

## Safeguarding Policy and Procedures

(Including EYFS and Wrap-around care)

A Foundation Safeguarding Policy  
Regulatory Policy

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## Safeguarding Policy and Procedures

### 1. Policy statement, principles and terminology

The Trustees and staff of The Princethorpe Foundation ('the Foundation') comprising Princethorpe College, Crackley Hall and Crescent School ('the Schools') fully recognise the contribution they must make to safeguarding children. We recognise that all staff, including volunteers, supply staff, contractors and Trustees, have a full and active part to play in promoting children's welfare, protecting our children from harm and providing a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

Safeguarding is everyone's responsibility. Everyone has a role to play in identifying concerns, sharing information and taking prompt action in accordance with this policy.

### Related Safeguarding Policies

This policy is one of a series in the Foundation's integrated safeguarding portfolio. The following policies are related or mentioned to this policy and should be read in conjunction with this policy:

- Educational Trips Policy;
- Health and Safety Policy;
- Safer Recruitment Policy;
- Images of Pupils Policy;
- ICT Acceptable Use Policy;
- Behaviour Management and Relationship Policy;
- Missing Child Policy;
- Staff Code of Conduct ;
- Intimate Care Policy;
- Anti-Bullying and Harassment Policy.

This policy applies to all the Schools in the Foundation. This Safeguarding Policy is available on each of the School's websites and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work for the Foundation.

### Core safeguarding principles

The Foundation is committed to all children experiencing success in their learning because their welfare is promoted, and they feel safe.

Therefore:

- All children have equal rights to protection from harm.
- All staff, pupils, trustees volunteers and parents will be committed to the safeguarding of pupils.
- All staff have equal responsibility to act on any suspicion, concern or disclosure that may suggest a child is at risk of harm in the community or in school in the conformance with the safeguarding policy.
- All staff share responsibility to maintain an attitude of 'it could happen here' where safeguarding is concerned.
- If there is a concern about the welfare of a child, staff members will act in the interests of the child.
- Pupils and staff involved in safeguarding issues will receive appropriate support.

- Representatives of the whole foundation community will be involved in the development and review of this policy.

## Terminology

**Safeguarding** and promoting the welfare of children is defined as protecting children from maltreatment, preventing the impairment of 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.

**Child protection** refers to the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.

**Staff** refers, unless otherwise stated, to all those working for or on behalf of the Foundation (including supply staff), full time or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child** includes everyone under the age of 18.

**Parent** refers to birth parents and other adults with parental responsibility or those who are in a parenting role, for example step-parents, foster carers and adoptive parents.

## 2. Safeguarding legislation and guidance

This policy has regard to the following guidance and advice:

- Keeping Children Safe in Education ('KCSIE') (September 2023)  
(Staff can find a copy on the Princethorpe Staff Handbook and on Teacher Shared on the Intranet at Crackley Hall and Crescent School (a hard copy has been issued to all staff).)
  - Disqualification under the Childcare Act 2006 (September 2018)
  - What to do if you're worried a child is being abused: advice for practitioners (March 2015). A copy of this document can be found in the DSL's office at Princethorpe, Crackley Hall and Crescent School.
- Working Together to Safeguard Children (July 2018, updated 2020) ('WT')
  - Information sharing: advice for practitioners providing safeguarding services (July 2018)
- Revised Prevent Duty Guidance for England and Wales (April 2021)
  - The Prevent Duty: Departmental advice for schools and childcare providers (June 2015)
  - The use of social media for on-line radicalisation (July 2015)
- Relationships education, relationships, and sex education (RSE) and health education (September 2021)
- Behaviour in schools (September 2022)
- Working together to improve school attendance (May 2022)
- Keeping children safe in out of school settings (April 2022)
- Digital and technology standards in schools and colleges (March 2023)
- Safeguarding and protecting people for charities and trustees (June 2022), Charity Commission guidance
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (December 2020)

The Foundation's procedures for safeguarding children take account of the procedures and practices of Warwickshire County Council as part of the inter-agency safeguarding procedures set up by Warwickshire Safeguarding Children Executive. Warwickshire Safeguarding ('WS')

advice and guidance which can be found at <https://www.safeguardingwarwickshire.co.uk/>. All the schools may also need to refer children to other safeguarding children's boards as many children reside in areas outside of Warwickshire.

### 3. Key Contacts

#### Key personnel - Princethorpe College

##### Designated safeguarding leads

- **Beth Sharpe**, Deputy Head Pastoral is the Designated Safeguarding Lead (DSL)
  - E-mail: [bethsharpe@princethorpe.co.uk](mailto:bethsharpe@princethorpe.co.uk)
  - Phone: 01926 634200 or 07391 407551
  
- **Adam Rickart** DDSL
  - Email: [adamrickart@princethorpe.co.uk](mailto:adamrickart@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Anne Allen**, Deputy DSL (DDSL)
  - E-mail : [annewhite@princethorpe.co.uk](mailto:annewhite@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Andy Compton**, DDSL
  - E-mail: [andycompton@princethorpe.co.uk](mailto:andycompton@princethorpe.co.uk)
  - Phone: 01926 634200 or 07741 198866
  
- **Cyp Vella**
  - Email [cyprianvella@princethorpe.co.uk](mailto:cyprianvella@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Faye Roberts**
  - Email [fayeroberts@princethorpe.co.uk](mailto:fayeroberts@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Grove du Toit**, Head, DDSL
  - E-mail : [grovedutoit@princethorpe.co.uk](mailto:grovedutoit@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Neil McCollin**, DDSL
  - Email: [neilmccolin@princethorpe.co.uk](mailto:neilmccolin@princethorpe.co.uk)
  - Phone: 07980 309725
  
- **Louisa Fielding**, DDSL
  - Email: [nlouisafielding@princethorpe.co.uk](mailto:nlouisafielding@princethorpe.co.uk)
  - Phone: 01926 634231

##### Nominated Safeguarding Trustees

- **Mrs Helen Knight** is the Nominated Safeguarding Trustee for Princethorpe
  - Email: [helenknight@princethorpe.co.uk](mailto:helenknight@princethorpe.co.uk) [mailto:](mailto:helenknight@princethorpe.co.uk)
  - Phone: 01926 634200
  
- **Mrs Liz Griffin**, Chair of Trustees, Deputy Nominated Safeguarding Trustee
  - E-mail : [lizgriffin@princethorpe.co.uk](mailto:lizgriffin@princethorpe.co.uk)

- Phone: 01926 634200

### **Looked after children**

The designated teacher for children who are looked after by the Local Authority is:

- **Beth Sharpe** (Deputy Head Pastoral)
  - E-mail : [bethsharpe@princethorpe.co.uk](mailto:bethsharpe@princethorpe.co.uk)
  - Phone: 01926 634200

### **Early Help Lead**

- **Beth Sharpe**, (Deputy Head Pastoral)
  - E-mail : [bethsharpe@princethorpe.co.uk](mailto:bethsharpe@princethorpe.co.uk)
  - Phone: 01926 634200

### **Online Safety Officer**

- **Beth Sharpe**, Deputy Head Pastoral and Designated Safeguarding Lead (DSL)
  - E-mail : [bethsharpe@princethorpe.co.uk](mailto:bethsharpe@princethorpe.co.uk)
  - Phone: 01926 634200 or 07391 407551

## Key personnel – Crackley Hall

### Designated Safeguarding Leads

- **Duncan Cottrill**, Deputy Head, is the Designated Safeguarding Lead (DSL)
  - E-mail : [duncancottrill@crackleyhall.co.uk](mailto:duncancottrill@crackleyhall.co.uk)
  - Phone: 01926 514444 or 07587 550168
- **Emma Birch**, Deputy DSL (Nursery Manager)
  - E-mail: [emmabirch@crackleyhall.co.uk](mailto:emmabirch@crackleyhall.co.uk) <mailto:clarebird@crackleyhall.co.uk>
  - Phone: 01926 514444
- **Clare Bird**, Deputy DSL (Nursery Deputy Manager)
  - E-mail: [clarebird@crackleyhall.co.uk](mailto:clarebird@crackleyhall.co.uk)
  - Phone: 01926 514444
- **Victoria Osborn**, DDSL (Holiday Club Manager)
  - E-mail : [victoriaosborn@crackleyhall.co.uk](mailto:victoriaosborn@crackleyhall.co.uk)
  - Phone: 01926 514444
- **David Johnson**, DDSL (Wraparound Care Supervisor)
  - E-mail : [davidjohnson@crackleyhall.co.uk](mailto:davidjohnson@crackleyhall.co.uk)
  - Phone: 01926 514444
- **Rob Duigan**, Head, DDSL
  - E-mail : [robertduigan@crackleyhall.co.uk](mailto:robertduigan@crackleyhall.co.uk)
  - Phone: 01926 514444

### Nominated Safeguarding Trustees

- **Mrs Barbara Forster**, Deputy Nominated Safeguarding Trustee
  - E-mail : [barbaraforster@princethorpe.co.uk](mailto:barbaraforster@princethorpe.co.uk)
  - Phone: 01926 514444
- **Mrs Liz Griffin**, Chair of Trustees, Deputy Nominated Safeguarding Trustee
  - E-mail : [lizgriffin@princethorpe.co.uk](mailto:lizgriffin@princethorpe.co.uk)
  - Phone: 01926 514444

### Looked after children

The designated teacher for children who are looked after by the Local Authority is:

- **Duncan Cottrill**, Deputy Head
  - E-mail : [duncancottrill@crackley.co.uk](mailto:duncancottrill@crackley.co.uk)
  - Phone: 01926 514444 or 07587 550168

### Early Help Lead

- **Duncan Cottrill**, Deputy Head
  - E-mail : [duncancottrill@crackleyhall.co.uk](mailto:duncancottrill@crackleyhall.co.uk)
  - Phone: 01926 514444 or 07587 550168

## Online Safety Officer

- **Duncan Cottrill**, Deputy Head and Designated Safeguarding Lead (DSL)
  - E-mail : [duncancottrill@crackleyhall.co.uk](mailto:duncancottrill@crackleyhall.co.uk)
  - Phone: 01926 514444 or 07587 550168

## Key personnel – Crescent School

### Designated safeguarding leads

- **Alan Webb**, Assistant Head, who is Designated Safeguarding Lead (DSL)
  - Email: [alanwebb@crescentschool.co.uk](mailto:alanwebb@crescentschool.co.uk)
  - Phone: 01788 521595 or 07741 305914
- **Joe Thackway**, Head, who is Designated Deputy DSL (DDSL)
  - E-mail : [joethackway@crescentschool.co.uk](mailto:joethackway@crescentschool.co.uk)
  - Phone: 01788 521595
  -
- **Sam Stapleton**, Head of Wellbeing, DDSL
  - Email: [samstapleton@crescentschool.co.uk](mailto:samstapleton@crescentschool.co.uk)
  - Phone: 01788 521595

### Nominated Safeguarding Trustees

- **Mrs Liz Griffin**, Chair of Trustees, Nominated Safeguarding Trustee for Crescent School
  - E-mail : [lizgriffin@princethorpe.co.uk](mailto:lizgriffin@princethorpe.co.uk)
  - Phone: 01788 521595
- **Mrs Helen Knight** is the Deputy Nominated Safeguarding Trustee for Crescent School
  - Email: [helenknight@princethorpe.co.uk](mailto:helenknight@princethorpe.co.uk) [mailto:](mailto:helenknight@princethorpe.co.uk)
  - Phone: 01788 521595

### Looked after children

The designated teacher for children who are looked after by the Local Authority is:

- **Sam Stapleton**, Head of Wellbeing who is Designated Deputy DSL (DDSL)
  - Email: [samstapleton@crescentschool.co.uk](mailto:samstapleton@crescentschool.co.uk)
  - Phone: 01788 521595

### Early Help Lead

- **Alan Webb**, Assistant Head
  - Email: [alanwebb@crescentschool.co.uk](mailto:alanwebb@crescentschool.co.uk)
  - Phone: 01788 521595 or 07741 305914

## Online Safety Officer

- **Alan Webb**, Assistant Head and Designated Safeguarding Lead (DSL)
  - Email: [alanwebb@crescentschool.co.uk](mailto:alanwebb@crescentschool.co.uk)
  - Phone: 01788 521595 or 07741 305914



## **Key external agencies**

### **Local safeguarding partners:**

Warwickshire County Council (Chief Executive), Clinical Commissioning Group (Accountable Officers) and Warwickshire Police (Chief Constable).

*Covers Leamington Spa, Rugby, Stratford upon Avon and Nuneaton and Bedworth.*

LADO Warwickshire: [lado@warwickshire.gcsx.gov.uk](mailto:lado@warwickshire.gcsx.gov.uk)

Cross border CP cases: <http://apps.warwickshire.gov.uk/api/documents/WCCC-850-45>

**Warwickshire: 01926 410410**

*Other areas:*

Coventry: 02476 788555

Oxfordshire: 01865 815843

Northamptonshire: 03001 261000

Leicestershire: 0116 305 0005

### **Children Missing Education Service**

The Children Missing Education Service (CME) for Warwickshire

Tel: 01926 742036

Email: [carolhattee@warwickshire.gov.uk](mailto:carolhattee@warwickshire.gov.uk)

### **Multi-Agency Safeguarding Hub**

#### **Warwickshire MASH –**

Tel: 01926 414144

Email: [mash@warwickshire.gcsx.gov.uk](mailto:mash@warwickshire.gcsx.gov.uk)

The form can also be completed online.

Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team: 01926 886922.

### **NSPCC whistleblowing helpline**

Address: Weston House, 42 Curtain Road London EC2A 3NH

Tel: 0800 028 0285 between 8.00am and 8.00pm Monday to Friday

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

### **NSPCC report abuse in education advice line**

Tel: 0800 136 663

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

### **Disclosure and Barring Service**

Address: DBS Customer Services, PO Box 3961, Royal Wootton Bassett, SN4 4HF

Tel: 03000 200 190

Email: [customerservices@dbs.gov.uk](mailto:customerservices@dbs.gov.uk)

### **Teaching Regulation Agency**

Address: Teacher Miscount, Ground Floor South, Cheylesmore House, 5 Quinton Road, Coventry, CV1 2WT

Tel: 0207 593 5393

Email: [misconduct.teacher@education.gov.uk](mailto:misconduct.teacher@education.gov.uk)

### **OFSTED Safeguarding Children**

Tel: 0300 123 4666 (Monday to Friday from 8am to 6pm)

Email: CIE [@ofsted.gov.uk](mailto:@ofsted.gov.uk)

## Preventing extremism in schools and children's services

### Department for Education:

Tel non-emergency number: 020 7340 7264

Email: [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk)

### Police:

Emergency: 999

Non-emergency: 101

### Local Authority:

Prevent Lead: Geoff Thomas

Tel: 01926 412016

Email: [geoffthomas@warwickshire.gov.uk](mailto:geoffthomas@warwickshire.gov.uk)

## 4. Roles and Responsibilities

### The Designated Safeguarding Lead (DSL)

The DSL's role is to take lead responsibility for safeguarding and child protection matters in their respective school. The DSL's responsibility is to maintain an overview of safeguarding, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the Foundation's policies and procedures in practice. The DSL will also take lead responsibility for online safety and understanding the filtering and monitoring systems and processes the school has in place. The DSL works with the Trustees to review and update the safeguarding policy.

Where a pupil leaves the school, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) 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. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should 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.

The DSL regularly reviews the Foundation's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services.

During term time, the DSL and/ or a DDSL will always be available (during school hours) for staff in the School to discuss any safeguarding concerns. If a DSL or DDSL is not available in person, they can be contacted using their mobile phone (where provided above). For out of hours/out of term activities, the schools' arrangements, the DSL or DDSL will be available via the emergency phone number published on the school website and contact details of the DSL shared with the MASH.

The DSL or DDSL should liaise with the three safeguarding partners and work with other agencies in line with *WT*. "*NPCC - When to call the police*" can assist the DSL or DDSL understand when they should consider calling the police and what to expect when they do.

The DSL or DDSL will also be responsible for liaising with the senior mental health lead where safeguarding concerns are linked to mental health.

Whilst the Head should ensure that the policies and procedures adopted are understood and followed by all staff, and the Trustees are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated.

Please see **Section 3, Key Contacts** for contact details at the Local Authority. Full details of the DSL's role can be found at Annex C of KCSIE.

### **The Deputy Designated Safeguarding Leads (DDSLs)**

DDSLs are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times. The DDSLs are trained to the same level as the DSLs and in the absence of the DSL, carry out those functions necessary to ensure the on-going safety and protection of pupils. In the event of the long-term absence of the DSL, the DDSLs will assume all of the functions of the DSL.

### **The Trustees**

The Trustees have overall responsibility for facilitating a whole school approach to safeguarding. The Trustees ensure there are appropriate policies and procedures in place (which are transparent, clear and easy to understand for staff, pupils, parents and carers) in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare, which are in accordance with government guidance and reflects the local criteria for action and the local protocol for assessment. This includes ensuring that the Foundation's safeguarding policies are reviewed annually (as a minimum) and updated if needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learned. A review also includes the effectiveness of procedures and their implementation.

### **The Heads**

The Head of each of the Schools:

- ensures, together with the DSL, that the child protection policy and procedures are understood and implemented by all staff;
- allocates sufficient time, training, support and resources, including cover arrangements when necessary, to enable the DSL and DDSLs to carry out their roles effectively;
- supports the designated teacher for looked after (and previously looked after) children to promote the educational achievement of any pupils who are looked after by the Local Authority and ensures that all staff have the skills, knowledge and understanding necessary to keep looked after children safe;
- ensures that all staff understand the whistle blowing procedures and where to find these;
- ensures that pupils are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe at all times including online as part of a broad and balanced curriculum to include Relationships and Sex Education;
- manages all allegations of abuse against staff in accordance with the procedures in this policy.

## **5. Staff code of conduct**

The aim of the Staff Code of Conduct is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with Code of Conduct at

all times. A hard copy is issued to all staff during their induction and it can also be found in the Staff Handbook.

Staff sign annually to say they have read and understood the **Staff Code of Conduct**.

Staff also receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules. (Please also refer to the **ICT Acceptable Use Policy** for staff & pupils.)

Staff found to be in breach of the Staff Code of Conduct may be the subject of a referral to the Designated Officer in the Local Authority and may be subject to disciplinary action.

## **6. Abuse of position of trust**

All Foundation staff are aware that inappropriate behaviour towards pupils is unacceptable and that their conduct towards pupils must be beyond reproach. In addition, staff should understand that, under the Sexual Offences Act 2003, it is an offence for a person over the age of 18 to have a sexual relationship with a person under the age of 18, where that person is in a position of trust, even if the relationship is consensual. This means that any sexual activity between a member of the school staff and a pupil under 18 may be a criminal offence, even if that pupil is over the age of consent.

## **7. Safer recruitment**

The Foundation is committed to safer recruitment processes and ongoing safer working practices to create a culture that safeguards and promotes the welfare of children in the Schools whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the Schools.

Members of teaching and non-teaching staff including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the Schools may undertake an online update check through the DBS Update Service.

Full details of the Foundation's safer recruitment procedures for checking the suitability of staff, Trustees and volunteers to work with children and young people is set out in the **Safer Recruitment Policy**. This policy sets out the procedures from beginning to end of the process for recruiting all staff including details of the required checks. This policy can be found on each School's website.

## **8. Arrangements for visiting speakers**

The Foundation has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable. The Foundation's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of our Schools and British values.

The Schools are required to undertake a risk assessment before agreeing to a visiting speaker being allowed to attend the school. This will take into account any vetting requirements considered appropriate in the circumstances, and may include a DBS check if relevant. The

Schools may also conduct research on the visiting speaker and/or their organisation, as appropriate. The Schools will not use a visiting speaker where any link is found to extremism, such as extremist groups and movements.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the visiting speaker's presentation and/or footage in advance of the session being provided.

Visiting speakers, whilst on school site, will be supervised by a school employee. At no point will a visiting speaker be left unsupervised on School site whilst pupils are present. A member of school staff will be present during the talk, who will monitor what is being said to ensure that it aligns with the values and ethos of the Foundation and British values.

On attending the school, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence. Visiting speakers will also be briefed on the Foundation's Safeguarding Policy and should confirm to the relevant school that they have the appropriate DBS check (unless the visiting speaker's employers have already confirmed that their staff have had the appropriate checks). The school shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The Foundation's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriate supervised is set out on the OFS when booking a visiting speaker.

## **9. Children who may be particularly vulnerable**

Some children are more vulnerable to abuse and neglect than others.

Those who may be particularly vulnerable include those children who are:

- disabled or have special educational needs;
- affected by parental substance misuse, domestic abuse or parental mental health needs;
- asylum seekers;
- looked after (or previously looked after) by the Local Authority or otherwise living away from home;
- vulnerable to being bullied, or engaging in bullying behaviours;
- living in temporary accommodation;
- living in chaotic and unsupportive home situations;
- vulnerable to discrimination and maltreatment on the grounds of race, ethnicity, religion, disability or sexuality;
- at risk of child sexual or criminal exploitation;
- do not have English as a first language;
- at risk of 'honour' based violence, including female genital mutilation (FGM);
- at risk of forced marriage;
- at risk of being drawn into extremism.

This list is not exhaustive.

## **10. Early Help Assessment**

The Foundation recognises that providing early help is more effective in promoting the welfare of children than reacting later. Any child may benefit from early help but all Foundation staff

should be particularly alert to the potential need for early help for a child who:

- is disabled, 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;
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is misusing drugs or alcohol themselves;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
- has returned home to their family from care;
- has a family member in prison, or is affected by parental offending;
- is showing early signs of abuse and/or neglect;
- is at risk of being radicalised or exploited, or is at risk of 'honour' based abuse such as FGM or Forced Marriage;
- has a family member in prison, or is affected by parental offending
- is experiencing, or is at risk of experience, family ostracism
- is absent from education, particularly on repeat occasions and/or prolonged periods (including persistent absences for part of the school day); and
- is a privately fostered child.

Early Help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years.

All school staff are trained to notice any concerns about children, which may help to identify that they would benefit from early help. In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the school's DSL. The DSL will consider the appropriate action to take in accordance with Warwickshire Safeguarding Children Executive referral threshold document. The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under constant review and consideration given to a referral to local authority children's social care if the child's situation does not appear to be improving or is getting worse.

We recognise that children and families may also need support from a wide range of local agencies. Our Schools are committed to working in partnership with children, parents and other agencies to:

- identify situations in which children and/or their families would benefit from early help;
- undertake an assessment of the need for early help, using the CAF process; and
- provide targeted early help support to help address the assessed needs of a child and their family and working with external agencies to develop an action plan that will focus on activity to improve the child's outcomes.

The Early Help process will usually only be effective if it is undertaken with the agreement of the child's parents/carers. Early Help should ideally involve the child and family as well as all the professionals who are working with them. If parents and/or the child do not consent to the Early Help process being initiated, the school will make a judgement about whether, without help, the needs of the child will escalate. If so, a referral into MASH, Multi Agency Support Hub may be necessary.

Please see **Section 3: roles and responsibilities for the individuals trained in the Early Help process for each school.**

## **11. Helping children to keep themselves safe**

*KCSIE* requires the Foundation to ensure that children are taught about safeguarding, including online safety, through teaching and learning opportunities to help children to adjust their behaviours, both inside and outside of school, in order to reduce risks and build resilience.

The Foundation plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection. The Foundation community will therefore:

- establish and maintain an ethos where children feel secure and are encouraged to talk and are always listened to, for example, through our Schools' pastoral support systems and Behaviour and Relationship Policy;
- ensure that all children know that they can approach any adult in each school if they are worried or in difficulty;
- provide Relationships Education to all primary age pupils, and provide Relationships and Sex Education to all secondary age pupils. The Foundation understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, transphobia, biphobia, and sexual violence/harassment. Our Schools will have regard to the DfE's statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching RE and RSE and will ensure the programme is fully inclusive and age and stage appropriate;
- include in the curriculum opportunities during the REAL time programme at Princethorpe and during assemblies, Form Teacher time or PSHE lessons at Crackley Hall and Crescent School to teach children about safeguarding and help them adjust their behaviours (both inside and outside of school), in order to reduce risks and build resilience, including to radicalisation.

The Foundation recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach (to that outlined below) for more vulnerable children, victims of abuse and some SEND children or those with physical health issues might be needed.

Our approach is designed to help children to think about risks they may encounter and, with the support of staff, work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are therefore taught how to conduct themselves and how to behave in a responsible manner.

Children are also reminded regularly about e-safety, the risks of sharing content and images online and tackling bullying, including cyber bullying. Children are also taught about the safe use of electronic equipment and the internet and the risks posed by adults or young people who use the internet and social media to bully, groom, abuse or radicalise people, especially children. It will also include teaching pupils, for example about health relationships, consent and that sexual violence and sexual harassment is always wrong. Further detail on the Foundation's approach to E-Safety is set out in **Section 15** below. That work will include discussions with children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which

is widely referred to as 'sexting'. It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic or sexual relationship and that she or he may do so without any intention to cause harm or distress to anybody. However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern. The Foundation's approach to sexting is set out in **Section 27** below.

## **12. Attendance**

We recognise that full attendance at school is important to the well-being of all our pupils and enables them to access the opportunities made available to them at school. Attendance is therefore monitored closely. Our **Attendance Policy** is set out in a separate document and is reviewed regularly by the Trustees.

## **13. Elective Home Education**

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will try to work together with the local authority and key professionals to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker. The school will inform the local authority of all deletions from the admissions register when a child is taken off roll.

## **14. Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify the local authority children's social care as soon as possible. When the Foundation becomes aware of a private fostering arrangement for a pupil that has not been notified to local authority children's social care, the school will encourage parents and private foster carers to notify local authority children's social care and will share information with local authority children's social care as appropriate.

## **15. E-Safety**

Children and young people commonly use electronic equipment including mobile phones, tablets and computers on a daily basis to access the internet and share content and images via social networking sites such as Facebook, Twitter, MSN, Tumblr, Snapchat and Instagram. Those technologies and the internet are a source of fun, entertainment, communication and education. Unfortunately, however, some adults and young people will use those technologies

to harm children. That harm might range from sending hurtful or abusive texts and emails to grooming and enticing children to engage in sexually harmful conversations, webcam photography or face-to-face meetings. Pupils may also be distressed or harmed by accessing inappropriate websites that promote unhealthy lifestyles, extremist behaviour and criminal activity.

Chatrooms and social networking sites are the more obvious sources of inappropriate and harmful behaviour and pupils are not allowed to access those sites in school. Many pupils own or have access to hand held devices and parents are encouraged to consider measures to keep their children safe when using the internet and social media at home and in the community. The Foundation recognises therefore that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, bully, sexually harass and controls their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected.

Our Schools therefore:

- Liaise with parents to reinforce the importance of children being safe online and the systems the school uses to filter and monitor online use.
- Ensure that internet safety (including when children are online at home) is an integral part of the ICT curriculum and also embedded in REAL time and CORE and Relationships and Sex Education. See [Teaching online safety in schools](#) for further guidance.
- Have appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online, which are regularly reviewed for their effectiveness. Senior leadership teams and relevant staff have an awareness and understanding of these systems and provisions and how to manage these, including escalating concerns to the Designated Safeguarding Lead. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate and harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm.
- Ensure compliance with the DfE's 'filtering and monitoring standards for schools' by;
  - Identifying and assigning roles and responsibilities to manage filtering and monitoring systems
  - Reviewing the filtering and monitoring provision at least annually
  - Blocking harmful and inappropriate content without unreasonably impacting teaching and learning
  - Having effective monitoring strategies in place that meet our safeguarding needs.
- Ensure that school leadership teams and relevant staff have an awareness and understanding of the filtering and monitoring provisions in place and manage them effectively. Staff should escalate concerns when identified using CPOMS.
- Ensure that all staff receive e-safety training and there are e-safety co-ordinators for each school. *Please see **Section 3: Roles & Responsibilities for the e-safety co-ordinator for each school.***
- Ensure that staff receive advice regarding personal online activity, use of social networking and electronic communication with pupils, about which there are strict rules; *please refer to WCC guidance 'Policy on Staff/Governor Use of Social Networking and Internet Sites', the staff code of conduct and ICT Acceptable Uses policy.* (Staff found to be in breach of these rules may be the subject of a referral to the Designated Officer in the Local Authority and may be subject to disciplinary action.)

Further detail of our approach to online safety can be found in the Foundation's **ICT Acceptable Use Policy**, **Mobile Phone Policy** and **Behaviour and Relationship Policy**

which also includes detail on the use of mobile technology in school (and accessing 3G and 4G technology on school premises) and IT arrangements (including filtering and monitoring) to ensure that children are safe from terrorist and extremist material when accessing the internet through school systems. These systems will be reviewed at least annually, supported by an appropriate risk assessment.

The Foundation's **ICT Acceptable Use Policy** for staff and pupils also explains how we try to keep pupils safe in school and protect and educate pupils in the safe use of technology. Cyberbullying and sexting by pupils will be treated very seriously and will be managed through our anti-bullying procedures and our safeguarding procedures where appropriate.

The Foundation recognises the additional risks that children with SEND face online and our Schools work with the Director of Digital Strategy to ensure that additional support and measures are in place to support these children.

## **16. Equality Act 2010**

The Foundation understands and recognises its obligations under the Equality Act and that the Foundation must not discriminate against pupils because of a protected characteristic including sex, race, disability, religion or belief, gender reassignment, pregnancy, maternity, or sexual orientation. In the context of safeguarding, the Foundation will consider how to support pupils with regard to particular protected characteristics in order to meet their specific needs. The Foundation will also consider their duty to make reasonable adjustments for disabled pupils.

## **17. Bullying**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying can have a disastrous effect on a child's well-being and in very rare cases has been a feature in the suicide of some young people. Bullying is discussed through assemblies and Princethorpe's REAL time programme and at Crackley Hall and Crescent School through the PSHE curriculum and assembly programme.

All incidences of bullying, including cyber-bullying and prejudice-based bullying should be reported and will be managed through our **Anti-bullying and Harassment Policy** found on the school's website.

Where an issue of pupil behaviour or bullying gives reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm, staff should follow the procedures below (see **Section 24**) rather than the school's Anti-Bullying and Behaviour policies.

## **18. Behaviour Management and Physical Intervention**

There may be circumstances when it is appropriate for staff to use reasonable force to safeguard children. Foundation staff should only use reasonable force to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. Any physical intervention is down to the professional judgement of the staff member concerned and should always depend on the individual circumstances. Reasonable means using no more force than is needed i.e. it should be proportionate and reasonable and the minimum thought necessary.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned within the context of the law and should always depend on individual circumstances. The Foundation recognises that this is a fine judgement and may be difficult to make in some circumstances. The Foundation also recognises the additional vulnerability when using reasonable force in response to risks

presented by incidents involving children with SEND, mental health or with medical conditions. The Foundation will consider its duties under the Equality Act 2010. Positive and proactive behaviour support, for instance, through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers can reduce the occurrence of challenging behaviour and the need to use reasonable force.

The Foundation's procedures for dealing with allegations of abuse against staff will be followed where an allegation of using excessive force is made against a teacher. Suspension will not be an automatic response when a member of staff is accused of using excessive force. The Foundation will consider whether a teacher has acted within the law when reaching a decision on whether or not to take disciplinary action against the teacher; if staff act in the genuine view that their actions are necessary to prevent harm or significant damage the Foundation is likely to regard their actions as proportionate and reasonable but all the circumstances of the incident will be taken into consideration.

The Foundation does not have a reasonable force policy, however where advice is needed the Warwickshire guidelines are used. Use of reasonable force is covered in the staff safeguarding induction and referred to in the ***Behaviour Policy***.

## **19. Health and Safety, Co-Curricular Activities, Day and Residential Trips**

Our ***Health & Safety Management Policy*** and ***First Aid at Work Policy*** both reflect the consideration we give to the protection of our children both within the school environment and when away from the school when undertaking school trips and visits.

All co-curricular and off-site activities are subject to a risk assessment to satisfy Health and Safety and Safeguarding requirements. When our pupils attend off-site activities, including day and residential visits and work-related activities, we will check that suitable safeguarding arrangements are in place.

Where co-curricular activities are provided by and managed by the Foundation, this Safeguarding Policy and procedures will apply. If other organisations provide services or activities on the school sites during school time, our Schools will check that those organisations have appropriate procedures in place, including safer recruitment procedures.

Further details can be found in the ***Educational Visits Policy***.

## **20. Photography and images**

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place.

To protect pupils, we will:

- seek their parents' consent on admission to the Foundation for certain photographs to be taken or published (for example, on our website or in newspapers or publications), subject to the pupil's data rights to give their own consent;
- ensure pupils are appropriately dressed; and
- encourage pupils to tell us if they are worried about any photographs that are taken of them.

The Foundation has a separate ***Images of Pupils Policy*** which can be found on each of our Schools websites and also in the Staff Handbook on the VLE and also Crackley Hall and Crescent School Teacher Shared area on the intranet.

## 21. Site security

Visitors to the Foundation, including contractors, are asked to sign in and given a visitor's badge which confirms they have permission to be on site. Parents who are simply delivering or collecting their children do not need to sign in. All visitors are expected to observe this Safeguarding Policy and health and safety regulations to ensure children in school are kept safe. The Head will exercise professional judgement in determining whether any visitor should be escorted or supervised while on site.

## 22. Training

Induction and training (including online safety) are in line with Warwickshire Safeguarding advice.

### All Staff (including the Head)

All new staff will be provided with induction training (including online safety) that includes:

- the Foundation's **Safeguarding Policy** (including the policy and procedures to deal with child on child abuse),
- the identity and role of the DSL(s) and DDSL (and other key trained staff)
- the pupil **Behaviour and Relationship Policy** and **Images of Pupils Policy**
- the safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods or children or children missing from education;
- the online safety policy, including an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- the **Staff Code of Conduct** (including the Foundation's whistleblowing procedure and the **Acceptable Use Policy**, low level concerns, online safety, staff/pupil relationships and communications including the use of social media)
- a copy of Part One of *KCSIE* (or for staff who do not work directly with children, Annex A).
- School leaders and staff who work directly with children will also be required to read and sign for Annex B and Part Five of *KCSIE*.

Copies of the above documents are provided to all staff during induction. The **Staff Code of Conduct** can be found in the Staff Handbook. *NB all of the above will be explained before a new member of staff, trustee or volunteer has direct contact with children in school.* Newly qualified teachers receive more detailed training on safeguarding as part of their induction programme when they enter the Foundation.

Supply staff, temporary staff and contractors are given the Staff Code of Conduct on arrival and informed who the DSL (and DDSL) is and how to contact them and are given a safeguarding briefing by the DSL or DDSL.

Volunteers are provided with a safeguarding induction and a copy of the *KCSIE* and Staff Code of Conduct.

As part of the whole school safeguarding approach, all staff are also required to:

- Read and understand Part One (or Annex A, if appropriate<sup>1</sup>) of *KCSIE* and confirm that they have done so via a signed form. Each time Part One/Annex A of *KCSIE* is updated by the Department for Education, staff will be informed and updated on any changes by the DSL at staff meetings or during INSET.

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<sup>1</sup> The DSL will inform staff which they are required to read. Staff that do not directly work with children may read Annex A.

- Understand key information contained in Part One (or Annex A, if appropriate) of *KCSIE*. The Foundation will ensure staff understanding by completing an online child protection module through an appropriate training provider. Staff will also be given a copy of *KCSIE* and Staff Code of Conduct.
- Receive training in safeguarding and child protection regularly (including at INSET days), in line with advice from the WLCSE. Training will include online safety (including the expectations, applicable roles and responsibilities in relation to filtering and monitoring) and harmful sexual behaviours including sexual violence and sexual harassment between children. It will also include *Prevent* awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help. All staff will also be made aware of the local early help process and understand their role in it.
- Undertake regular informal updates, at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively. The Schools provide these via, for example, via staff meetings.
- Receive training on the Foundation's photographic images policy.
- Complete online training on *KSCIE* annually.

It is important that all staff have training to enable them to recognise the possible signs of abuse and neglect and exploitation and to know what to do if they have a concern. All staff are made aware of the increased risk of abuse to certain groups, including disabled and SEN children, looked after children, young carers and risks associated with specific safeguarding issues including child sexual exploitation, extremism, female genital mutilation and forced marriage.

## **Trustees**

All Trustees will receive appropriate safeguarding and child protection (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the Schools are effective and support the delivery of a robust whole school approach to safeguarding. Their training is regularly updated.

The Trustees are aware of their obligations under the Human Rights Act 1998 (in so far as it applies to our Schools), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the ECHR Convention.

## **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children susceptible to radicalisation, supporting SEND children particularly when online, overseeing online safety in school, record keeping and promoting a culture of listening to children, training in the local safeguarding partners approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are regularly refreshed, and at least annually, to keep up with any developments relevant to their role. The refresher training is annually delivered by Warwickshire County Council's Education Safeguarding Service. That training will include up to date information about local safeguarding partners. The DSL will also be supported to access Warwickshire Safeguarding inter-agency training as part of their continuing professional development. The Foundation will also support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure.

All DDSLs are trained to the same level as the DSLs.

### **23. Staff reporting directly to child protection agencies**

Staff should follow the reporting procedures in this policy. Staff may refer directly with local authority children's social care and/or the Police if:

- in exceptional circumstances the DSL, the DDSL, the Head and/or the Chair of Trustees are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety; and/or
- for any other reason they make a judgement that a direct referral is in the best interests of the child.

However, staff should inform the DSL and/or Head at the earliest opportunity of the action taken. If in any doubt, members of staff may consult the MASH or seek support from the Education Safeguarding Manager.

See **Section 3, Key Contacts** for contact details.

### **24. Support for pupils, families and staff**

All safeguarding concerns, allegations and incidents can be devastating for the child concerned and can also result in distress and anxiety for staff who become involved. We will support pupils, their families, and staff by:

- taking all suspicions and disclosures seriously;
- nominating a link person (usually the DSL) to be the central point of contact;
- where a member of staff is the subject of an allegation made by a pupil, separate link people will be nominated to avoid any conflict of interest;
- responding sympathetically to any request from pupils or staff for time out to deal with distress or anxiety;
- maintaining confidentiality and sharing information on a need-to-know basis only with relevant individuals and agencies;
- storing records securely;
- offering details of helplines, counselling or other avenues of external support;
- following the procedures laid down in our safeguarding, whistleblowing, complaints and disciplinary procedures;
- co-operating fully with relevant statutory agencies.

### **25. Safeguarding procedures<sup>2</sup>**

The Foundation has a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the

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<sup>2</sup> In our procedures we may use the terms 'victim' alleged perpetrator(s)' and where appropriate 'perpetrator(s)'. Although widely recognised and understood terms, the Foundation recognise the importance of care when using these terms in managing an incident; the use of appropriate terminology will be determined, as appropriate, on a case-by-case basis.

welfare of children is everyone's responsibility. The Foundation adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process, procedure and policy development.

Our Schools have arrangements for listening to children and providing early help and processes for children to raise concerns about themselves or their peers. Details of these arrangements can be found in the following:

- ***Behavioural and Relationship Policy;***
- ***Anti-Bullying and Anti-harassment Policy;***
- ***Staff Code of Conduct.***

Staff should expect to support social workers and other agencies following any referral.

### **Recognising abuse**

*Staff are referred to Appendix 2 and Annex B of KCSIE which provides further information about specific forms of abuse and safeguarding issues.*

To ensure that our pupils are protected from harm, we need to exercise professional curiosity and understand what types of behaviour constitute abuse and neglect and their indicators. All Foundation staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events that can be covered by one definition or label. They can occur from within or outside families, in or out of school, from within peer groups or the wider community and/or online. In most cases, multiple issues will overlap with one another and children can therefore be vulnerable to multiple threats.

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments. All staff, but especially the DSL 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 (including teenage relationships abuse), criminal exploitation, county lines, radicalisation and serious youth violence.

Abuse is 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 (e.g. via the internet). Abuse and other risks can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers 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.

**In all cases, if staff are unsure, they should always speak to the DSL (or DDSL).**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## Taking action

Any child in any family in any school could become a victim of abuse. Staff should always maintain an attitude of “It could happen here”.

Key points for staff to remember when taking action are:

- in an emergency take the action necessary to help the child, for example, call 999;
- **if you suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, act immediately and follow the procedures below;**
- do not start your own investigation;
- share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family;
- complete a record of concern, using a Form C (Green form); and
- seek support for yourself if you are distressed or need to debrief.

### A) Procedures for dealing with concerns about a child

If staff (including trustees, agency staff and volunteers) have any concerns about a child's welfare (which may include that they suspect or hear an allegation or complaint of abuse or neglect from a child or any third party), they must act immediately and follow the relevant procedure below. Options will then include:

- managing any support for the child internally via the school's own pastoral support processes;
- undertaking an early help assessment; or
- making a referral for statutory services.

If, in exceptional circumstances, the DSL or DDSL is not available to discuss safeguarding concerns, this should not delay appropriate action being taken and staff should consider speaking to a member of the senior leadership team and/or take advice from local authority children's social care. In these circumstances, any action taken should be shared with the DSL or DDSL as soon as is practically possible. Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

When hearing concerns/allegations, all staff should:

- listen carefully and allow them to speak freely;
- remain calm and not overreact – the pupil may stop talking if they feel they are upsetting their listener;
- give reassuring nods or words of comfort – ‘I want to help’, ‘You are doing the right thing in talking to me’;
- not be afraid of silences – staff must remember how hard this must be for the pupil;

- under no circumstances ask investigative and leading questions – such as how many times this has happened, whether it happens to siblings too, or what does the pupil's mother think about all this; however, it is reasonable to ask questions to clarify understanding and to support a meaningful referral if that is required, e.g. when did this happen, where did this happen? be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful e.g. children may feel embarrassed or could be vulnerable due to their SEND or language barriers. Staff should exercise professional curiosity and speak to the DSL if they have concerns;
- reassure the individual that the allegation/complaint will be taken seriously, that they will be supported and kept safe. In order to help them, the member of staff must pass the information on. It is important not to guarantee absolute confidentiality as this may not be in the best interests to the child;
- ensure that the individual is not made to feel ashamed for making the report or given the impression that they are creating a problem by reporting any form of abuse and/or neglect;
- not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused;
- avoid admonishing the child for not disclosing earlier. Saying things such as 'I do wish you had told me about this when it started' or 'I can't believe what I'm hearing' may be the staff member's way of being supportive but may be interpreted by the child to mean that they have done something wrong;
- tell the pupil what will happen next and who the information will be passed to;
- let them know that someone (either you or another named person, e.g. the DSL) will come to see them before the end of the day;
- report verbally to the DSL;
- write up their conversation as soon as possible on the record on Form C (Green form) and hand it to the DSL;
- determine how best to build trusted relationships with children and young people which facilitate communication; and
- seek support if they feel distressed or need to debrief.

The Schools operates its processes with the best interests of the pupil at their heart. Where there is a safeguarding concern, the school will ensure the pupil's wishes and feelings are taken into account wherever possible and will work with them (and their families where appropriate) when determining what action to take and what services to provide. This is particularly important in the context of harmful sexual behaviours, such as sexual harassment and violence. Our Schools manage this by using restorative practices and procedures identified in the Behaviour policy. Anti-bullying policy systems are in place for children to safely express their views and give feedback, to confidentiality report abuse (knowing that their concerns will be treated seriously) and there is provision in place to support dialogue with pupils with communications difficulties or vulnerabilities.

All concerns about a child's welfare and child protection referrals made under the procedures below, unless otherwise stated, should be made to local authority children's social care via the Multi-Agency Safeguarding Hub (MASH) by completing a Multi-Agency Referral Form (MARF) and submitting it to the MASH at [mash@warwickshire.gcsx.gov.uk](mailto:mash@warwickshire.gcsx.gov.uk). The form can also be completed online.

Where a child is suffering, or is likely to suffer from harm, a referral should be made immediately and should be made in the first instance by telephoning the MASH (and the police if appropriate). This should be followed by submission of a MARF (as above). Outside of office hours, immediate concerns about a child should be referred to the Emergency Duty Team.

## **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. Our Schools will as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. Our Schools will share as much information with local authority children's social care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **B) What staff should do if they have concerns about a child**

If staff (including governors/trustees, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to local authority children's social care (via MASH). As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL (or the person that made the referral) should consider following local escalation procedures to ensure their concerns have been addressed and to ensure the child's situation improves. Staff should challenge any inaction and follow this up with the DSL and local authority children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

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

If staff (including governors/trustees, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm they should make an **immediate** referral to local authority children's social care (via MASH) and/or the Police in accordance with WSCE referral process. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent is not needed for referrals to statutory agencies such as the police and local authority children's social care.

If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and local authority children's social care as appropriate.

### **D) What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the Foundation's normal referral processes when there are concerns about children who may be susceptible to extremist ideology and radicalisation, as set out above. This may include a Prevent referral or referral to local authority children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call 999 or submitting a referral form to MASH or call them directly. Advice and support can also be sought from local authority children's social care.

The Schools, in recognition that pupils may be susceptible to being drawn into terrorism or other forms of extremism, carries out appropriate risk assessments (following consultation with

local partners, such as the Police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and Trustees responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

#### **E) What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the Police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve local authority children's social care as appropriate. Staff are referred to Appendix 2 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

#### **F) What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to local authority children's social care (via MASH).

#### **G) How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions, in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.

The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" (December 2020) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.

- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keep them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as local authority children's social care and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the Foundation's Safeguarding and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to local authority children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. The Schools will record the reason for not reporting incidents externally and ensure it is signed off by the relevant Head. Records will be kept in line with statutory requirements set out in *KCS/E* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the Police as a matter of urgency.

#### **H) What staff should do if a child is absent from education**

A child who is absent from education, particularly on repeat occasions and/or prolonged periods (including persistently for parts of the school day), and children missing education, can be a vital warning sign of a range of safeguarding possibilities, such as abuse, neglect and sexual and criminal exploitation – particularly county lines. Where reasonably possible our Schools hold more than one emergency contact number for each pupil so additional options are available to make contact with a responsible adult when a child is repeatedly absent and/or absent for prolonged periods is also identified as a welfare and/or safety concern.

Our Schools response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. Staff must follow the Foundation's procedures for dealing with children who are absent, repeatedly and/or for prolonged periods, and children missing education (see the Foundation's ***Missing Child Policy***).

School attendance registers are carefully monitored to identify any trends. The DSL will monitor unauthorised absence and take appropriate action, particularly where children go missing on repeated occasions and/or are missing for periods during the school day. All unexplained or unauthorised absences will be followed up in accordance with our ***Attendance Policy*** and ***Missing Child Policy***. Action should be taken in accordance with this Safeguarding Policy if any absence of a pupil from the school gives rise to a concern about their welfare.

Our Schools will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more. The Foundation follows the DfE legal requirements for schools in respect of recording and reporting of children who leave school without any known destination.

When working with local authority children's services where school absence indicates safeguarding concerns our Schools will have regard to the non-statutory DfE guidance '*Working together to improve school attendance*'.

Our Schools will inform the Local Authority of any pupil of compulsory school age who is going to be added to or deleted from the admission register at non-standard transition points on one of the grounds set out in Education (Pupil Registration) (England) Regulations 2006 as amended. Our Schools will notify the Children Missing Education ('CME') Officer in the Local Authority as soon as the grounds for deletion are met and no later than the time at which the pupil's name is removed from the register.

It is essential for our Schools to comply with these duties as it will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect or radicalisation.

*Please see **Section 3: Key Contacts** for contact details of the Children Missing Education Service.*

Deletions from roll agreed with the CME Officer will normally be backdated to the first day of absence. If the CME Officer is able to contact the pupil and her/his parents, arrangements will be made with the school and family for a return to education, including a re-integration programme where necessary. If the pupil has registered at another school, the school will delete the child's name from our roll and transfer the child's educational records to the new school in the normal way. Any child protection records will be transferred separately and securely for the attention of the DSL in the new school and a receipt secured.

### **Children who run away or go missing from home or care - Return Home Interviews**

All our Schools will work closely with their local authorities to support pupils who run away or go missing, including facilitating Return Home Interviews (both in terms of releasing the young person from their normal timetable to participate in an interview and in providing an appropriate and safe space on school site for the interview to take place). Our Schools will check with the Local Authority whether or not parents/carers have given their consent to such interviews. However, young people aged 16 and 17 years old are generally considered to be able to consent and withhold consent to their own information being shared and therefore to participate in a RHI or not. If the Local Authority has not received consent from parents/carers and the young person is not assessed as being capable of giving or withholding informed consent, our Schools will contact the parent/carer and seek to secure their consent. Parents/carers may also choose to accompany their son/daughter in interviews and the school/college will facilitate that as appropriate.

*DfE 'Statutory guidance on children who run away or go missing from home or care' (January 2014) provides further information on the steps local authorities and their partners should take to prevent children from doing missing and to protect them when they do. This guidance complements *Working Together* guidance and '*Children missing education: statutory guidance for local authorities*' (September 2016).*

#### **I) What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

#### **J) What staff should do if a child requires mental health support**

Our Schools have an important role to play in supporting the mental health and wellbeing of our pupils. 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. Our Schools aim to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils.

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing and resilience among young people.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken and staff should speak to the DSL or a DDSL.

#### **K) What staff should do if they have a safeguarding concern or an allegation about another staff member (including supply staff, volunteers and contractors)**

If staff have a safeguarding allegation or concern (no matter how small) about another staff member (including supply staff, agency staff, contractors and volunteers) - including what may seem minor contraventions of the Staff Code of Conduct – then this should be referred to the Head. This may include concerns within and outside the workplace (including online). Where there are concerns/ allegations about the Head, this should be referred to the Chair of Trustees. In the event of concerns/allegations being made the procedures set out in **Section 26** will be followed. Staff may also report concerns about suspected abuse or neglect directly to MASH, Multi Agency Support Hub or the Police if they believe direct reporting is necessary to secure action and immediate action needs to be taken.

If staff have a safeguarding concern or an allegation about another member of staff (including supply staff, volunteers or contractors) that does not meet the harm threshold, then this should be shared in accordance with the low-level concern procedures below.

#### **L) What staff should do if they have safeguarding concerns about safeguarding practices**

Where staff have concerns about poor or unsafe practices and potential failures in the school's safeguarding regimes, these should be raised in accordance with the Foundation's whistleblowing procedures which can be found in the Staff Handbook of the VLE and also on Teacher Shared area on the intranet at Crackley Hall and Crescent School. It enables staff to

raise concerns or allegations, initially in confidence and for a sensitive enquiry to take place. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the school, feel that their genuine concerns are not being (or have not been) addressed or are concerned about the way a concern is being handled, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. General guidance on whistleblowing can be found via: [Advice on Whistleblowing](#) and the [NSPCC's what you can do to report abuse dedicated helpline](#).

*For contact details please see **Section 3, Key Contacts**. Contact numbers for Local Authority Children's Social Care, the Police and the LADO and the NSPCC whistleblowing helpline are also displayed in the staff room.*

## **26. Child on Child Abuse and Harmful Sexual Behaviour**

Children may be harmed by other children or young people. Staff will be aware of the harm caused by bullying behaviour and will use the school's Anti-Bullying and Behaviour policies and procedures where necessary. However, there will be occasions when a pupil's behaviour warrants a response under these procedures: where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the Anti-Bullying and Behaviour policies in the first instance.

Child-on-child abuse is never acceptable: the Foundation has a zero-tolerance approach to abuse. Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future. Abusive behaviour should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys", as this can lead to a culture of unacceptable behaviours (with children not coming forward to report it) and an unsafe environment. Staff will also challenge physical behaviours (that are potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Child-on-child abuse can be associated with factors outside the school and can occur online and face to face and between two or more children of any age or gender. Our Schools therefore take a contextual safeguarding approach to managing child-on-child abuse.

Our Schools have procedures in place to minimise the risk of child-on-child abuse, including giving robust advice to pupils, providing adequate supervision and broadly in the provision of pastoral care appropriate to the needs of the pupils. Our Schools will also ensure that children are aware of how they can report abuse, and that they are aware of the procedures that will be followed once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The arrangements and procedures below apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously. Even if there are no reports in school it does not mean child-on-child abuse is not happening; it may be the case that it is just not being reported. If staff have any concerns regarding child-on-child abuse they should speak to the DSL (or DDSL).

## **What to do if staff suspect that a child may be at risk or hears a report of child-on-child abuse**

Our Schools recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust. Our Schools also recognise that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the procedures with regards to child-on-child abuse (as detailed below) and can recognise the indicators and signs of child-on-child abuse and know how to identify it and how to respond to reports. Staff must act immediately and support the victim when they raise a concern.

The Foundation recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern

Even if there are no reports in school, it also 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, or where child-on-child abuse is disclosed to them, they should follow the safeguarding procedures using the Green Form and speak to the DSL (or DDSL) without delay.**

All staff are trained to manage a report. Effective safeguarding practice (including for responding to child-on-child violence and sexual harassment) includes:

- if possible, managing reports with two members of staff present, (preferably one of them being the DSL or a DDSL). However, this might not always be possible;
- not promising confidentiality as it is very likely a concern will have to be shared further (for example, with the DSL or local authority children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
- recognising that a child is likely to disclose to someone they trust: this could be **anyone** on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
- recognising that a first disclosure may only be the first incident reported; it is not necessarily representative of a singular incident. It is therefore important to take all reports of abuse seriously regardless of how long it has taken for the child to come forward;
- listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about how the report will be progressed, not asking leading questions (although staff can ask children if they have been harmed and what the nature of that harm was);
- keeping in mind that certain children may face additional barriers to telling someone because of their disability, sex, ethnicity and/or sexual orientation;
- waiting until the end of the report and immediately write up a thorough summary. It may be appropriate to make notes during the report, however, if making notes, staff should be conscious of the need to remain engaged with the child;
- only recording the facts as the child presents them;

- where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and UKCIS guidance on *Sharing nudes and semi-nudes: advice for education settings working with children and young people*<sup>3</sup>;
- informing the DSL (or DDSL), as soon as practically possible, if the DSL (or DDSL) is not involved in the initial report.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be considered in the wider context in which it may have occurred. All children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. **Immediate** consideration will therefore be given as to how best to support and protect all children involved/impacted.

As part of this, the school will take into account the views of the child/children affected. The victim may ask the school not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider: parents or carers should normally be informed unless doing so would put the victim at greater risk; the basic safeguarding principal that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care; and whether a crime has been committed. Ultimately, the DSL or DDSL will balance the victim's wishes against their duty to protect the victim and other children. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the Pastoral and Safeguarding team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. We recognise that children with special educational needs and disabilities or certain health conditions can be more prone to child-on-child group isolation or bullying (including prejudice-based bullying) than other children. The school will provide extra pastoral support for those children; this additional support will be delivered by a member of the learning support team. We also recognise that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

A pupil against whom an allegation of abuse has been made may be suspended from the school during an investigation. The relevant school will take advice from the WSCE on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged "victim" and "perpetrator". If it is necessary for a pupil to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to the advice of the WSCE, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the WSCE and/or Police as appropriate.

### **Reports concerning harmful sexual behaviour**

The approach detailed immediately above for responding to reports should be followed. Where a report concerns an allegation of sexual violence and/or sexual harassment, if possible two

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<sup>3</sup> Consensual image sharing, especially between older children of the same age, may require a different response. Whilst not abusive, children still need to know it is illegal, whilst non-consensual sharing is illegal and abusive.

members of staff should be present when managing the report (preferably one of them being the DSL or DDSL).

Consideration of safeguarding all those children involved will be immediate. Following a report of sexual violence and/or sexual harassment the DSL will therefore consider the appropriate response. This will include considering:

- the wishes of the victim in terms of how they want to proceed,
- the nature of the alleged incident, including whether a crime may have been committed and/or whether HSB has been displayed,
- the ages of the children involved,
- the developmental stages of the children involved,
- any power imbalance between the children,
- if the alleged incident is a one-off or sustained pattern (noting that sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature),
- that sexual violence and sexual harassment can take place within intimate personal relationships between children;
- any ongoing risks to the victim, other children, adult students, or school/college staff;
- Importance of understanding intra familial harms and any necessary support for siblings following incidents;
- other related issues and wider context (such as that such abuse can take place within intimate personal relationships between peers, or any links to CSE/CEE) .

When there has been a report of sexual violence, the DSL or DDSL should make an immediate risk and needs assessment in respect of each child affected by the abuse. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the “victim” (especially their protection and support);
- whether there have been any other victims;
- the alleged “perpetrator”;
- all other children (and, if appropriate, staff) at the school, especially if actions that are appropriate to protect them from the alleged perpetrator(s), or future harms; and
- the time and location of the incident, and any action required to make the location safer.

The DSL will consider as part of the School’s response, the context within which such incidents and/or behaviours occur and the importance of anonymity. Risk assessments will be recorded (either written or electronic) and kept under review. Any response and action will, as always, have at the centre the best interests of the child. The DSL will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised. The DSL will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them.

The DSL will consider the risks posed to all pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include consideration of the proximity of the “victim” and alleged “perpetrator” and considerations regarding shared classes, sharing school premises (including during any before or after school activities) and school transport. The school will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support. The DSL will also consider intra familiar harms and whether any support for siblings is necessary following an incident, and the part social media may play in such incidents (e.g. those involved could

harass or bully or be subjected to harassment or bullying). Any professional risk assessment will inform the school's approach.

The management of children and young people with sexually harmful behaviour is complex and the Foundation will work with other relevant agencies to maintain the safety of the whole community. The police may be informed of any harmful sexual behaviours including sexual violence and sexual harassment which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will usually be passed to the police. A report to the police will generally be made in parallel with a referral to local authority children's social care. Where a report has been made to the police, the school should consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. The school should also discuss the best way to protect the victim and their anonymity. If the DSL decides to make a referral to local authority children's social care, MASH Multi Agency Hub and/or a report to the police against a "victim's" wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help.

In circumstances where a child displays sexualised inappropriate behaviour but evidence of sexual harm towards other children is not clear cut, the DSL may seek consultation and advice from Sexualised Inappropriate Behaviours Service and/or the Education Safeguarding Manager. In deciding the most appropriate response, relevant considerations will include:

- the nature and extent of the inappropriate/abusive behaviours. In respect of sexual abuse, it is necessary to distinguish between normal childhood sexual development and experimentation; and sexually inappropriate or aggressive behaviour;
- the context of the abusive behaviours;
- the child/young person's development, family and social circumstances;
- the need for services, specifically focusing on the child/young person's harmful behaviour as well as other significant needs; and/or
- the risks to self and others, including other children in the school, household, extended family, peer group and wider social network.

The DSL or DDSL will also work closely with local authority children's social care and other agencies as required to ensure any action taken under this policy (including any disciplinary measures) does not jeopardise any statutory investigation and to discuss how the alleged "perpetrator", staff, parents and others will be informed of the allegations and what information can be disclosed bearing in mind the need to protect those involved and their anonymity.

Regardless of the outcome of any criminal process, including where a child is subject to bail, the DSL will liaise with the police and local authority children's social care to ensure the welfare and safety of all children (including the suspected person) and update the risk assessment and ensure relevant protections and measures are in place for all children to manage any assessed risk of harm that may arise within the school.

In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the school's behaviour policy. The school will also consider whether disciplinary action may be appropriate for any other child/children involved. Before deciding on appropriate action the school will always consider its duty to safeguard all children from harm; the underlying reasons for a child's behaviour; any unmet needs, or harm or abuse suffered by the child; the risk that

the child may pose to other children; and the severity of the child-on-child abuse and the causes of it. Any disciplinary action and providing appropriate support are not mutually exclusive; they can occur at the same time.

The Foundation is committed to participating in plans both to provide pupils who are at risk from other children and those pupils who may present a risk to other children with appropriate services to address any concerns and, wherever possible, to facilitating on-going access to education in school for all children concerned, subject to appropriate risk assessments and risk management plans.

Exclusion will only be considered as a last resort and only where necessary to ensure the safety and wellbeing of the other children in the school.

The DSL will ensure that where children move to another educational institution following an incident of child-on-child abuse, the new institution is made aware of any ongoing support needs and, where appropriate, any potential risks to other children and staff.

The school will also be informed by the Police or MASH, Multi Agency Support Hub about referrals made directly to those agencies from other sources (e.g. family members, family friends, parents of other children) in relation to alleged sexualised inappropriate or sexually abusive behaviour displayed by pupils inside and/or outside school. In all such circumstances, the school may be required to attend a strategy meeting under multi-agency child protection procedures in order to facilitate risk management and planning with other agencies.

In responding to cases involving children or young people who have committed sexually abusive behaviours, local authority children's social care will consult with the Sexualised Inappropriate Behaviours Service (SIBS), for advice, consultation or provision of a direct service. A wide range of practice guidance, knowledge and therapeutic materials has been developed by SIBS to inform the interventions relating to children and young people with sexual behaviour difficulties. Such support may include early help.

### **Records of concerns, discussions and decisions made**

The school will keep a written record of all concerns, discussions and decisions made, and will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the school's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the school will decide on an appropriate course of action. Consideration should be given as to whether there are wider cultural issues within the school that enabled the inappropriate behaviour to occur and where appropriate extra teaching time and/or staff training could be delivered to minimise the risk of it happening again.

## **27. Allegations of abuse procedures**

### **A) Arrangements for dealing with safeguarding concerns or allegations of abuse about teachers and other staff (including the Head, DSL, supply staff and volunteers)**

The Foundation's procedures for managing concerns/ allegations against staff (including supply staff, contractors and volunteers) who are currently working in our Schools whether in a paid or unpaid capacity follows Department for Education statutory guidance and local safeguarding partners arrangements and applies when Foundation staff (including supply staff and volunteers) have (or are alleged to have):

- behaved in a way that has harmed a pupil, or may have harmed a pupil;
- possibly committed a criminal offence against or related to a pupil;

- behaved towards a pupil in a way that indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- behaved or may have behaved in a way that indicated they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harms test should be dealt with using the procedure for handling low level concerns set out below.

Allegations against an adult who is no longer working/volunteering/teaching should be referred to the Police. Where it is known that the adult is still working/volunteering/teaching with children, all allegations (including historical/non-recent allegations of abuse) should be referred to the Police and the designated officer in the local authority that the adult is working/volunteering.

Where an adult makes an allegation to the school that they were abused as a child, they should be advised to report the allegation to the police. Non-recent allegations made by a child, should be reported to the designated officer in line with the local authority's procedures for dealing with non-recent allegations. Abuse can be reported no matter how long ago it happened. The designated officer will coordinate with local authority children social care and the police.

If an allegation is made against anyone working with children in the school, before contacting the designated officer, the school will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The school should not undertake their own investigation of allegations without prior consultation with the Local Authority 'designated officer' or, in the most serious cases, the Police, so as not to jeopardise statutory investigations. In borderline cases, the school may discuss informally with the 'designated officer' on a no-names basis.

When dealing with allegations about a staff member the school will apply common sense and judgment, deal with allegations quickly, fairly, and consistently and will support the person subject to the allegation.

1. All concerns and allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Head. Where the Head is absent or is the subject of the allegation or concern, reports should be made to the Chair of Trustees. Where the Head is the subject of the allegation or concern, the Head must not be informed of the allegation prior to contact with the Chair and designated officer who is Warwickshire's Education Safeguarding Children's Manager (via Warwickshire MASH or the Multi-Agency Safeguarding Hub). The school will not take action before consulting the designated officer. If the Chair of Trustees is absent the Deputy Chair of Trustees will assume role of Chair. However, staff may consider discussing any concerns with the DSL and make any referral via them.
2. The case manager should immediately (within 24 hours) discuss the allegation with the designated officer and consider the nature, content and context of the allegation and agree a course of action including any involvement of the Police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager may involve the Police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The designated officer should be informed within one working day of all allegations that come to the school's attention and appear to meet the criteria or that are made directly to the Police and/or local authority children's social care. The DSL is responsible for ensuring the child is not at risk.

3. Where the case manager is concerned about the welfare other children in the community, or the member of staff's family, they will discuss these concerns with the designated officer and make a risk assessment of the situation. It may be necessary for the designated officer to make a referral to local authority children's social care.
4. Before contacting the designated officer, the school should conduct basic enquiries in line with local procedures to establish the facts and help determine if there is any foundation to the allegation, being careful not to jeopardise any future police investigation, such as:
  - Was the individual in the school at the time of the allegation?
  - Could they have come into contact with the child?

The Schools should establish what initial information the designated officer will require, and if in doubt check with the designated officer before undertaking any initial enquiries, to ensure not to prejudice the position.

5. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the designated officer, and if appropriate, the police and/or local authority children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action, unless there is an objection by local authority children's social care or the Police. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.
6. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension or whether alternative arrangements should be put in place until the allegation is resolved. Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the school is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the designated officer, their HR advisor and *WT* and *KCSIE* (including the alternatives referenced a paragraph 381), as well as the police and local authority children's social care (if relevant) when making a decision about suspension. Where the individual is suspended, the case manager will confirm the decision within one working day and will ensure they know who their point of contact is in the school and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.
7. The Foundation has a duty of care to its staff, so whilst the welfare of the child is paramount, appropriate welfare support should also be made for the member of staff. Information is confidential, and should not ordinarily be shared with other staff, children or parents not directly involved. See further guidance in *KCSIE* (paras 386-387).
8. Where further enquiries are required to enable a decision about how to proceed, the designated officer and case manager should discuss how and by whom the investigation will be undertaken. This may be by a senior member of staff, unless the nature or complexity of the allegation requires an independent investigator to be appointed to undertake the investigation.
9. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from local authority children's social care or the Police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

10. The case manager will monitor progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair way. Reviews are conducted at fortnightly (and no longer than monthly) intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
11. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious (sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).
12. The case manager will discuss with the designated officer whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed (including by an agency) or the school (or agency) ceases to use their services, or the person resigns or otherwise ceases to provide their services
  - a. The school has a legal requirement to promptly make a referral to the DBS any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the person has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity (or would have removed an individual had they not left).
  - b. Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.
  - c. Further or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
13. Where initial discussions lead to no further action, the case manager and the designated officer should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom.
14. On conclusion of the case, the case manager should review the circumstances of the case with the designated officer to determine whether there are any improvements to be made to the school's safeguarding procedures or practices to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The designated officer and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual. For all other cases where the allegation is concluded to be either, unfounded, false,

malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

15. **Settlement:** Compromise or settlement agreements **should not** be used where there are allegations which indicate the person poses a risk of harm or may not be suitable to work with children, and will not prevent a police and/or school investigation, or referral to the DBS or TRA where the criteria are met. Schools should check the relevant provisions of KCSIE (401 - 413-).
16. Any incidents will be followed by a review of the Safeguarding procedures within the Foundation, with a report being presented to the Trustees without delay.

#### **B) Arrangements for dealing with safeguarding concerns or allegations of abuse about supply teachers and contractors**

The procedures for managing allegations against staff above also apply to staff not directly employed by the Foundation, for example, supply teachers provided by an employment agency or business ('the agency'). The Foundation will usually take the lead but agencies should be fully involved and co-operate in any enquiries from the designated officer, police and/or children's social services. Agencies should be fully involved and cooperate with any enquiries from the LADO, police and/or local authority children's social care.

In no circumstances will the Foundation decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the designated officer to determine a suitable outcome. The Foundation will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The Foundation will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the designated officer should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the Foundation during the investigation.

When using an agency, the Foundation should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the 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, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

#### **C) Arrangements for dealing with safeguarding concerns or allegations of abuse about Trustees**

If an allegation is made against a trustee, the Foundation will follow its local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

#### **D) Arrangements for dealing with low level concerns or allegations about teachers and other staff (including the Head, DSL, Trustees, supply staff, contractors and volunteers)**

Our Schools recognise that addressing low-level concerns is important to create and embed a culture of openness, trust, and transparency in which our School's values and expected behaviour of its staff are constantly lived, monitored, and reinforced by all staff. As such, as part of the whole school approach to safeguarding, the Foundation will ensure the promotion of an open and transparent culture in which **all** concerns (no matter how small) or allegations that do not meet the harms threshold about all adults working in or on behalf of the Schools (including supply teachers, volunteers, Trustees and contractors) are dealt with promptly and appropriately.

A low-level concern is any concern 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
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Examples of such behaviour could include, but are not limited to:

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

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours). Such concerns may arise in several ways and from a number of sources e.g. from a child, parent, member of staff or as a result of vetting checks undertaken.

It is crucial that any such concerns, including those which do not meet the allegation/harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately.

Reporting concerns:

Staff must share all concerns with the DSL (or a DDSL) without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner by the Head. Where a low-level concern is raised about the DSL, it should be shared with the Head. If the low-level concern relates to the Head or the Head's partner or child, it should be shared with the Chair of Trustees.

The DSL/Head should:

- speak to the person who raised the concern (unless it has been raised anonymously);

- review the information and determine whether the behaviour is entirely consistent with the Staff Code of Conduct and the law, constitutes a low-level concern, (is serious enough to consider a referral to the LADO, or 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;
- **where the DSL/Head is in any doubt whatsoever, they should seek advice from the LADO;**
- 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).

Any investigation of low-level concerns should be done discreetly and, on a need-to-know basis. The Head is the ultimate decision-maker in respect of all low-level concerns, except where the concern relates to the Head (in which case the Chair is the ultimate decision-maker). Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately.

When a low-level concern has been raised by a third party, the DSL should collect as much evidence as possible by speaking where possible with the person who raised the concern, to the individual involved and to any witnesses. The concern will be recorded in accordance with this policy, in the usual way.

All low-level concerns will be recorded in writing by the DSL. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained in accordance with the Foundation's Records Retention policy.

The relevant school will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the Foundation's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the school will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harms threshold, it will follow the above procedure and refer the matter to the designated officer.

Where a low-level concern relates to a person employed by a supply agency or a contractor, staff should share that concern with the DSL (or DDSL), and/or the Head. The concern will be recorded and the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

See **Section 3, Key Contacts for contact details for the Education Safeguarding Children's Manager, the Chair of Trustees & Deputy Chair of Trustees**

## **E) Allegation outcomes**

Only substantiated allegations/concerns should be included in references, provided that the information is factual and does not include opinions. Low level concerns should not be included in references unless they relate to issues which would normally be included in a

reference such as misconduct or poor performance or where the low-level concern meets the harms threshold for a referral to the LADO and found to be substantiated.

Allegations found to be malicious or false will be removed from the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's confidential personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. All other records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Records should be reviewed at the end of the retention period in case it is necessary to keep it for longer.

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

Where an allegation by a child is shown to have been deliberately invented or malicious, the Head will consider whether to take disciplinary action in accordance with the Behaviour Policy of the school; or whether the Police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil.

Where a report is determined to be unsubstantiated, unfounded malicious or false, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. If a report is shown to have been deliberately invented or malicious,

Where a parent has made a deliberately invented or malicious allegation the Head will consider whether it is appropriate to require that parent to withdraw their child or children from the Foundation on the basis that they have treated the Foundation or a member of staff unreasonably.

In accordance with *KCSIE*, our Schools will make every reasonable effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

In all cases where there are concerns or allegations of abuse, the Foundation will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

#### **F) Arrangements for dealing with safeguarding concerns and allegations about organisations or individuals using school premises**

The Foundation may receive an allegation or concern relating to an incident that happened when an individual or organisation was using our Schools premises for the purposes of running activities for children and/or vulnerable adults (for example community groups, sports associations, or service providers that run extra-curricular activities). As with any safeguarding allegation, our Schools will follow this safeguarding policy and procedures, including informing the LADO.

When services or activities at our Schools are provided under the direct supervision or management of school staff, this policy will apply in relation to any safeguarding concerns or allegations. Where services or activities are not under the direct supervision or management of our Schools, our Schools will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and the School will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the School on these matters where appropriate.

Our Schools have arrangements in place for the use of school premises for non-school activities including the availability of the DSL or DDSL and how they can be contacted.

## 28. Sexting

Sexting is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'.

As with all other actual or possible safeguarding issues and concerns, staff should not make their own judgements about whether a 'sexting' issue is more or less serious enough to warrant a report to the DSL. What may seem like less serious concerns to individual members of staff may be more significant when considered in the light of other information known to the DSL, which the member of staff may not be aware of.

If an incident of sexting comes to staff attention, this must be immediately referred to the DSL. Any device in the possession of a pupil (e.g. mobile phone, tablet, digital camera) which is related to an incident of sexting should be passed to the DSL who will decide if the device needs to be passed to the Police. Any decision to confiscate a device will be made in accordance with DfE advice *Searching, Screening and Confiscation – Advice for headteachers, school staff and governing bodies (January 2018)*.

Staff must be careful not:

- view, download or share the imagery, or ask the pupil to share or download – **this is illegal**. If staff have already viewed the imagery by accident (e.g. if a young person has showed it before staff could ask them not to), this must be reported to the DSL.
- delete the imagery or ask the young person to delete it.
- ask the young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- share information about the incident to other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- say or do anything to blame or shame any young people involved.

Staff should explain to the pupil that this needs to be reported and reassure them that they will receive support and help from the DSL.

The DSL may hold an initial review meeting with appropriate school staff and carry out interviews with the young people involved (if appropriate). Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm. Any decision not to inform the parents will be made in conjunction with other services such as local authority children's social care and/or the police, who will take the lead in deciding when the parents should be informed.

An immediate referral to police and/or local authority children's social care will be made 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 school know about the imagery 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 imagery is under 13;
- the school has reason to believe a pupil or pupil is at immediate risk of harm owing to the sharing of the imagery, for example, the young person is presenting as suicidal or self-harming.

The DSLs decision as to whether to report a 'sexting' incident will also give due regard to whether the incident was aggravated. Aggravated incidents involve criminal or abusive elements beyond the creation, sending or possession of sexual images created by young people. These include possible adult involvement or criminal or abusive behaviour by young people such as sexual abuse, extortion, threats, malicious conduct arising from personal conflicts, or creation or sending or showing of images without the knowledge or against the will of a young person who is pictured. Aggravated incidents of sexting will usually be referred to MASH for advice about whether or not a response by the Police and/or local authority children's social care is required. This will facilitate consideration of whether:

- there are any offences that warrant a Police investigation;
- parents/carers require support in order to safeguard their children;
- a multi-agency sexual exploitation (MASE) meeting is required;
- any of the perpetrators and/or victims require additional support. This may require
- the initiation of an early help services.

Examples of aggravated incidents include:

- any evidence of pressurising, intimidating, bullying, extortion and/or threatening of pupils by one or more other pupils to create and share indecent images of themselves;
- pressure applied to a number of pupils (e.g. all female pupils in a class or year group) to create and share indecent images of themselves;
- pressurising a younger pupil or pupils to create and share indecent images of themselves;
- pressurising a pupil with additional vulnerability to create and share indecent images of themselves;
- dissemination of indecent images of young people to a significant number of others (either as an act of so-called 'revenge porn' or exploitation);
- any evidence of adult involvement in acquiring, creating or disseminating indecent images of young people (possibly by an adult pretending to be a young person known to the victim).

The DSL will also consider the situation in which indecent images may have been shared i.e. with a small number in a known friendship group with no previous concerns constitutes an aggravated incident.

If the DSL decides to respond to the incident without involving the police or local authority children's social care this will be provided the DSL, following liaison with the Head and other staff as appropriate, is confident that they have enough information to assess the risks to pupils involved and the risks can be managed within the school's pastoral support and disciplinary framework and if appropriate local network of support. The DSL will consider arrangements to support the child, in conjunction with parents (where appropriate) and how to help the young people involved learn from the incident in order to keep themselves safe in future. In the latter instance, the DSL will usually consult with the Police and/or local authority

Children's Social Care through the MASH to check that no other relevant information is held by those agencies and to ensure an agreed response is documented before proceeding.

At any point in the process if there is a concern a young person has been harmed or is at risk of harm a referral will be made to local authority children's social care and/or the police immediately.

## **29. Confidentiality and Information Sharing**

All Foundation staff will understand that child protection issues warrant a high level of confidentiality. Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff will seek advice from the DSL or DDSL or outside agency as required (e.g. Education Safeguarding Manager). If any member of staff receives a request to see child protection records, they will refer the request to the Head or DSL and Foundation Bursar.

Whilst it is reasonable for staff to discuss day-to-day concerns about pupils with colleagues in order to ensure that children's general needs are met in school, staff should share all safeguarding concerns with the appropriate member of staff as identified in this policy. Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes. The person receiving the referral will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The Foundation recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the Schools and with local authority children's social care, the safeguarding partners and other organisations, agencies, and practitioners as required.

Safeguarding information will often be special category personal data and the Foundation will have due regard to its data protection obligations when sharing such data. The Foundation will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, it would be legitimate to share information without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

Warwickshire Safeguarding's guidance 'Information Sharing in Child Protection' is Appendix 9 of the Warwickshire Safeguarding inter-agency child protection procedures and can be

accessed at [www.warwickshire.gov.uk/wscbresources](http://www.warwickshire.gov.uk/wscbresources).

Every effort will be made to prevent unauthorised access to sensitive information. Any sensitive information that needs to be stored on portable devices such as laptop computers or tablets or on portable media such as a CD or flash drive will be password protected and encrypted and kept in locked storage. Further details can be found in the Foundation's ICT Acceptable Use Policy and Data Protection Policy.

### **30. Record Keeping**

The Foundation will maintain safeguarding records in accordance with *KCSIE* and guidance provided by WCC Education Safeguarding Service *Child Protection Record Keeping Guidance*.

In accordance with this guidance, the Foundation will:

- ensure all concerns, discussions and decisions (together with reasons) made under these procedures are recorded in writing. This will also help if/when responding to any complaints about the way a case has been handled by the school. Records will include a clear and comprehensive summary of the concern; details of how the concern was followed up and resolved; and a note of any action taken and the decision reached and outcome. This includes any decision to share or withhold safeguarding information together with the reasons for it and who the information has been given to;
- keep information confidential and stored securely;
- record all risk and needs assessments following a report of sexual violence and all risk assessments following a report of sexual harassment;
- ensure all discussions between the designated officer and case manager following an allegation of abuse against a member of staff (including supply staff, contractors and volunteers) and a Trustee is recorded in writing;
- ensure all written records note the date, event and action taken (even where there is no need to refer);
- keep records in a folder in a meticulous chronological order;
- review records relating to low-level concerns so that potential patterns of concerning, inappropriate, problematic or concerning behaviour can be identified and appropriate action taken;
- ensure all records are kept secure and in locked locations.

Child protection records will be maintained independently from the pupil's school file and the school file will be 'tagged' to indicate that separate information is held. Such records will only be accessible to the DSL and DDSLS and those members of senior management team on a "need to know" basis and shall be shared in accordance with the guidance set out in Parts One and Two of *KCSIE*.

All Foundation staff will record any safeguarding or child protection observations or concerns about a child using CPOMS. Staff without access to CPOMS should use *Logging A Concern About A Child's Safety And Welfare* (Form C) also known as the '*Green form*'. Copies of this form are found in the staff room, the DSL's office at Princethorpe, Crackley Hall and Crescent. Such records will include, in addition to the name, address and age of the child, timed and dated observations describing the child's behaviour, appearance, statements/remarks made to staff or other children and observations of interactions between the child, other children, members of staff and/or parents/carers that give rise to concern. Where possible and without interpretation, the exact words spoken by the child or parent/carer will be recorded. Records will be signed, dated and timed by the member of staff making the record. Records of safeguarding/child protection observations or concerns can be completed electronically or as a paper version but it is most important that all staff use one consistent system for the

recording of concerns and that all records are passed to the DSL, who should complete the form to confirm what action has been taken.

### **31. Arrangements for use of school premises for non-school activities**

When services or activities at our Schools are provided under the direct supervision or management of school staff, this policy will apply in relation to any safeguarding concerns or allegations.

Where services or activities are not under the direct supervision or management of our Schools, our Schools will seek assurance that any individual or organisation has appropriate safeguarding and child protection policies and procedures in place (and our Schools will inspect these as needed); and ensure that there are arrangements in place for the provider to liaise with the school on these matters where appropriate. This applies regardless of whether or not the children who attend any of these services or activities are children on the school roll.

Our Schools will ensure that the DSL or DDSL can be contacted and/or is available at all times when the school premises is in use, whether that activity is a school or non-school activity and regardless as to whether the children attending are on the school roll.

Our Schools will ensure that safeguarding requirements are included in any agreement for use of the school premises as a condition of use and occupation of the premises and that failure to do so by the provider to comply with this will lead to termination of the agreement.

When considering the safeguarding arrangements any providers have in place our Schools will have regard to the DfE's non statutory guidance '*Keeping children safe in out-of-school settings*' (April 2022).

### **32. Early Years Foundation Stage Arrangements**

This policy applies equally to children in EYFS either during the normal school day or attending after school club or holiday club.

#### **Disqualification from working in childcare**

Where staff work in, or are involved in the management of, any of our early years or provision of care of children under the age of eight, the school will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and from time to time during employment. This forms part of our safer recruitment practices, further details of which can be found in the Foundation's ***Safer Recruitment Policy***.

The Foundation will record all checks of staff employed to work in or manage relevant childcare on a Single Central Record. Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the school will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the school will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the designated officer when appropriate.

Staff who are disqualified may apply to Ofsted for a waiver of disqualification, unless they are barred from working with children.

## **Use of mobile phones and cameras**

The Foundation's policy on the use of mobile phones and cameras in the setting can be found in the Foundation's **Images of Pupils Policy** and as detailed here. Members of staff, children and parents should not use their private cameras or mobile devices to record images of children at any time within our EYFS setting (nursery and reception years) or whilst on school trips. Parents will wish to use their mobile phones or camera in or around the EYFS setting must first obtain the prior approval of the Head.

Staff who wish to use take photographs or video of pupils (whether on a personal or school device) must first speak with the Head to obtain their approval before taking any image of a pupil. Photographs will only be taken of children with their parents' consent using school equipment. Photographs will be downloaded onto school computers only and will be monitored and stored in accordance with the school's data protection policies and procedures.

Staff who wish to use their personal mobile devices or cameras in school for any other reason must first speak with the Head. Staff who act in breach of this may be subject to disciplinary action.

## **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings can be found on the *key contacts page 'Roles and Responsibilities' Part 3*.

## **33. Concerns and Complaints**

Parents are encouraged to raise any concerns directly with the relevant school, if necessary using this safeguarding policy for concerns about the safety and/or welfare of children. Our **Parents' Complaints Procedure** will otherwise be followed where a parent raises concerns. The Parents' Complaint procedure is available on request from our Schools. P

Complaints from staff are dealt with under the Foundation **Grievance Policy**.

Complaints which escalate into a safeguarding concern will be managed under this policy.

## **34. Monitoring, Evaluation and Review of Policy & Procedures**

We are aware that the Safeguarding Policy will adhere to on-going legal changes and obligations. Therefore, it is the responsibility of the Head, DSL and Senior Management Team to ensure that any deficiencies or weaknesses in safeguarding arrangements are remedied without delay. The Trustees will undertake an annual review of the Foundation's Safeguarding policies and procedures and of the efficiency with which the related duties have been discharged and the effectiveness of procedures and their implementation.

The Foundation draws on the expertise of staff, including the DSL(s), in shaping the School's safeguarding arrangements and policies.

If there has been a substantiated allegation against a member of staff, the School will work with the Local Authority designated officer to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future

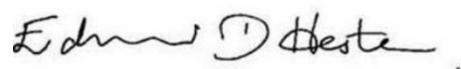
The DSLs for Princethorpe College, Crackley Hall and Crescent School will produce an annual report on Safeguarding for the Trustees and will meet with the Nominated Safeguarding Trustee who has oversight for their respective school, termly, to feedback, monitor and evaluate all child protection issues including training to staff.

**This Policy was adopted by the Governing Body on 18 September 2023.  
The policy will be reviewed in August 2024(or sooner if required)**

**Signed by the Chair of Trustees**



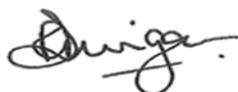
**Countersigned by the Foundation Principal**



**Countersigned by the Head of Princethorpe College**



**Countersigned by the Head of Crackley Hall**



**Countersigned by the Head of Crescent School**



### 35. Appendix I – Logging a child protection concern form

The following pages show a blank example of Warwickshire County Council's 'Form C' which staff at all Foundation schools will now use to log all child protection concerns.



#### Logging a concern about a child's safety and welfare

\*\*\* Guidance notes for completion \*\*\*

PART 1:

<b>Pupil's Name:</b>	<b>Date of Birth:</b>
<b>Date:</b>	<b>Time (of writing this record):</b>
<b>Name:</b> ..... ..... <b>Print</b> <span style="float: right;"><b>Signature</b></span> <b>Job Title:</b>	
<b>Note the reason(s) for recording the incident.</b> <i>Summary in a few words of the concern, e.g. concern about child's physical presentation including smells/something child said to an adult or another child/child's behaviour/child's comments in a lesson/interactions between child and parent</i> <i>e.g. indirect disclosure raising concern about possible physical abuse/sexual abuse/emotional abuse/neglect</i> <i>e.g. direct disclosure of physical abuse/sexual abuse/emotional abuse/neglect</i>	
<b>Record the following factually: Who? What (If recording a verbal disclosure by a child use their words)? Where? When (date &amp; time of incident)? Any witnesses?</b> <i>Which child is the concern about?</i> <i>Were any other children or staff present?</i> <i>What exactly was seen, heard, smelt or said that has raised concern?</i> <i>Record direct disclosures/statements/comments using child or adult's exact words within quotation marks</i> <i>Where and when was whatever is being recorded seen or heard?</i> <i>As far as it is possible to identify, if a child or adult is reporting an incident that occurred previously, who was involved and where and when did it take place?</i>	
<b>Professional opinion where relevant (how and why might this have happened?)</b> <i>Facts for which there is demonstrable evidence should be recorded as such, e.g. the child was crying, the child said ".....", the child has a bruise on the left cheek of her/his face.</i> <i>It is important and reasonable to record professional opinions, impressions and worries that fall short of facts but these must be recorded as such, e.g. "I formed the impression that the child was frightened because....."; "In my opinion", the child was not provided with adequate care before coming to school because ....."; "I was concerned that mother had been drinking alcohol and should not be driving the children home because I could smell alcohol and her speech was slurred".</i>	
<b>Note actions, including names of anyone to whom your information was passed.</b> <i>Clear statement of what the member of staff recording the concern did in response, e.g. reassure child, tell parent they would have to record and report what parents had told them, inform DSL.</i>	
<b>Any other relevant information (Factual)</b> <i>Any additional information the member of staff considers relevant and necessary for DSL to know in order to safeguard child and decide most appropriate response</i>	

**Check to make sure your report is clear now – and will also be clear to someone else reading it next year**

**PLEASE PASS THIS FORM TO YOUR DESIGNATED SAFEGUARDING LEAD**

**(Designated Safeguarding Lead to complete Part 2 overleaf)**

PART 2: (for use by Designated Safeguarding Lead)

*Working for Warwickshire*

<p>Time &amp; date information received by DP, and from whom</p>	<p><i>Time and date green form received by DSL from person recording the concern</i></p>
<p>Any advice sought by DP (date, time, name, role, organisation &amp; advice given)</p>	<p><i>Details of whoever DSL speaks to after receipt of green form, e.g. parents/carer; social worker in Children's Social Care; Education Safeguarding Manager; Police Officer</i></p>
<p>Action taken (referral to children's services/ monitoring advice given to appropriate staff/ CAF etc) If decision not to refer, justify reason.</p> <p>Note time, date, names, who information shared with and when etc.</p>	<p><i>Does information on its own or in combination with other information already known indicate that the child is suffering significant harm? NB refer to Working Together 2013 definitions of abuse; 'Worried about a child?' poster; 'Signs and Symptoms' handout; WSCB Thresholds for Intervention document.</i></p> <p><i>If yes, refer to Children's Social Care. Inform parents unless doing so is likely to increase risk of significant harm.</i></p> <p><i>If unsure, seek consultation with Children's Social Care or Education Safeguarding Manager.</i></p> <p><i>If no, discuss with parents; consider and discuss positively with parents/young person initiation of CAF process in order to ensure child's needs are properly assessed and understood and to co-ordinate early help. If CAF not required/appropriate, consider whether referral to single agency (e.g. school counsellor, School Nurse, Educational Psychologist) is appropriate; monitor; and record monitoring arrangements.</i></p>
<p>Parents informed</p> <p>Yes/ no</p> <p>and reasons</p>	
<p>Outcome</p> <p>Record names of individuals/agencies who have given you information regarding outcome of any referral (if made)</p>	
<p>Where can additional information regarding</p>	

child/ incident be found? (e.g. pupil file, serious incident book)	
Signed	
Printed Name	
Date	

## 36. Appendix II – Signs and Types of Abuse

### A) Types of Abuse

**Physical abuse:** is 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 (this used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness). The use of corporal punishment, and/or the encouragement of corporal punishment by parents is also a safeguarding concern.

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment which can occur between two children of any sex. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault and assault by penetration. Sexual harassment is 'unwanted conduct of a sexual nature' that can occur online and offline. 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. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and should refer to Section 25 of this policy on the Foundation's procedures for dealing with it.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. 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. 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 deliberating brushing against someone, interfering with someone's clothes, or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual harassment, which might include consensual or non-

consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. 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. Children who are victims of sexual violence and/or sexual harassment wherever it happens, 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.

**Harmful sexual behaviour (HSB):** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. HSB can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s Airdrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include ‘dick pics’ or ‘pics’ or may be referred to by adults or professionals as ‘youth produced/involved sexual imagery’, ‘indecent imagery’, ‘image based sexual abuse’ or ‘sexting’.

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

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online

- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** Upskirting is now a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without them knowing, 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. Anyone of any gender can be a victim.

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

- provide adequate food, 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.

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

- increased absence from school;
- a change in friendships;
- relationships with older individuals or groups;
- a significant decline in performance;
- signs of self-harm or a significant change in wellbeing;
- signs of assault or unexplained injuries; and/or
- unexplained gifts or new possessions (which may also be a sign of the child being at risk of CCE or CSE).

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 increases the likelihood for involvement in serious violence. Violence can often peak in the hours just before or after schools, when pupils are travelling to/from school.

Further information is provided in the following guidance from the Home Office: [Preventing youth violence and gang involvement](#) and [Criminal exploitation of children and vulnerable adults: county lines](#).

**Specific safeguarding issues:** 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 and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

- child missing from education;
- child missing from home or care;
- child sexual exploitation (CSE) ;
- behaviours linked to drug taking, alcohol abuse and truanting
- bullying including cyber-bullying;

- domestic abuse ;
- fabricated or induced illness;
- faith abuse;
- female genital mutilation (FGM);
- forced marriage;
- gangs and youth violence;
- gender-based violence/violence against women and girls (VAWG);
- mental health;
- private fostering;
- radicalisation, extremism and terrorism ;
- Sexting;
- child on child abuse
- teenage relationship abuse;
- trafficking
- SEND.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE):** Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into taking part in sexual or any criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

**Child Sexual Exploitation (CSE):** is a form of sexual abuse which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It may include physical contact (penetrative and non-penetrative acts) and non-contact sexual activity such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet. It can take place in person or via technology, or a combination of both; can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence; may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media) or awareness that they are being exploited (e.g. as they believe they are in a genuine romantic relationship); can be perpetrated by individuals or groups, males or females, and children or adults.

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. The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*".

Some of the following signs may be indicators of sexual exploitation:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who have older boyfriends or girlfriends;
- children who suffer from sexually transmitted infections or become pregnant;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse. CSE is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of drugs trafficking.

The Foundation teaches children about consent and the risks of CSE in the Princethorpe REAL time programme and RSE curriculum for Year 6 at Crackley Hall and Crescent School. A common feature of CSE is that the child often does not recognise the coercive nature of the relationship and does not see her/himself as a victim. The child may initially resent what she/he perceives as interference by staff but staff must act on their concerns, as they would for any other type of abuse.

All staff are made aware of the indicators of CSE and will manage any concerns in accordance with the safeguarding procedures set out in this policy. The DSL will consider the need to make a referral to MASH, Multi Agency Support Hub as with any other child protection concern and with particular reference to Warwickshire Safeguarding Children Board's Child Sexual Exploitation procedures. Parents will be consulted and notified as above (where appropriate). Following a referral to local authority Children's Social Care, a Multi-Agency Sexual Exploitation (MASE) meeting may be convened under WSCE inter-agency safeguarding procedures. The school will attend and share information at MASE meetings as required. Parents and young people will be invited to attend MASE meetings by local authority Children's Social Care as appropriate.

**Child Criminal Exploitation (CCE):** is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket, or to threaten other young people. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. 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,

their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim.

The victim may have been criminally exploited even if the activity appears consensual, an even if the activity appears to be something they have agreed or consented to. Children can become trapped by this type of exploitation, and may be at higher risk of CSE.

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however some of the following can be indicators of CCE:

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

It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

**County lines:** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying 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:

- who go missing and are subsequently found in areas away from their home;
- that 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 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.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation. A referral to the National Referral Mechanism should also be considered.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

**So-called 'honour-based' abuse:** (HBA) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include 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.

Staff will be alert to the possibility of a child being at risk of HBA or already having suffered HBA. It can include multiple perpetrators and may include non-violent forms of abuse.

All forms of so called HBA are abuse (regardless of the motivation) and staff will manage any concerns in accordance with the safeguarding procedures set out in this policy.

**FGM:** comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM.

To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil's return.
- A pupil is reluctant to undergo medical examination.

If staff have a concern that a pupil may be at risk of FGM or has suffered FGM, they should activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with Police and local authority Children's Social Care. If in any doubt, staff should speak to the DSL.

There is a statutory duty on teachers to personally 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. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve local authority children's social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (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 it involves a pupil over 18, teachers should follow the school's local safeguarding procedures.

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:** 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 communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. 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 18<sup>th</sup> 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. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fm@fco.gov.uk](mailto:fm@fco.gov.uk).

**Radicalisation:** Protecting children from the risk of radicalisation is part of a school's safeguarding duties and is similar in nature to protecting children from other forms of harm and abuse. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Even very young children have been exposed, in rare circumstances, to radicalisation, extremism or terrorism at home and elsewhere including online. As children get older, they look for adventure and excitement and they may start to ask questions about their identity and belonging. During that stage of their development they are vulnerable to extremist groups that may claim to offer answers, identity and a social network apparently providing a sense of belonging. Many of those extremist groups make sophisticated use of the internet and social media to target young people and spread their ideology, making young people more vulnerable to being influenced by extremist ideas.

Our Schools also have responsibilities to ensure that children are safe from terrorist and extremist material when accessing the internet in school. During the process of radicalisation it is possible to intervene to prevent vulnerable people being radicalised. Our Schools are committed to preventing pupils from being radicalised and drawn into any form of extremism or terrorism. We promote the values of democracy, the rule of law, individual liberty, mutual respect and tolerance of those with different faiths and beliefs by providing pupils with opportunities through the curriculum to discuss issues of religion, ethnicity and culture and learn how to discuss and debate points of view; and by ensuring that all pupils are valued and listened to within school.

School staff receive training that provides them with both the information they need to understand the risks affecting children and young people in this area; and how to support them. There is no single way of identifying 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 susceptibility. Similarly, radicalisation can occur through different methods such as online. 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 susceptible

and act proportionately, which may include making a Prevent referral. Staff are trained to report all concerns about possible radicalisation and extremism to the DSL immediately as they would any other safeguarding concern.

We recognise the importance of providing a safe space for children to discuss controversial issues; and building their resilience and the critical thinking skills they need in order to challenge extremist perspectives. The DSL will act proportionately and will make appropriate referrals to the Police Prevent team and Channel programme in respect of any pupil whose behaviour or comments suggest that they are vulnerable to being radicalised and drawn into extremism and terrorism in order to ensure that children receive appropriate support. The school will discuss any concerns about possible radicalisation identified in school with a child's parents/carers as with any other safeguarding unless there is reason to believe that doing so would place the child at risk; and will also support parents/carers who raise concerns about their children being vulnerable to radicalisation.

In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. 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 at the new school.

The school expects all staff, volunteers, governors, visiting professionals, contractors and individuals or agencies that hire school premises to behave in accordance with this policy and the Staff Code of Conduct, and will challenge the expression and/or promotion of extremist views and ideas by any adult on school premises or at school events and, when necessary, will make appropriate referrals in respect of any such adult.

Parents and staff may find the website [www.educateagainsthate.com](http://www.educateagainsthate.com) informative and useful. The website is designed to equip school and college leaders, teachers and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people and how best to support them. The website provides information on training resources for teachers, staff and school and college leaders.

**Special Educational Needs and/or Disabilities:** Pupils with SEND or certain medical or physical health conditions may not outwardly shown signs of abuse and/or may have difficulties in communication about abuse or neglect. Pupils with SEND or health conditions are three times more likely to be abused by their peers. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in overcoming these barriers; and
- being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in School or the consequences of doing so.

To address these additional challenges, the Schools have put in place additional pastoral support measures which can be located in the SEND policy.

Staff will support such pupils in expressing any concerns they may have and will be particularly vigilant to any signs or indicators of abuse, discussing this with the DSL and the Head of

Learning Support/SENCO as appropriate. Any reports of abuse involving children with SEND will entail close liaison with the DSL or DDSL and named person with oversight for SEN.

**Lesbian, Gay, Bi or Trans (LGBT):** Children who are LGBT can be targeted by their peers. In some cases, a pupil who is perceived by their peers 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. The Schools endeavour to provide a safe space for LGBT children to speak out or share their concerns with trusted members of staff.

At Princethorpe Pupils can speak to their Head of house, tutor or a member of the medical centre team. At Crackley Hall and Crescent pupils can speak to their form teacher.

**Children and the court system:** Children are sometime required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed, and this will be stressful for them. Making child arrangements following separation can also be stressful and entrench conflict in families. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this policy.

**Children with family members in prison:** Children who have a parent in prison are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. Staff should be alert to the needs of such pupils and report any concerns to the DSL or DDSL in accordance with this policy. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

**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 skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a DDSL), 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. 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](http://NCSC.gov.uk)

**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).

**Domestic Abuse:** Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional and coercive and controlling behaviour. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (also known as teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socio- economic status, sexuality or background and domestic abuse can take place inside or outside of the home. T

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.

All concerns about children being affected by domestic abuse will be reported to the DSL as with any other safeguarding concern in accordance with the procedures set out in this policy. The DSL will respond to the report by consulting Children's Social Care in order to establish whether a referral is required or the situation should be managed by discussion with parents/carers and possibly the offer of early help. The Foundation works in partnership with Warwickshire Police and Warwickshire Children's Services to support pupils who are affected by incidents of domestic violence and abuse. This scheme is called Operation Encompass.

When the Police attend any incident of domestic violence or abuse in any household in which a pupil lives, the relevant Head and the DSL will receive a confidential and secure email notifying them simply that there has been an incident and that the child may need support. On receipt of any such notification, the Head and/or DSL will ensure that teachers and other staff directly in contact with affected children support them with due kindness, care and sensitivity; information will be shared on a need to know basis. In addition to supporting children, the process means that the Foundation will also be in a position to offer parents and carers support as appropriate. The information will be managed and stored with the utmost sensitivity and discretion consistent with all other confidential safeguarding records.

**Homelessness:** 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. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. The DSL or DDSL will raise/progress any concerns about homelessness with the Local Housing Authority although this does not replace a referral into local authority children's social care where a child has been harmed or is at risk of harm.

**Children who are absent from school:** A child being absent from School, particularly repeatedly and/or for prolonged periods, and children missing education is a potential indicator of a range of safeguarding issues such as abuse, neglect, sexual abuse, CSE and CCE. It 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 FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who are absent which can be found in the Missing Child and Absence Policy. Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The Foundation's policy supports identification of abuse and provides preventative measures against the risk of the child being absent and/or becoming a child missing education in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

**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).

**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 available on the gov.uk website. The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The Schools may refer some parents and carers to this service where appropriate

**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.

**Looked after children:** Looked after children (and previously looked after children) are a particularly vulnerable group. The Schools will ensure that prompt action is taken when necessary to safeguard these children and that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after (and previously looked after) by a local authority. *The designated member of teaching staff who has responsibility for their welfare and progress and to ensure that the needs are met is the DSL who is the nominated person in charge of Looking After Children and can be found in the Key Contacts Section 3.* The Schools ensure that the designated member of staff receives appropriate training in order to carry out their role and has the information they need in relation

to any child's looked after status, their care arrangements (including contact arrangements with birth parents and those with parental responsibility) and details of the child's social worker and virtual school head.

The designated member of staff will also have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care and will work closely with virtual school heads to promote their educational achievement. The DSL will ensure they have details of the local authority Personal Advisor appointed to guide and support any care leavers and will liaise with them as necessary regarding any issues of concern affecting them.

**Children staying with host families:** The Schools may make arrangements for pupils to stay with a host family during a foreign exchange trip or sports tour. In such circumstances the Schools follow the guidance in KCSIE, Annex C to ensure that hosting arrangements are as safe as possible. Full details can be found in the Foundation's Safer Recruitment Policy on the respective school website.

**Mental health:** All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or 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, attendance and progress at school. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL or a DDSL.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol. Further guidance can be found at paragraphs 183 – 185 of KCSIE.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

## **B) Indicators of abuse**

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural

indicators of abuse and report any concerns to the DSL.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour – from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol; and/or
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development;
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are – they do not need 'absolute proof' that the child is at risk.**

**Child on child abuse:** See **Section 25** of this policy on the Foundation's procedures for responding to concerns about child-on-child abuse.

Child-on-child abuse is abuse by one or more children against another child and that it can happen both inside and outside of school or college and online. It can be standalone or as part of wider abuse. It can manifest itself in many ways and can include (but not limited to): bullying (including cyber bullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships between peers ('teenage relationship abuse'); physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm); sexual violence (such as rape, assault by penetration and sexual assault, and this includes 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 standalone 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 nude and semi-nude images and/or videos; upskirting; and 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).

It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. The Foundation also recognises the gendered nature of child-on-child abuse (i.e. that it is more likely that girls will be “victims” and boys “perpetrators”).

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

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

Sexual violence and sexual harassment, as a type of child-on-child abuse, may overlap and can occur online and offline (both physical and verbal). Examples of sexual harassment include sexual comments sexual “jokes” or taunting; physical behaviour such as deliberately brushing against someone; non-consensual sharing of sexual images (especially around group chats); sharing of abusive images and pornography to those who do not wish to receive such content; abusive, harassing and misogynistic messages and sexualised online bullying.

## **37. Appendix 3: Remote Education**

### **A. Context**

This has been drawn up in light of supplementary safeguarding and remote education guidance issued by the DfE and *KCSIE*. The Foundation will continue to provide remote education to allow pupils, who are well enough to learn, to keep pace with their education when in-person attendance in school is either not possible or contrary to government guidance.

### **B. The Designated Safeguarding Lead (and Deputies)**

The DSL and DDSLs for each school are named in the main safeguarding policy. The Foundation will provide the DSL and DDSLs with additional time to enable them to respond and provide support to those children working remotely where there are safeguarding and welfare concerns.

### **C. School Attendance**

The Foundation's normal attendance and absence monitoring procedures apply. Where a pupil is unable to attend school, the Foundation will have due regard to guidance issued by the DfE in relation to school attendance and recording of such absences.

The Schools will maintain a register/database of those children who are out of school and will keep a record of, and monitor engagement with remote learning.

### **D. Remote Arrangements**

Where the pupil is receiving education remotely, the DSL or Pastoral Deputy Head will be notified and will identify the nature and frequency of contact the child to help promote of their safety and wellbeing. This might include phone calls, text contact, Skype or home visits. The child's engagement in remote lessons will also be monitored. The DSL will also consider if a targeted plan of support is required, which will be recorded on the child's safeguarding file and regularly reviewed.

All Foundation policies including the ***Safeguarding Policy, Staff Code of Conduct*** and ***ICT Acceptable Use Policy*** must be followed at all times both in face to face and electronic communication with pupils and parents/carers.

Staff should also have regard to government guidance on remote teaching (including Annex B of *KCSIE*, which includes a dedicated collection of resources to support safe remote education, virtual lessons and live streaming). In addition, where education is being provided remotely:

- The school will request and obtain written consent from parents/carers before staff communicate with children online.
- All communications with parents and pupils should take place in school hours as much as possible and via school email accounts and devices.
- Staff must not share personal information and must use Foundation/service owned technology and accounts (e.g. not personal email accounts) for the delivery of remote lessons/tutorials. Where possible, applications that facilitate the recording of lessons will be used. School leaders may randomly sample recorded lessons in order to safeguard pupils/students and staff and to ensure that policies are being followed.

- If staff need to deliver lessons/tutorials on a one-to-one basis or communicate with children who are not attending school via video chat, they will speak to parents/carers before lessons commence and at the end of lessons before logging off.
- The school will consider whether one-to-one sessions could be appropriate, for example, to provide pastoral care or provide additional support for those who are vulnerable or have SEND (which will be discussed and approved by the senior leadership team to assess any risks).
- Pupils will be encouraged to speak up if they come across something worrying online. Pupils will be reminded to ensure their logins and passwords are secure
- It is important that all pupils, parents and staff understand the reporting routes to raise any safeguarding concerns in relation to remote online education.
  - Princethorpe:
    - For pupils this is their tutor or Head of House; .
    - For parents this is their child's tutor or Head of House;.
  - Crackley Hall
    - For pupils this is their form tutor, Phase Leader or Pastoral Deputy;
    - For parents this is their child's form tutor, Phase Leader or Pastoral Deputy;
  - Crescent
    - For pupils this is their form tutor, Phase Leader or Pastoral Deputy;
    - For parents this is their child's form tutor, Phase Leader or Pastoral Deputy;
- It is important that all staff who interact with children, including online, continue to look out for signs that a child may be at risk, distressed for some reason or vulnerable in some other way; and report and record that following normal safeguarding procedures. All such concerns must be brought to the attention of a DSL and dealt with by a DSL as per the main policy in the normal way.
- The school will ensure that online learning tools and systems are used in line with privacy and data protection/GDPR requirements.

Any safeguarding concerns, suspicions or disclosures regarding a child at home must be acted on immediately in accordance with the Foundation's safeguarding procedures.

The Foundation will continue to have regard to its data protection obligations when processing personal data, including ensuring pupils, staff and parents are provided with sufficient information about any personal data captured during lesson recordings.

It is very unlikely that home visits will take place unless exceptional circumstances apply (such as where it is not possible for arrangements to be put in place to enable the school to make contact with the child and their family remotely) and following an appropriate risk assessment.

## **E. Safeguarding arrangements**

The Foundation recognises that school is a protective factor for children and young people and that the extraordinary circumstances created by the COVID-19 virus may continue to affect the mental health of some pupils/students and/or their parents/carers: some pupils may experience a variety of emotions such as anxiety, stress or low mood. All staff will be vigilant to this and when a response may be required, in accordance with the Foundation's **Safeguarding Policy**. All staff will maintain an awareness of those matters in communications with children and their parents/carers including when setting expectations of pupils' work when they are at home. **All staff must follow the procedures in the Safeguarding Policy if they have any concerns about a pupil's welfare, irrespective of whether they are in school or learning remotely.**

## F. Online safety

The Foundation is committed to providing children with a safe environment in which to learn (including online) and supporting parents with online safety (including emphasising the importance of pupils keeping log in credentials and passwords safe). This includes encouraging parents to provide age-appropriate supervision for their child(ren)'s use of the internet; talking to their children about not accessing age-inappropriate material on devices; knowing who their children are talking to online; setting up age-appropriate parental controls on devices; ensuring internet filters block malicious websites. As part of this, the school will ensure that parents are aware of what their children are being asked to do e.g. what sites they are being asked to use and which staff their child will interact with.

Parents should note that the Foundation is unable to filter activity on devices not owned by the Schools. Parents may find it useful to refer to <https://www.internetmatters.org/blog/parental-controls/broadband-mobile/> for guidance on putting some restrictions in place to keep children safe.

Parents may also find it helpful to read guidance on keeping their children safe online, which includes:

- [support for parents and carers to keep children safe from online harm](#)
- [support to stay safe online](#)
- [Thinkuknow](#) provides advice from the National Crime Agency (NCA) on staying safe online
- [Childnet](#) which offers a toolkit to support parents to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- [Internet matters](#) provides guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- [Let's Talk About It](#) has advice for parents to keep children safe from online radicalisation
- [UK Safer Internet Centre](#) has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services
- [NSPCC](#) has advice on setting up parental controls, tips on how to talk to children about online safety, including the risk of sharing and receiving nude images and how to support children if they have seen something online that has upset them

Where pupils/students are using ICT equipment in school, appropriate supervision will be in place as normal.

Below are other issues that staff need to take into account when delivering virtual lessons, especially where webcams are involved:

- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be blurred.
- Ensure appropriate privacy settings are in place.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including that used by any family members in the background.
- Staff must only use platforms specified by senior managers and approved by the Foundation's ICT manager/co-ordinator for communication with pupils/students
- Staff should record the length, time, date and attendance of any sessions held.

## **G. Records**

A record of all communications with the child, parents/carers and practitioners in partner agencies will be kept on the child's safeguarding file (\*including telephone calls, emails, other online communication, video conversations and virtual meetings), as appropriate.