kept. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, this decision and the justification for it is recorded and agreement is made with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, appropriate steps are agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Effective support for the individual facing the allegation or concern is provided, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Staff can turn to trade union representatives, a trusted colleague, employee assistance programme for support.
- The parents or carers of the child/children involved are informed about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) whilst investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- The parents or carers of the child/children involved are kept informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- A referral to the DBS is made where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

- **If it is shown that an allegation is deliberately invented or malicious**, the BILC will consider whether disciplinary action is appropriate against the individual who made the allegation in line with the Code of Conduct.

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

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

Where the police are involved, wherever possible we will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the schools' disciplinary process, should this be required at a later point.

### **Additional considerations for supply teachers and all contracted staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing body will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

### **Timescales**

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

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

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

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

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

### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

### **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

### **Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

## **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

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

## **Record-keeping**

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

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

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

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other

records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

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

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

## Section 2: concerns that do not meet the harm threshold

*For additional information see the Farrer & Co publication 'Developing and implementing a low-level concerns policy: A guide for organisations which work with children.' Safeguarding Unit, Farrer and Co, Katherine Fudakowski,*

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above. The BILC will manage and record and such concerns and take appropriate action to safeguard children for dealing with concerns that do not meet the harm threshold.

Concerns may arise through a variety of sources, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks
- 

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

## **Definition of low-level concerns**

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

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

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

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

## **Sharing low-level concerns**

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

We will create this culture by:

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

## **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the schools' code of conduct.

We recognise that staff who raise concerns may wish to remain anonymous. We will respect this as far as possible but there may be circumstances where the colleague needs to be named (ie in order for a fair disciplinary hearing to be carried out). In order to promote openness and transparency we will encourage the staff member to consent to being named.

We encourage staff to self-report if they find themselves in a situation which could be misinterpreted or might appear compromising to others. There may also be occasions when they recognise that their behaviour falls below the expected Code of Conduct standards. By self-reporting it maintains a culture where everyone aspires to the highest standards of conduct and behaviour and demonstrates awareness of expected behavioural standards.

We give staff the option of sharing their low level concern verbally with a member of the safeguarding team and this is recorded by the team member to whom it is disclosed, but it is also appropriate for concerns to be raised by email.

The headteacher (who is also the DSL) is then immediately informed and he/she will

- Speak to the person who has raised the concerns(unless it has been raised anonymously), regardless of whether a written summary, or completed low-level concerns form has been provided;
- review the information and determine whether the behaviour (i) is entirely consistent with the organisation's Code of Conduct and the law, (ii) constitutes a low-level concern, (iii) is serious

enough to consider a referral to the LADO, or (iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be reclassified as an allegation and referred to the LADO/other relevant external agencies;

- seek advice from the LADO – on a no-names basis if necessary;
- speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted)

If the low level concern in fact amounts to behaviour which is entirely consistent with the organisation's code of conduct and the law, the Safeguarding lead

- will inform the individual in question what was shared about their behaviour and give them an opportunity to respond
- will speak to the person who shared the low-level concern and will provide them with feedback as to how and why the behaviour is consistent with the organisation's Code of Conduct and law

If the concern is deemed to be low level the Safeguarding lead

- will respond in a sensitive and proportionate way, discreetly and on a need-to-know basis
- will have a 'values-based' conversation with the individual about whom the concern has been raised  
For example *"I am sure you subscribe to our organisational values, so help me understand how you came to behave in a way which is not in keeping with those, so that we can understand what actions or support you might need so that we can both be confident that it will not happen again..;"*
- will outline what course of action will be taken – for example, what support or training needs to be given, how subsequent conduct will be monitored, what an action plan will comprise
- HR will be consulted if a low level concern raises misconduct or poor performance issues
- The Governing body -initially the Governor with responsibility for safeguarding - will be informed of any low level concern

If a low-level concern is shared about supply staff or a contractor, the DSL or headteacher will notify their employer so that any potential patterns of inappropriate behaviour can be identified.

## **Record keeping**

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

Records will be:

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

These records are reviewed periodically.

## **References**

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 5: Online safety

The Willow and the Brook Schools' Online Safety policies have been updated to incorporate the changes required with Keeping Children Safe in Education 2023. These can be found on the schools' websites.

## Appendix 6: Child on Child Abuse

### 1. Introduction

At BILC we believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other pupils.

We recognise that some students will sometimes negatively affect the learning and wellbeing of others and their behaviour will be dealt with under the school's behaviour policy. This latter policy includes our anti-bullying strategy of which all staff are aware and actively work to prevent bullying. The BILC will respond appropriately to ALL reports and concerns about child-on-child peer abuse; this includes sexual violence and/or sexual harassment both online and offline, including those that have happened outside of school. The BILC adopts a zero tolerance approach as we are aware of the impact that child-on-child abuse can have on a child.

This policy should be read in conjunction with the following;

- Safeguarding and child protection policy
- Behaviour policy
- Keeping Children safe in education 2022

### Child-on-child abuse

child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online. Whilst there may be no reported incidents, that does not mean that it is not taking place. The BILC motto is 'it could happen here'.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, forcing others to use drugs or alcohol or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Emotional abuse (blackmail, extortion, threats, intimidation)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand alone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)

- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

The BILC is aware that children may not find it easy to tell staff about child-on-child abuse and staff are mindful that children can show signs in ways that they hope will prompt adults to take notice and react. The BILC is aware that girls are more likely to be victims of sexual violence or sexual harassment and are also aware that children with SEND are also at increased risk.

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

## **2. Dealing with non sexual child-on-child abuse**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Indicates that young people outside the school might be affected by this pupil

The BILC's current procedures for dealing with bullying that is non sexualised covers, in the main:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers;
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm;

There may be reluctance on the part of the victim to report abuse and staff need to be vigilant for children showing them through other signs and behaviours.

### **Procedures for dealing with allegations**

If a pupil makes an allegation of abuse against another pupil

- The member of staff to whom the allegation has been disclosed must record the allegation and tell the DSL, but must not investigate it
- The DSL will follow the procedures laid out in the anti-bullying policy and will deal with the issue internally if appropriate.
- The DSL may also contact the local authority children's social care team (Early Help or MASH) and follow its advice. They will contact the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed

- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- The parents will be involved at an early stage providing this does not put the child at further risk of harm

### **Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations whether they have just occurred or whether they occurred in the past.

To achieve this, we have:

- Put systems in place for pupils to confidently report abuse
- Ensured our reporting systems are well promoted, easily understood and easily accessible for pupils
- Made it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Whilst our pupils are aware that there are designated adults to whom they can report concerns, it is often the case that they may well feel more able to disclose to a trusted, familiar adult. If an allegation of abuse against another pupil is made, the member of staff will follow the approach adopted for all disclosures:

- Listen to what the child has to say. Allow them time to talk freely and do not ask leading questions. Reassure the child that they are doing the right thing in telling you. Let them know they are being taken seriously and that nothing they say is or will cause a problem. Do not tell them they should have told you sooner.
- Stay calm and do not show that you are shocked or upset. Do not in any circumstance promise to keep what they have told you a secret. Explain you will have to pass this information on and what will happen next.
- If possible, make a handwritten record as the child speaks. If this is not possible, make a handwritten record as soon as possible afterwards. Follow the school procedure to also make a report on MyConcern
- Speak to a DSL or deputy DSL immediately if the child is in immediate risk or has been harmed
- Under no circumstances should the staff member undertake any investigation into the concern.

Issues about child-on-child abuse and the reporting systems and processes in place form part of the Relationship/sex education curriculum so that, through discussions, pupils are confident that they know how to disclose and that they will be supported and reassured if they make such a disclosure. Posters are displayed around the school to emphasise this.

As with all disclosures, written records of conversations, rationale, actions and conclusions will be maintained.

### **3. Dealing with child-on-child sexual violence and sexual harassment.**

If a member of staff is made aware of an incident or allegation of sexual violence or sexual harassment (in school, on line or outside of school) they must report it to the DSL or deputies immediately. The DSL must be involved in the decision making on the initial response by the school. The DSL will consider:

- The wishes of the victim in terms of how they want to proceed. Victims must be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. The BILC however also has a responsibility to protect other children and this will also be a consideration as to the appropriate course of action to take.
- The nature of the alleged incident(s), including whether a crime may have been committed and harmful sexual behaviour has been displayed
- The ages of the children involved
- The developmental stages of the children involved
- The power imbalance between the children (ie. age, maturity, confidence, status, disability)
- If the alleged incident is a one-off or a sustained pattern of abuse

- The possibility that sexual violence and sexual harassment can take place within intimate personal relationships between children
- The importance of understanding intra-familial harms and if sibling support is necessary
- If there are ongoing risks to the victim, other children, or staff
- If there are any links to child sexual exploitation and child criminal exploitations

If a member of staff is aware of an incident concerning the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately.

They must **not**:

- View, copy, print, share, store or save the imagery themselves, or ask a pupil to share or download it (if they have already viewed the imagery by accident, they must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

They **MUST** explain that they need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL

In all cases of incidents of sexual violence and sexual harassment:

- The victim will be reassured that they are taken seriously regardless of the time it has taken to come forward and that they should not feel ashamed nor that they will be criminalised
- The victim will be told that the incident needs to be reported and cannot be kept confidential
- All discussions and decisions concerning the incident will be put in writing
- A risk assessment will be put in place in liaison with social care
- All incidents will be investigated (see below) and the victim and perpetrator will be supported

## **Procedures for dealing with these allegations**

### **Initial review meeting**

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

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the images or videos is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- 

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

#### **Further review by the DSL**

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

#### **Informing parents/carers**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the police community support officer who support the BILC or dialling 101

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. Record-keeping arrangements set out in Appendix 3 of this policy also apply to recording these incidents.

#### **Unsubstantiated, unfounded, false and malicious reports**

If the investigation finds that the report of sexual violence or sexual harassment is unsubstantiated, unfounded, false or malicious then the DSL will consider that the child and/or young person who made the allegation is in need of support. If a member of staff then the Code of Conduct will be upheld and disciplinary action will be considered if appropriate.

## **4. Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”

- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

Appropriate response to any allegation is crucial so that children have the confidence to report abuse but also ensures that disclosures that are unsubstantiated, unfounded, false or malicious will result in the child and/or person making the allegation being offered appropriate support or disciplinary action being taken.

## Appendix 7: Sources of support and advice

Links to sources of further advice and support for school staff, volunteers, governors and parents/carers. Additional links can be found throughout KCSIE 2022, and in Annex B (specific issues) across pages 153-160.

### Support for staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- DfE: [Whistleblowing for employees - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- DfE: The online tool [Report child abuse to a local council - GOV.UK \(www.gov.uk\)](http://www.gov.uk) Council directs to the relevant local children's social care contact number:
- NSPCC: [Safeguarding children and child protection | NSPCC Learning](http://www.nspcc.org.uk)
- [What to do if you're worried a child is being abused](http://www.gov.uk) – DfE advice

### Support for Learners

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- [Kooth: Home-Kooth](http://www.kooth.com)
- 

### Support for adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)

### Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)

### Personal, social and health education and Relationships and sex education

- DfE: [Relationships and sex education \(RSE\) and health education - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- DfE: [Plan your relationships, sex and health curriculum - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- DfE: [Engaging parents with relationships education policy - GOV.UK \(www.gov.uk\)](http://www.gov.uk)
- PSHE Association: [Home | www.pshe-association.org.uk](http://www.pshe-association.org.uk)

### Domestic Abuse

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadvice.org.uk](http://www.mensadvice.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phonenumber: <https://respectphonenumber.org.uk>

### Honour Based Abuse and FGM

- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
  - FGM
- Factsheet:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

- Forced marriage resource pack: [Forced marriage resource pack - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/forced-marriage-resource-pack)
- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)

### **Contextual Safeguarding, child-on-child abuse, Sexual Exploitation and Criminal Exploitation:**

- Contextual Safeguarding Network: <https://contextualsafeguarding.org.uk>
- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- Rape Crisis: <https://rapecrisis.org.uk>
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](https://www.gov.uk/government/news/upskirting-know-your-rights)
- National bullying helpline: [Information and advice about all forms of bullying \(nationalbullyinghelpline.co.uk\)](http://informationandadviceaboutallformsbullying.nationalbullyinghelpline.co.uk)
- Kidscape: [Help With Bullying \(kidscape.org.uk\)](http://HelpWithBullying(kidscape.org.uk))

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- PHSE Rsie above resources and lesson plans: [Mental wellbeing | Overview | PHE School Zone](#)
- DfE: [Mental health and behaviour in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools)

### **Online Safety**

- CEOP: [www.ceop.police.uk](http://www.ceop.police.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Think U Know: [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Parents Info: [www.parentinfo.org](http://www.parentinfo.org)
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [Social media and online safety | NSPCC Learning](#)
- Get safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Stop it Now!: [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- UK Council for Internet Safety (UKCIS) 'Education for a Connected World Framework' [Education for a Connected World - GOV.UK \(www.gov.uk\)](#)
- DfE 'Teaching online safety in school' guidance. [Teaching online safety in schools - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/teaching-online-safety-in-schools)
- UK Council for Internet Safety (UKCIS): [UK Council for Child Internet Safety \(UKCCIS\)](http://www.ukcouncilforinternet.org)

### **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## Appendix 8: Note of concern

All concerns should be logged on MyConcern as far as possible. All staff who have a school email address will be given a MyConcern log in. However, if for any reason a concern cannot be logged via MyConcern, staff, visitors, volunteers should use the form below and pass it to a DSL.



### **CONCERN FORM – Broadwaters**

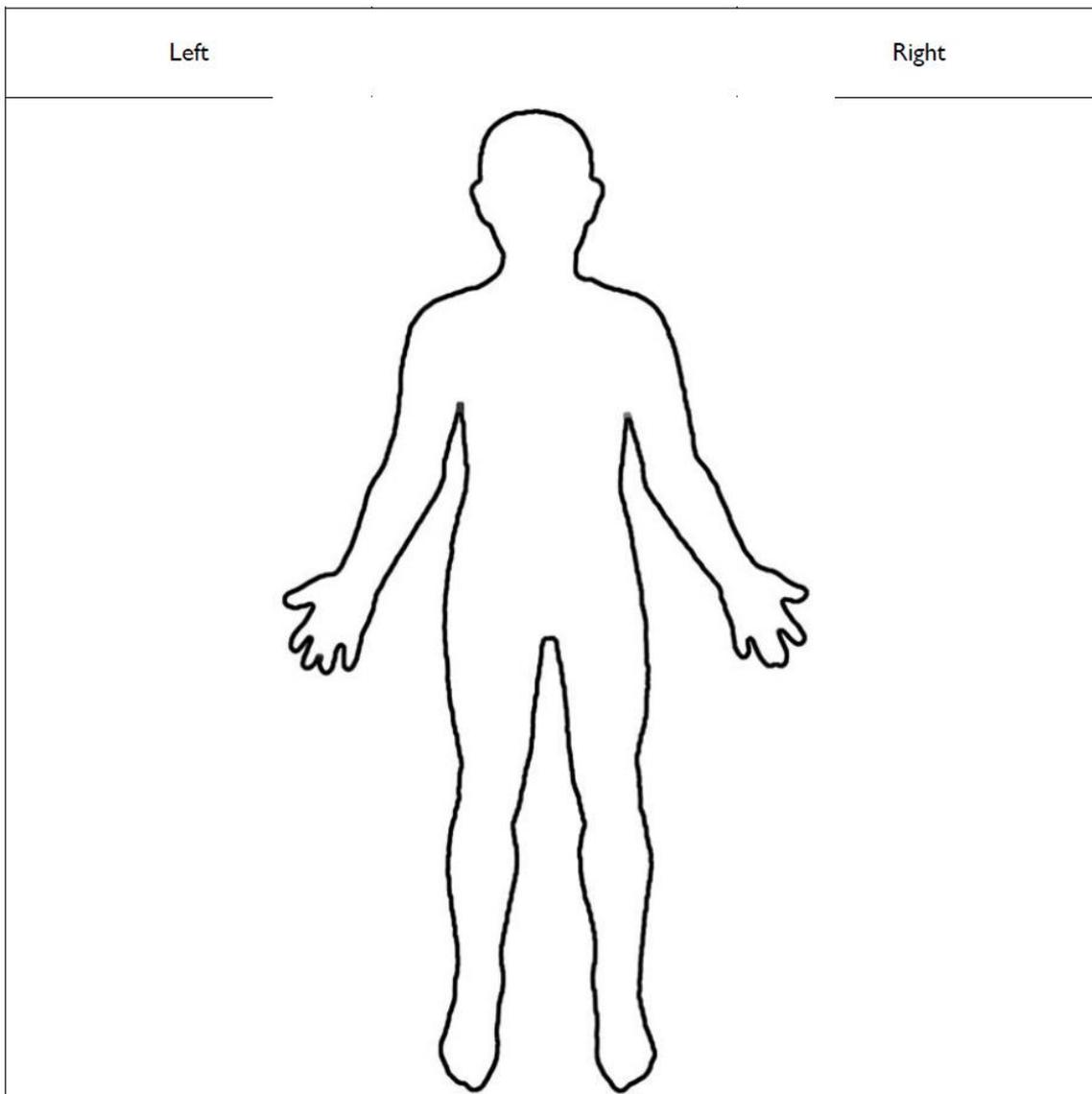
**To be filled out for EVERY concern and passed to the Headteacher/Centre Leader (DSL)**

<b>Child's name</b>							
<b>Child's room</b>							
<b>Date and time of incident</b>							
<b>Concerns</b> (continue on back if necessary) Please include: <b>Presentation of child</b> (including: physical, emotional, behaviour, marks, etc) <b>Full details</b> – do not interpret information – use the same language that was used by child) <b>Keep Questions Open</b> (Tell me what happened, where did it happen, who was there, has it happened before, are you afraid to go home)							
<b>Name of staff writing concern</b>							
<b>Signed and dated</b>				<b>Date</b>			
<b>Action taken by the Designated Teacher (DCPO) And Reason</b>	Parent contacted		Parent consent given to share info		Referral or First response contacted		No referral
	Threshold guidance level		1/ 2/ 3/ 4		Further action to be taken		Yes/no
	Reasons/Comments:						
Action/ Outcome:							

Signed CPO and dated	
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Skin map – used by non-medical staff to assist you in reporting your concerns.  
Please highlight:

Front view                  Back view



Action: To be completed by the designated person for child protection
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**THIS IS A DOUBLE-SIDED SHEET**  
Any discussion to be recorded separately on a note of discussion sheet.

## Appendix 9 - School Use of Social Media Policy

### 1. Introduction

Social media and social networking sites play an important role in the lives of many people. We recognise that sites bring risks, but equally there are many benefits to be reaped. This gives clarity to the way in which social media/mobile phones are to be used by pupils, governors, visitors, parent helpers and school staff at BILC. It will also provide guidance for parents.

This policy should be read in conjunction with the following policies

- Online safety policy and acceptable use agreements
- Safeguarding and child protection policy
- Anti bullying policy
- Behaviour policy

There are four key areas:

- The use of social networking sites by pupils within school
- Use of social networking by staff in a personal capacity
- Comments posted by parents/carers
- Dealing with incidents of online bullying

### 2. The use of social networking sites by pupils within school

The school's acceptable use agreements outline the rules for using IT in school and these rules therefore apply to use of social networking sites. Such sites should not be used/accessed in school unless under the direction of a teacher and for a purpose clearly apparent from the learning objective of the relevant learning experience. If social media sites are used then staff should carry out a risk assessment to determine which tools are appropriate. Social Media sites to be used in school include blogging sites and Twitter. Parents will give permission for children to access these sites in school as well as permission for images of their child / child's work to be included on the site. (See e-safety agreement form: parents – online safety policy)

In terms of private use of social networking sites by a child it is generally understood that children under the age of 13 are not permitted to be registered, including Facebook and Instagram to name two. Where it comes to the attention of staff that children under 13 have such accounts we will contact parents to inform them.

### 3. Use of social networking by staff in a personal capacity

It is possible that a high proportion of staff will have their own social networking site accounts. It is important for them to protect their professional reputation by ensuring that they use their personal accounts in an appropriate manner.

Guidelines are issued to staff:

- Staff must **never** add pupils as 'friends' into their personal accounts (including past pupils under the age of 16).
- Staff are **strongly advised** not to add parents as 'friends' into their personal accounts.
- Staff **must not** post comments about the school, pupils, parents or colleagues including members of the governing body.
- Staff must not use social networking sites within lesson times (for personal use).
- Staff should only use social networking in a way that does not conflict with the current national teacher's standards.
- Staff should review and adjust their privacy settings to give them the appropriate level of privacy and confidentiality.
- Staff should read and comply with 'Guidance for Safer Working Practice for Adults who Work with Children and Young People' (Safer Recruitment Consortium).
- Inappropriate use by staff should be referred to the Headteacher in the first instance and may lead to disciplinary action.

### 4. Comments posted by parents/carers

Parents and carers will be made aware of their responsibilities regarding their use of social networking. Methods of school communication include; the prospectus, the website, newsletters, letters and verbal discussion. School policies and documents provide further information regarding appropriate channels of communication and

means of resolving differences of opinion. Effective communication following principles of mutual respect is the best means of ensuring the best learning experiences for the child.

Parents must not post pictures of pupils, other than their own children, on social networking sites where these photographs have been taken at a school event.

Parents should make complaints through official school channels rather than posting them on social networking sites.

Parents should not post malicious or fictitious comments on social networking sites about any member of the school community.

#### **5. Dealing with incidents of online bullying/inappropriate use of social networking sites**

The school's anti-bullying policy sets out the processes and sanctions regarding any type of bullying by a child on the school roll.

In the case of inappropriate use of social networking by parents, the governing body will contact the parent asking them to remove such comments and seek redress through the appropriate channels such as the complaints policy and will send a letter.

The governing body understands that, 'there are circumstances in which police involvement is appropriate. These include where postings have a racist element or where violence is threatened or encouraged.' Furthermore, 'Laws of defamation and privacy still apply to the web and it is unlawful for statements to be written...which:

- expose (*an individual*) to hatred, ridicule or contempt
- cause (*an individual*) to be shunned or avoided
- lower (*an individual's*) standing in the estimation of right-thinking members of society or
- disparage (*an individual in their*) business, trade, office or profession.' (National Association of Headteachers)

#### **4. Further Guidance and advice**

Cyber bullying: Advice for headteachers and school staff (DFE)

[https://www.google.co.uk/search?hl=en&q=social+media+policy+guidance+schools&meta=&gws\\_rd=ssl](https://www.google.co.uk/search?hl=en&q=social+media+policy+guidance+schools&meta=&gws_rd=ssl)

NASUWT Advice

[http://www.nasuwt.org.uk/InformationandAdvice/Professionalissues/SocialNetworking/NASUWT\\_007513](http://www.nasuwt.org.uk/InformationandAdvice/Professionalissues/SocialNetworking/NASUWT_007513)

## **Appendix 10 - 'Guidelines for Good Practice in Intimate Care'**

All pupils have the right to be safe and treated with dignity and respect, as set out in the Charter of Children's Rights. Their welfare and dignity are of paramount importance.

Intimate Care can be defined as care tasks of an intimate nature, associated with bodily functions, body products and personal hygiene which demand direct or indirect contact with or exposure of genitals. Examples include care associated with continence and menstrual management as well as more ordinary tasks such as help with washing.

These guidelines are designed to safeguard both pupils and staff, and apply to every member of staff involved with intimate care of pupils.

The guidelines aim to support good practice in intimate care and state that;

1 **Every pupil is treated with dignity and respect and privacy is ensured.**  
**Every pupil is encouraged to have a positive self-image**

For some pupils intimate care can be carried out by one staff member alone with one pupil; for others, especially those who are not mobile, it may require two staff members working closely together. Having people working alone does increase the opportunity for possible abuse, but this is balanced by the loss of privacy and lack of trust implied if two people have to be present if it is not necessary for the student.

There will also always be other staff members around in the changing/toilet area which can act as a deterrent to possible abusers. Staff should be sensitive to the pupil's need for privacy, dignity and gentle handling.

It is important that staff never talk across a pupil and never talk about them, especially in a derogatory fashion.

Privacy is an important issue. No staff member should walk through an occupied toilet or changing area without making absolutely certain that an interruption is acceptable.

2 **The pupil is involved as far as possible in their intimate care.**

Close contact and handling should be kept to the minimum necessary to complete the task. Staff should avoid doing things for a pupil that he or she can do alone, and if a pupil is able to help, staff must ensure that they are given the chance to do so. It is necessary for staff to support the pupil in doing all they can for themselves and always to explain to the child what the adult is doing.

3 **Ensure reactions of the pupil are responded to.**

Staff must ensure that they are responding appropriately to the pupil by asking them, particularly a pupil the staff member has not previously cared for, if they may help the child or telling them what that staff member will be doing, e.g 'are you ready?', 'I am going to wash you now etc.'. It is necessary to forewarn and prepare the pupil and behave consistently – this is not necessarily a time for choices but the pupil's choice of carer for carrying out intimate tasks should always be respected where practicable.

4 **Intimate care must be as consistent as possible.**

Teachers are responsible for ensuring that their staff have a consistent approach. This does not mean that everyone has to do things in an identical fashion, but it is important that approaches are not markedly different between different staff eg is caring for menstruation consistent across different staff?

Wherever possible a child will not be cared for solely by the same adult on a regular basis but by a whole class group. This will ensure that, as far as possible, over-familiar relationships are discouraged from developing, whilst at the same time guarding against the care being carried out by a succession of completely different carers.

**5 Clarification must be sought for any uncertainties.**

If a staff member needs to be shown more than once it is imperative that they ask again. Certain intimate care or treatment procedures must only be given by the school nurse or staff who have been formally trained and assessed as competent. These are included in the Administration Of Medicines Policy.

Pupils must be supervised at all times in the toilet or changing areas and pupils should never be alone whilst on a plynth. If a pupil is on a programme eg toilet training or working towards independence, the supervision should be appropriate to the programme and, under these circumstances, it may be valid to leave a pupil for the amount of time requested in the programme.

**6 Any child protection concerns are reported.**

If, during the intimate care of the pupil a member of staff accidentally injures, scratches, causes distress, the pupil seems unusually sore in the genital area, appears to be sexually aroused by the staff's actions, or has a very emotional reaction without apparent cause, any such incident must be reported as soon as possible in line with Child Protection Procedures. The way in which pupils are physically cared for will give them an understanding of appropriate physical contact which may alert them to inappropriate contacts and help them to respond appropriately as far as they are able.

**7 Volunteers/students/supply staff**

See Child Protection and Safeguarding procedures and Student/Volunteer Guidelines. Staff in these categories should be allowed to familiarise themselves with the pupils before taking part in any personal care – even changing shoes and socks for PE. No students should be allowed to complete intimate care programmes but can take part in personal care such as dressing/undressing for swimming/PE under the supervision of the class staff.

## **Appendix 11 – Guidelines for working with pupils of the opposite sex**

These guidelines are based on the following principles:

- a. That there is positive value in both male and female staff being involved with pupils.
- b. That, ideally, every pupil would be offered a same sex carer for all of their intimate care. This, sadly, is often not possible and by necessity female staff must carry out much of the care. However, if it is obvious that a young man is embarrassed being changed by a female member of staff, we should try our utmost to provide a male member of staff if at all possible.
- c. That the individual pupil's safety, dignity, privacy and their right to exercise choice of carer are of paramount importance but need to fit within the Guidelines for Intimate Care. (see section 4)
- d. That intimate and personal care of boys and girls up to the age of 7 years 11 months can be undertaken by all special nursery nurses.
- e. That intimate and personal care for boys is undertaken by male staff where at all possible at Key Stage 2
- f. For any relief staff see Child Protection and Safeguarding procedures and Volunteer Guidelines
- g. That parent/carer preferences are taken into account in the intimate care of their children eg the request for a same sex care. These issues will be discussed carefully with the parents and carers when this arises.

These guidelines must be implemented sensitively and with respect for the feelings of all involved.

## Appendix 12 – Regular Third-Party Service Provider Declaration

In line with our Safe Recruitment Policy we are required to carry out this check with all regular third-party service providers. Please could you complete the information below and return to the form to the school at your earliest convenience. New providers will not be able to begin their work at the school until we have received this information.

<b>Name and address of Service Provider Organisation</b>	
<b>Service Type</b>	
<b>Name of Manager Completing this Form</b>	

I, the undersigned, declare that we have the following safeguarding and safer recruitment systems in place within our organisation (please tick, or provide further information if unable to tick and this will be discussed further with you):

1. We ensure that we regularly share safeguarding information and guidance with all staff as outlined in Part 1 of Keeping Children Safe in Education 2023.	
2. We have robust internal policies and systems in place to manage safeguarding issues as outlined in Part 2 of Keeping Children Safe in Education 2023.	
3. We follow the safe recruitment practices outlined in Part 3 of Keeping Children Safe in Education 2022.	
4. We have robust systems in place to manage allegations made against/concerns raised in relation to our staff as outlined in Part 4 of Keeping Children Safe in Education 2023.	
5. We have an awareness of our responsibilities and duties in relation to child on child sexual violence and sexual harassment as outlined in Part 5 of Keeping Children Safe in Education 2023	

Signature:

Date: