

New Islington Free School

Safeguarding and Child Protection Policy

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Contact details for safeguarding and child protection

Keeping Children Safe in Education 2019 references the introduction of Safeguarding Partnerships which will replace all Local Safeguarding Children Boards (LSCBs) with a team of key professionals from the Local Authority, Clinical Commissioning Group and the police.

Each locality will have access to its own dedicated team, who will work collaboratively to implement new safeguarding strategies with the aim of strengthening the child protection and safeguarding system in the local area.

Schools will still contact the LSCB until this change comes into effect.

https://greatermanchesterscb.proceduresonline.com/chapters/pr_contacts.html

Local Authority Designated Officers (LADOs)	Majella O'Hagan Jackie Shaw Telephone: 0161 2341214 Email: quality.assurance@manchester.gcsx.gov.uk
Local Authority Children's Social Services (Manchester)	Telephone: 0161 2345001 Email: mscreply@manchester.gov.uk socialcare@manchester.gcsx.gov.uk for sensitive information Out-of-hours emergency duty team: Telephone: 0161 2558266
Manchester Safeguarding Children Board 0161 234 3330 (mccb@manchester.gov.uk)	www.manchesterscb.org.uk
Multi-Agency Safeguarding Hub	Telephone: 0161 205 5061 Email: mscreply@manchester.gov.uk Consultation Line 0161 2192895
Support and Advice about Extremism	Police Channel Team GMP CTU Telephone: 0161 856 6362 Emergency number: 999 Non-emergency number: 101 Email: channel.project@gmp.police.uk Local Authority Prevent Team Telephone: 0161 234 1489

	<p>Email: s.butt@manchester.gov.uk</p> <p>Prevent Lead: Samiya Butt</p> <p>Department for Education Non-emergency number: 020 7340 7264 Email: counter.extremism@education.gsi.gov.uk</p>
NSPCC whistleblowing advice line	<p>Address: Weston House, 42 Curtain Road London EC2A 3NH Telephone: 0800 028 0285 Email: help@nspcc.org.uk</p>
Disclosure and Barring Service	<p>Address: PO Box 181, Darlington, DL1 9FA Telephone: 01325 953795 Email: dbsdispatch@dbs.gsi.gov.uk</p>

National College for Teaching and Leadership	<p>Address: 53-55 Butts Road, Earlsdon Park, Coventry, CV1 3BH Telephone: 0207 593 5393 Email: misconduct.teacher@education.gov.uk</p>
OFSTED Safeguarding Children	<p>Telephone: 0300 123 4666 (Monday to Friday, from 8am to 6pm) Email: Whistleblowing@ofsted.gov.uk</p>

Important additional contact information

Local authority Children's Social Care:

Manchester	0161 234 5001
Bolton	01204 337 400
Bury	0161 253 5454
Oldham	0161 770 3790
Rochdale	0845 226 5570
Salford	0161 603 4500
Stockport	0161 217 6028
Tameside	0161 342 4150
Trafford	0161 912 5125
Wigan	01942 828 300

Police
(emergency)

101 (non-emergency), 999

Manchester Family Information Service

0800 083 7921

Childline

0800 1111

NSPCC 24/7 Helpline	0808 800 5000
Barnardo's	0800 942 8787
NSPCC FGM Helpline	0800 028 3550
National Bullying Helpline	0845 22 55 787

Contact details for safeguarding and child protection at New Islington

For the purpose of this policy, the following individuals are the relevant post holders.

Chair of Governors: Mr Maurice Watkins who may be contacted via the School Business Manager (see below)

Lead Governor with responsibility for safeguarding and child protection: Steve Foster who may be contacted via the School Business Manager (see below)

Head Teacher: Mrs Tabitha Smith who can be contacted on 0161 273 8007 or t.smith@newislingtonfreeschool.co.uk

School Business Manager/Clerk to the Governors: Mrs Paula Millward who may be contacted on 0161 273 8007 or p.millward@newislingtonfreeschool.co.uk

Designated Safeguarding Lead: Mrs Tabitha Smith who can be contacted on 0161 273 8007 or t.smith@newislingtonfreeschool.co.uk

Deputy Designated Safeguarding Lead: Mrs Paula Millward who may be contacted on 0161 273 8007 or p.millward@newislingtonfreeschool.co.uk

Statement of intent

The safety and well-being of our pupils is our highest priority. Our aim as a school is to know every pupil as an individual and to provide a secure and caring environment so that they can learn in safety. Everyone should be aware that safeguarding incidents can happen at any time and in any location and are duly required to be alert to any possible concerns. By adopting the approach 'it could happen here' we believe our increased vigilance will help to keep our pupils safe.

The School recognises that safeguarding and promoting the welfare of children is the responsibility of **all individuals working in or for the School including all teaching and non-teaching staff, residential and part-time staff, supply staff, governors, volunteers and contractors. All references to 'staff' in this policy should be interpreted as applying to the aforementioned unless otherwise stated.** Everyone who comes into contact with children has a role to play in identifying safeguarding concerns, sharing information and taking prompt action when necessary.

In all matters relating to safeguarding, the School will follow the procedures laid down by Manchester Safeguarding Children Board (MSCB or Local Safeguarding Partnership), together with relevant DfE guidance, such as Working Together to Safeguard Children July 2018 (hereafter, WTSC), Prevent Duty Guidance for England and Wales 2015 (hereafter Prevent Duty Guidance), and Keeping Children Safe in Education September 2019 (hereafter, KCSIE).

It should be noted that Local Safeguarding Children Boards are being replaced by 'safeguarding partners'. Under the new legislation, three safeguarding partners (local authorities, chief officers of police, and clinical commissioning groups) must make arrangements to work together with relevant agencies (as they consider appropriate) to safeguard and protect the welfare of children in the area. NIFS is committed to being fully engaged with the new safeguarding arrangements.

The School recognises that its duty is to safeguard and promote the welfare of all its pupils in a manner which respects the dignity, privacy and beliefs of all and without discrimination on the basis of gender, race, ethnicity, religion, sexual orientation or disability. This includes children who are in need (Section 17, Children Act [1989]) and children who are at risk of harm (Section 47, Children Act [1989]).

This policy is applicable to the whole school community and is published on the School website. All staff (as defined) have a duty to safeguard our pupils. They must therefore familiarise themselves and comply with this policy at all times, along with the School's code of conduct for staff (available to staff on the staff shared drive of the school network). They must also read and retain a copy of Part 1 and Annex A of KCSIE (September 2019)

The School will put in place training mechanisms to assist staff to understand and discharge their role and responsibilities, as set out in Part 1 and Annex A of KCSIE. This will include regular (at least annually) update briefings, discussion and assessment of the training needs of staff.

The School recognises that many members of staff at NIFS have developed considerable expertise by managing concerns on a daily basis and undertaking safeguarding training. The School capitalises on this expertise by providing opportunities for these staff to contribute to and shape safeguarding arrangements and policy.

Parents/carers and pupils also have an important role in supporting the School in safeguarding children. Copies of this policy, together with our other policies relating to safeguarding and child protection, are posted on our website. Parents/carers and pupils should feel able to provide input into this policy and to raise with the School any issues or concerns that they may have.

Allegations of child abuse or concerns about the safety and welfare of any child will be dealt with consistently in accordance with this policy.

Related policies

This policy should be read together with the School's policies for Anti-bullying and Safer Recruitment, which can be accessed on the School's website. Staff must also read the Staff Code of Conduct, along with the Whistleblowing policy.

Safeguarding and child abuse

Safeguarding children consists of the following:

- protecting children from maltreatment, including abuse and neglect
- preventing impairments to their health and development
- ensuring that they are safely and effectively cared for, and
- taking action to ensure that they have the best outcomes.

Child abuse

Child 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 protect a child from harm. A child might be abused by an adult or adults, or another child or children. Children may be abused in a family or in an institutional community setting by those known to them, or more rarely, by others, for example, via the internet. Some of the main forms of child abuse are set out below but staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label.

Physical abuse: a form of abuse which might involve hitting, shaking, throwing or otherwise causing physical harm. Physical harm may also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Emotional abuse might take the form of bullying, exploitation or corruption of the child. It may involve conveying to a child that he or she is worthless or unloved, or denying the child opportunities to express him or herself, deliberately silencing them or 'making fun' of what they say or how they communicate. Emotional abuse might also manifest itself in inappropriate expectations being imposed on a child. Equally, it might involve the child seeing or hearing the ill-treatment of another, for example through acts of domestic violence.

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 or non-penetrative acts. They might also include non-contact activities, such as involving children in looking at, or in the production of, sexual images. They might also involve 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.

Neglect: might be defined as the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Examples of neglect include 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; or ensure access to appropriate medical care or treatment. It might also include neglect of, or unresponsiveness to, a child's basic emotional needs.

However, child abuse can take other forms, including so-called, 'honour-based' violence, female genital mutilation (FGM), child sexual exploitation (CSE) peer on peer abuse and radicalisation and violent extremism. Further details of the School's approach to these and other specific safeguarding issues are set out in greater detail in **Appendix 1**.

Signs of possible child abuse

The following signs may or may not be indicators that abuse has taken place. The lists are not exhaustive and the categories are not mutually exclusive. There will often be overlap. Consequently, any person with responsibilities under this policy **must** share their concerns with the Designated Safeguarding Lead.

Signs of possible physical abuse: any injuries not consistent with the explanation given for them; injuries which occur to the body in places which are not normally exposed to falls or rough games; injuries which have not received medical attention; reluctance on the part of a child to change for, or participate in, games or swimming; bruises, bites, burns and fractures which do not have an accidental explanation; object shaped bruises; inconsistent accounts given by the child for the cause of injuries.

Signs of possible emotional abuse: depression, aggression, extreme anxiety, changes or regression in mood or behavior; obsessions or phobias; sudden underachievement or lack of concentration; seeking adult attention and not mixing well with other children; negative statements made by the child about him or herself; acts of aggression or cruelty to others; extreme shyness or passivity; stealing and lying

Signs of possible sexual abuse: any allegations made by a child concerning sexual abuse; excessive preoccupation by the child with sexual matters and age-inappropriate knowledge of adult sexual behaviour; regular engagement in age-inappropriate sexual play; sexual activity through words, play or drawing; repeated urinary infections or unexplained stomach pains; eating disorders.

Signs of possible neglect: dirty skin, body smells, unwashed, uncombed hair and untreated lice; clothing that is dirty, too big or small, or inappropriate for weather conditions; frequent

occurrences where the child is left alone or unsupervised; frequent diarrhea, tiredness and/or hunger; untreated illnesses, infected cuts or physical complaints; overeating.

Signs of possible child sexual exploitation: sexual exploitation can be very difficult to identify. Warning signs can easily be mistaken for 'normal' teenage behaviour. Young people who are being sexually exploited may be involved in abusive relationships, intimidated and fearful of certain people or situations; hang out with groups of older people, or anti-social groups, or with other vulnerable peers; associate with other young people involved in sexual exploitation; get involved in gangs, gang fights, gang membership; have older boyfriends or girlfriends; spend time at places of concern, such as hotels or known brothels; not know where they are, because they have been moved around the country; go missing from home, care or education. They may also show additional signs of sexual abuse or grooming, such as:

- appearing with unexplained gifts or new possessions
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- suffering from sexually transmitted infections or become pregnant
- suffering from changes in emotional well-being
- misusing drugs and alcohol
- going missing for periods of time or regularly come home late
- regularly missing school or education or do not take part in education.

Signs of possible extremism/radicalisation: different people display various signs of radicalisation. Some people are able to hide it so well that they are indistinguishable from anybody else, making it hard to identify them as radicalised and understand what their intentions are or could be. The following are some signs that could mean somebody could be at risk of radicalisation or is going through a radicalisation process:

Physical changes: sudden or gradual change in physical appearance; sudden or unexpectedly wearing religious attire; getting tattoos displaying religious or political messages; unexpectedly growing a beard; unexpectedly shaving their head (skinhead);

Possesses unexplained gifts and clothing (groomers will sometimes use gifts such as mobile phones and clothing to bribe a young person).

Social changes: cuts ties with their friends, family or community; starts to become socially withdrawn; becoming dependent on social media and the internet; begins to associate with others who hold radical views; bullies or demonises other people freely; begins to attend rallies and demonstrations for extremist causes; associates with known radicals; visits extremist websites, networks and blogs.

Emotional and verbal changes: begins to complain, often with anger, about governmental policies, especially foreign policy; advocates violence or criminal behaviour; begins to believe in government conspiracies; exhibits erratic behaviour such as paranoia and delusion; speaks about seeking revenge; starts to exhibit extreme religious intolerance; demonstrates sympathy to radical groups; displays hatred or intolerance of other people or communities because they are different.

What to do if you have concerns over a child's safety and welfare

The School treats the safeguarding of children as its highest priority and recognises the additional role it has to play in the referral of children who are suffering or are likely to suffer significant harm.

All staff must have regard to the Greater Manchester Safeguarding Children Procedures (hereafter, GMSCP), which are adopted by the MSCB. These can be downloaded from the MSCB website. <https://www.manchestersafeguardingboards.co.uk/>

It is important at all times to keep an open mind about a child's safety and welfare and never assume that safeguarding issues are confined to certain individuals, families or settings. It is particularly important to avoid making assumptions about a child based on personal perceptions of his or her domestic circumstances and family members. Being familiar with the types and signs of abuse set out above is a key part of this.

How to deal with a disclosure by a child

If staff suspect or hear a disclosure, allegation or complaint of abuse or neglect from a child or any third party, they must follow the relevant procedure below. All staff should:

- listen carefully
- avoid asking leading questions
- reassure the child that the disclosure, allegation/complaint will be taken seriously
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child), and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken.

Any person who receives a disclosure from a child which raises concerns over the safety and welfare of a child must listen and record their statement, in writing, as accurately as possible. Any questioning must be limited to the minimum necessary for purposes of clarification.

Under no circumstances should the person receiving the disclosure attempt to investigate his or her concerns. Staff are aware that other agencies are responsible for undertaking child protection investigations. Consequently, they understand that inappropriate investigation by others, no matter how well-meaning, could undermine the work of these other agencies.

Absolute guarantees of confidentiality must not be given to the child. Instead, the child should be told that the matter will be referred to an appropriate person in a position of responsibility who will be able to help. However, the School will ensure that the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The School manages this by creating opportunities for the child to talk to appropriate members of the pastoral team or the school nurse. The School operates its processes with the best interests of the pupil at their heart.

The duty to report concerns to the Designated Safeguarding Lead

Every member of staff is required to report as soon as possible to the DSL their concerns over a child's safety and welfare, regardless of whether or not they have received a disclosure. Where a child is suffering or is likely to suffer significant harm, the DSL must be informed immediately.

Where the DSL cannot be contacted immediately, this discussion can take place with the Deputy Designated Safeguarding Lead.

It is vital that, following the submission of a report to the DSL, the person concerned continues to monitor the child's safety and welfare.

Where concerns remain, the person should remain in contact with the DSL to ascertain what action is being taken. If a child's situation does not appear to be improving, the DSL (or the person who made the referral) should press Children's Social Care for reconsideration. Staff should challenge any inaction and follow this up with the DSL and Children's Social Care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. Staff should understand that they can refer a child directly to Children's Social Care, especially where they are concerned that a child is suffering or likely to suffer significant harm. Indeed, there is a duty on all staff to persist with referrals to Children's Social Care if they feel appropriate action is not being taken.

Guidance as to how to respond to allegations of child abuse against a member of staff is set out in more detail elsewhere in this policy. However, any member of our community who raises a concern over the safety and welfare of a child can be confident that he or she will be always fully supported by the School.

If a child is in danger or is at imminent risk of significant harm, a referral must be made to Children's Social Care and/or the police immediately.

Record keeping

Anyone who has concerns over a child's safety or welfare, including suspicions of child abuse, must maintain a prompt, clear and accurate record. Concerns should be noted using an 'NIFS Safeguarding Note of Concern' as soon as is reasonably practical after they have arisen, including details of particular incidents and conversations. This record should also include:

- the date and time of any observation or disclosure
- a detailed factual account of any incident, including verbatim comments
- details of the child's appearance, behaviour, emotional state and actions

A written record must be made of all concerns, decisions based on those concerns and the reasons for those decisions. Records of concern should be passed as soon as possible to the DSL, and will be kept confidentially by the DSL (Head Teacher) and reviewed regularly so that any recurring patterns of concern can be spotted and appropriate action taken. All child protection records are kept securely in the DSL's office and are separated from routine pupil records. Access is restricted to the DSL (Head Teacher), Deputy DSL, and Lead Governor. Where pupils move to new schools their child protection files will be transferred securely and a confirmation of receipt requested. The handling and destruction of such files will be in accordance with the Information Commissioner's guidance.

Referring cases to Children's Social Care

The decision to refer concerns over a child's safety and welfare to Children's Social Care will normally be taken by the DSL. However, anyone can make such a referral directly. If it is necessary to consult outside the School, they should speak in the first instance to staff at the

First Response Team (using the Children's Social Care contact numbers at the beginning of this policy).

The School's policy and procedures for dealing with concerns about a child

The School will not impose high thresholds on referrals to Children's Social Care or other relevant external agencies such as the police.

Consequently, when responding to concerns over a child's safety and welfare, the School will follow both the GMSCP guidance and the more detailed guidance on thresholds found in the MSCB's Multi- Agency Levels of Need (Threshold) Document.

The School will always make a referral where:

- a child is in immediate danger or suffering or likely to suffer significant harm
- with the agreement of the child and/or a person with parental responsibility (depending on the age of the child), a child is likely to benefit from family support services.

A referral will be made immediately if a child is in immediate danger or is suffering or likely to suffer significant harm. Referrals will be made even where it is known that Children's Social Care is already involved with the child and/or his or her family.

A verbal referral will be supported in writing, usually by the completion of a Safeguarding Children Referral Form or equivalent document within 24 hours of the referral being made. Supporting documentation should be sent securely to the relevant Contact Centre or equivalent, either through a secure e-mail or as a password protected attachment.

The content of the referral will be discussed with parents/carers where this is appropriate. In general, parents/carers should be informed about any concerns regarding their children. However, from time to time it might not be appropriate to inform them immediately of concerns where that could prejudice an investigation or place the child at further risk.

Parents/carers are unlikely to be told that a referral is being made if physical abuse, sexual abuse or fabricated illness is suspected. In such cases, advice will be sought initially from the appropriate agencies.

Members of staff are aware that they must not discuss any issues with parents/carers unless they are told to do so by an appropriate person.

As a School we take our commitment to attending Child Protection case conferences very seriously. The DSL (Head Teacher) or Deputy DSL will seek to attend and participate in case conferences, but any member of staff may be required to participate. In the unlikely event that we cannot attend, we will always send a written report to the conference to convey latest information and our opinions to the Independent Chair.

The School is always particularly vigilant where concerns relate to children with special educational needs and disabilities, as additional barriers can exist in identifying abuse and neglect in this group of children:

- care should be taken not to assume that indicators of abuse such as behaviour, mood and injury relate only to a child's disability without further exploration

- it is recognised that children with SEN and other disabilities can be more vulnerable to and impacted by behaviour such as bullying even when they don't exhibit any obvious signs of distress
- it is recognised that children with SEN and other disabilities may experience barriers in communicating their concerns and may find it difficult to overcome these without specific support.

Early help and multi-agency working

Early help, as outlined in Chapter 1 of WTSC, is a means of 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. Early help can also prevent further problems arising, e.g. if it is provided as part of a support plan where a child has returned home to their family from care.

Effective early help relies upon the School and local agencies working together to:

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

The MSCB publishes a **threshold document** which includes:

- the process for the early help assessment and the type and level of early help services to be provided
- the criteria, including the level of need, for when a case should be referred to local authority Children's Social Care for assessment and for statutory services under (a) section 17 of the Children Act 1989 (children in need) and (b) section 47 of the Children Act 1989 (reasonable cause to suspect children suffering or likely to suffer significant harm).

The MSCB produces **detailed guidance** on the early help process. However, it must be remembered that NIFS pupils live in a variety of districts in the North West, all of which have their own early help procedures

Where concerns over a child's safety and welfare do not meet the criteria for immediate referral to Children's Social Care, the School will follow the relevant detailed guidance (as above) on early help and multi-agency working. Typically, this will result in the submission of an Early Help form and, depending upon the circumstances of each case and discussions with any other agencies, might lead to the formation of a Team around the Child (TAC).

In 'borderline' cases, i.e. where it is not immediately clear whether to make a referral or proceed via the Early Help framework, the School will consult the relevant Children's Social Care First Response Team for advice. However, and regardless of the precise details of a response in any particular case, the School will always respond to concerns over a child's safety and welfare on the premise that concerns must be always shared.

It is to be hoped that in each case early help will improve the welfare of the child. However, each case will be kept under review, and consideration will be given to a referral to Children's Social Care if the child's situation does not appear to be improving.

Identifying children and families who would benefit from early help

All staff at the School have a role in identifying emerging problems and potential unmet needs of individual children. All staff have a responsibility to identify the symptoms and triggers of abuse and neglect, to share that information and work together to provide children and young people with the help they need. Staff need to continue to develop their knowledge and skills in this area. They have access to appropriate training to identify and respond early to abuse, neglect and complex unmet needs. Training and regular safeguarding updates help them understand their role in identifying emerging problems and sharing information with other professionals to support Early Help Assessment.

The School monitors and evaluates the effectiveness of training and multi-agency training for all early help interventions.

Staff at NIFS should, in particular, be alert to the potential need for early help for any child who:

- is disabled and has specific additional needs
- has special educational needs
- is a young carer
- is showing signs of engaging in anti-social or criminal behavior
- is showing early signs of mental health problems
- is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems and domestic violence
- has returned home to their family from care
- is exhibiting early signs of abuse and/or neglect.

Where a child and family would benefit from coordinated support from more than one agency (e.g. education, health, housing, police), inter-agency assessment will be considered. These early help assessments, such as the Common Assessment Framework, identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

If early help is appropriate, where they are not taking the lead, then the DSL will support the member of staff in liaising with other agencies, and setting up an inter-agency early help assessment, as appropriate.

If any member of staff identifies a child who would benefit from an early help assessment they should alert the DSL utilising the 'NIFS Safeguarding note of Concern'. The initial assessment will be undertaken by the DSL. A decision will be made about who will provide support to the child and family, act as an advocate on their behalf and coordinate the delivery of support services. This 'lead professional role' may be undertaken by the DSL, Deputy DSL, Deputy Head or SENCo. Decisions about who should be the lead professional will be taken on a case by case basis and will be informed by the needs of the child and their family.

For an early help assessment to be effective:

- the assessment should be undertaken with the agreement of the child and their parents or carers. It will involve the child and family as well as all the professionals who are working with them.
- the lead professional should be able to discuss concerns they may have about a child and family with a social worker in the local authority. Local authority Children's Social Care should set out the process for how this will happen.
- if parents/carers and/or the child do not consent to an early help assessment, then the lead professional will make a judgment as to whether, without help, the needs of the child will escalate. If so, a referral into local authority Children's Social Care may be necessary.

The School's arrangements for handling concerns or allegations of abuse against staff

Allegations against or concerns over the behaviour of staff (as defined above) will be dealt with according to the KCSIE (September 2019) and GMSCP guidance.

Such allegations or concerns should be reported immediately to the Head Teacher or Deputy Head Teacher or, in their absence, the Chair of Governors. Where the allegation concerns the Head Teacher, it should be reported directly to the Chair of Governors, without the Head Teacher being informed; the Chair of Governors will then contact the local authority Designated Officer (hereafter Designated Officer) to seek guidance.

Whoever is in receipt of the allegation will decide whether the criteria have been met for an immediate referral to the Designated Officer for an initial discussion. In cases where this is not clear, the allegations or concerns in the first instance will be raised informally with the Designated Officer without identifying individuals. The role of the Designated Officer is to provide advice and preside over the investigation of any allegation or suspicion of abuse directed against anyone working at the School. The Designated Officer's contact details are published at the start of this policy. Allegations against a member of staff who is no longer believed to be working with children will be referred directly to the police when a criminal offence is suspected.

A referral will be always made whenever the allegation meets one or more of the following criteria:

- the adult has behaved in a way which has or may have harmed a child
- the adult has possibly committed a criminal offence against or related to a child
- the adult has behaved towards a child or children in ways which indicate that he or she might pose a risk of harm to children.

Following the initial discussion, a course of action will be agreed with the Designated Officer. If the Designated Officer declines further involvement, the allegation or concern will be dealt with in accordance with the School's internal procedures.

Where the Designated Officer decides that a course of action is required, the School will follow advice and instructions given by the Designated Officer and, more generally, the guidance set down in KCSIE and Part 5 of the GMSCP. This will include taking a decision as to whether the adult concerned should be suspended from his or her work at the School. Suspension will be considered in every case where:

- there is cause to suspect a child is at risk of significant harm
- the allegation relates to a potential criminal offence and warrants investigation by the police
- the allegation is so serious that it might be grounds for dismissal.

Suspension will not be an automatic response or imposed as a 'knee jerk action'; all alternatives to suspension will be properly considered. If the person concerned is suspended, he or she will be given a named contact at the School who will inform them of progress in resolving their case and assess the level of support they require.

Supporting an individual subject to an allegation

A person who is the subject of an allegation will receive effective support from the School, which will do all that it reasonably can to deal with the allegation as quickly as possible, but in a way that is both fair and consistent. The School will inform the person as soon as possible of the allegation and the likely course of action. Advice will be also provided on contacting trade union officials and other sources of support.

Information Sharing

The School emphasises the need for good levels of communication between all members of staff to ensure that a structured procedure for the safeguarding of children will be followed in cases of suspected abuse. The School recognises the importance of information sharing in protecting children from harm and promoting children's well-being.

The School shares information in accordance with the Data Protection Act 1998, the guidance set out in Chapter One of WTSC, and the guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services*. The DSL is trained on the above guidance and works with staff to ensure that (a) fears about sharing information do not stand in the way of the need to promote the welfare and protect the safety of children; (b) they understand and follow this guidance; (c) they feel confident about the ways in which they share information, including with parents, other staff, and external professionals and agencies.

Reporting restrictions

During the course of the investigation the School, in consultation with the Designated Officer, will decide what information should be given to parents, staff and other pupils, and how media enquiries are to be dealt with. Due consideration will be given to the provisions in the Education Act 2011 relating to reporting restrictions on the identification of teachers who are the subject of allegations from pupils.

Keeping all parties informed

All parties will be informed of the course and outcome of any investigation, in accordance with the relevant guidance from statutory agencies and KCSIE.

Referring allegations of abuse to other agencies

If the School dismisses or otherwise ceases to use the services of a person because he or she has harmed a child, poses a risk of harm to children or has committed a relevant offence, it will immediately report this fact to the Disclosure and Barring Service (DBS).

In addition, if the person concerned was a member of teaching staff, the School will consider making a referral to the National College for Teaching and Leadership (NCTL), who will decide whether or not to issue a prohibition order. The School will make a serious incident report to the Charity Commission in accordance with the Commission's guidelines.

Concerns or allegations of abuse against other adults

Where allegations of abuse are made against an adult other than a member of staff at the School, the relevant arrangements set down in GMSCP guidance will be followed.

Allegations of non-recent abuse

The School will report allegations of non-recent abuse to the Police in accordance with KCSIE.

Safeguarding children and whistleblowing

A member of staff who has concerns about the behaviour of another member of staff towards a child, or more general concerns about failings in the School's safeguarding and child protection procedures, should report them in accordance with this policy or, by way of an alternative, following the guidance in the School's Whistleblowing policy. They can be confident that such concerns will be thoroughly investigated. Adverse consequences will not be suffered by anyone who reports a genuine concern in good faith. Where there are allegations of criminal activity, the relevant authorities will always be informed.

The NSPCC has a whistleblowing helpline: contact details at the start of this policy.

Concerns or allegations of abuse against children

These should be handled in accordance with our policy on peer on peer abuse which is contained in **Appendix 1**.

The School's Code of Conduct for Staff

A separate Code of Conduct for Staff has been produced to guide staff in their relationships with pupils. This Code aims to ensure both that staff neither place pupils nor themselves at risk of harm, and that they avoid conduct that might expose them to the risk of an allegation that they have harmed a child. It includes guidance on all aspects of communication with pupils, including social media.

The School's recruitment procedures

The School carries out safer recruitment as set out in KCSIE, the Safeguarding Vulnerable Groups Act 2003 and other relevant safer recruitment guidance to ensure that no-one works within the School who is unsuitable to work with children.

Where the School uses the services of staff employed by other organisations (e.g. contract staff, outdoor pursuits instructors), it ensures that appropriate suitability checks have been carried out, in line with the relevant statutory guidance.

Management of safeguarding at the School

The governing body is responsible for:

- reviewing child protection arrangements and the efficiency with which resulting duties have been discharged
- ensuring that any deficiencies or weaknesses are remedied without delay
- approving amendments in the light of changing regulations or recommended best practice

As part of this the governors ensure that:

- there are in place an appropriately trained DSL and Deputy DSL whose duties are consistent with this policy
- there are appropriate policies and procedures in place for appropriate action to be taken in a timely manner to safeguard and promote children's welfare
- the School's safeguarding arrangements reflect MSCB protocols for assessment and thresholds, and that the School contributes to inter-agency working
- the School's staff recognise the importance of information sharing between professionals and local agencies
- all staff members undergo safeguarding and child protection at induction, their training is regularly updated in line with advice from MSCB, and they receive child protection updates at least annually
- children are taught about safeguarding issues, including online safety, through teaching and learning opportunities
- the School's recruitment processes are in accordance with relevant legislation and statutory guidance referred to in the School's Safer Recruitment Policy

The School also has a lead governor to take leadership and responsibility for safeguarding arrangements (hereafter Lead Governor). The DSL routinely meets with the Lead Governor to scrutinise jointly the Single Central Register and discuss current safeguarding issues.

Designated Safeguarding Lead

The School has appointed a member of its senior leadership team as Designated Safeguarding Lead (DSL). The DSL is ultimately responsible for matters relating to safeguarding, child protection and welfare. Annex B of KCSIE outlines the duties of the DSL which are also set out in the DSL's job description. The School has also appointed a Deputy DSL who will carry out the duties of the DSL if she is unavailable. During term time the DSL or Deputy DSL will always be in School during school hours (8:30 to 4:30). Outside of school hours they will be available by phone if not in School.

The DSL may delegate some responsibilities to appropriate deputies, although ultimate responsibility for safeguarding will always lie with the DSL.

The DSL and Deputy DSL have close links with the MSCB. The DSL also reports at least once a year to the governors on safeguarding and child protection, including on the suitability of this policy

The DSL will:

- make prompt contact, when appropriate, with children's services, or the police (where a potential criminal offence is involved)
- maintain links with the Local Safeguarding Partnership and Designated Officer (LADO)
- maintain staff awareness of child protection procedures and developments in legislation regularly and at least annually.

Training of staff

All staff and volunteers are trained appropriately in safeguarding, including on inter-agency working, and receive, regular updates at least annually, in accordance with procedures laid down by the MSCB.

All new members of staff receive appropriate induction training on their responsibilities in being alert to the signs of abuse and bullying, as well as the procedures for recording and referring concerns to the DSL. They are also briefed on the main points of the safeguarding procedures adopted by MSCB. Safeguarding and child protection training is also given to new governors.

Training is an important part of the induction process. Training includes an overview of this policy, the Code of Conduct for Staff and the Whistleblowing Policy, the School's Anti-bullying Policy and Behaviour Policy, the identity of the DSL and Deputy DSL, Part 1 and Annex A of KCSIE (with which they are provided a copy) and the importance of inter-agency working. Training also makes staff aware of the forms and signs of child abuse, and promotes greater awareness of particular safeguarding concerns, including political/ religious extremism, so-called honour-based violence, female genital mutilation, peer on peer abuse, child sexual exploitation, cyber-bullying, youth produced sexual imagery and mental health. It is the responsibility of the DSL and Deputy DSL to ensure that training is in accordance with latest advice provided by MSCB and other relevant agencies. All staff receive child protection updates at least annually.

Training of the Designated Safeguarding Lead (Head Teacher)

The DSL and Deputy DSL are both fully trained for the demands of their roles, including training in inter-agency working and the conduct of local authority child protection conferences, which meets the requirements of KCSIE. They undergo refresher training every two years and they both have a job description which includes references to their safeguarding roles and other related activities. They also keep up-to-date with safeguarding developments regularly, and at least annually, and this includes regularly attending appropriate courses to ensure that they remain conversant with best practice.

The DSL and Deputy DSL are trained regarding the risks of radicalisation and the identification of pupils at risk of radicalisation, and is trained to provide advice and support to other staff.

Educating pupils about safeguarding

The School seeks to give its pupils an age-appropriate understanding of how to promote both their own safety and well-being and that of other children. This is done through a variety of means, including but not exclusively through the PSHE Scheme of Work, Computing lessons and assemblies. Keeping Children Safe in Education (September 2019) specifies the links between effective safeguarding and a robust SRE/PHSE policy and Scheme of Work. Our curriculum development is in line with the new Ofsted expectations (September 2019).

Online safety

The School protects its pupils when accessing the internet via the School's network through the use of industry-leading firewall and content filtering and monitoring software (RM Safety Net). This system aims to reduce the risk of children:

- being exposed to illegal, inappropriate and harmful material online
- engaging in harmful online interaction with others
- engaging in inappropriate or illegal online behaviour

The School has adopted a whole-school approach to online safety which (a) captures the range and complexity of the risks and of children's experiences of those risks; (b) seeks to mitigate those risks as far as possible without depriving children of the significant benefits provided by technology and the internet, and (c) handles all cases of online harm appropriately with sensitivity. Please refer to the School's E-safety Policy. Guidance for staff on social media and online activity is found in the Code of Conduct for Staff.

Staff are provided with training and guidance to enable them to identify children who may be at risk of harm as a result of their or others' use of technology or the internet. Staff will intervene, where necessary, in such cases appropriately and with sensitivity, and escalate action, where appropriate, in accordance with the School's child protection procedures.

Pupils are taught about E-safety in PSHE lessons and assemblies. Teaching staff are equipped with the knowledge to safeguard pupils by attending online safety training.

Prohibited Items in School

The Head Teacher and authorised staff have a statutory power to search pupils or their possessions, without consent, where they have reasonable grounds for suspecting that the pupil may have a prohibited item. Authorised staff can seize any item found as a result of a search, however found, which they consider prohibited (harmful or detrimental to school discipline).

Prohibited items include:

- knives or other weapons
- alcohol
- illegal drugs
- stolen items
- tobacco and cigarette papers
- fireworks
- pornographic images
- any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, or to cause personal injury to, or damage to the property of, any person (including the pupil concerned).

Arrangements for the implementation and annual review of the School's safeguarding and child protection policy and procedures

Implementation

The School implements this policy through the provision of effective training, record-keeping and consultation across the school community. Consultation includes questionnaires and discussions with pupils, including members of the School Council and other pupil representative bodies.

In addition, implementation also occurs through monitoring and evaluation of both the policy itself and associated procedures and arrangements. This involves but is not restricted to the following:

- governing body meetings and visits to the School
- regular meetings between the DSL and the Lead Governor with specific responsibilities for child protection
- discussions within the Senior Management Team, the Pastoral Team and the Pastoral and Welfare Committee
- review of all relevant records.

Annual review

The governors carry out an annual review of this policy and relevant procedures and arrangements at its meeting in the summer term. Prior to the governors' review, the DSL and Deputy DSL meet with the Lead Governor to review in detail the effectiveness of this policy and relevant procedures and other arrangements. The Lead Governor reports the findings of this meeting to the governors as part of the review itself.

In addition to considering the report of the Lead Governor, the Annual Review consists of direct questioning of the DSL (Head Teacher) on the School's safeguarding policy and procedures, etc. and, where necessary, the requirement to make appropriate amendments.

The School's arrangements to fulfil its other safeguarding and welfare responsibilities

Promoting awareness

The School's curriculum and pastoral systems are designed to foster the spiritual, moral, social and cultural development of all our pupils. All staff play a vital role in this process, helping to ensure that all pupils relate well to one another and feel safe and comfortable within the School. We expect all staff to lead by example and to play a full part in promoting an awareness, appropriate to their age, amongst all our pupils on issues relating to health, safety and well-being. In addition, staff have an important role in ensuring that pupils follow the standards set out in our Behaviour Policy and our Anti-Bullying Policy.

Time is allocated in PSHE to discussions of what constitutes appropriate behaviour and why bullying and lack of respect for others is never right. Assemblies, drama and other lessons (e.g. ICT) are used to promote tolerance, mutual respect and understanding, including a sympathetic appreciation of other faiths and cultures, and embed fundamental British values of democracy, the rule of law and individual liberty.

They also include specific advice to children as to how to keep themselves safe, especially when using electronic equipment and accessing the internet.

The School recognises its obligations, under the Counter-Terrorism and Security Act 2015, to prevent its pupils from being drawn into terrorism and develop their resilience to extremist ideologies. The School works in partnership with the LSCB and other agencies to make staff aware of how to protect children who may be vulnerable to radicalisation or exposed to extremist views.

All pupils know that there are adults to whom they can turn to if they are worried. The names and identities of these individuals, including the School medical staff, are displayed across the School. Our support to pupils includes the following:

- information as to whom a child might turn for advice, including confidential helplines and web addresses for external specialists such as ChildLine, is displayed across the School
- regular lessons on E-safety and ensure that all pupils understand and adhere to the School's policies in this area.

Looked-after children

A looked-after child is a child who is looked after by a local authority, subject to a care order or who is voluntarily accommodated by a local authority.

The School appoints the DSL (Head Teacher) as designated member of staff to safeguard and promote the welfare of each Looked After Child at the School.

In addition, the particular needs of looked-after children are included in staff induction and training. See also **Appendix 2**.

Staff working in specialist settings within the School

A number of staff members will work with pupils in specialist settings, which can include one-to-one tuition.

Consequently, the School provides training for staff working in these settings to ensure that pupils are properly safeguarded. In addition, the School's Code of Conduct for staff provides further guidance to all staff on the conduct of one-to-one tuition and pre-arranged meetings with pupils.

Children missing from education

The School's arrangements for safeguarding pupils missing from education are detailed and important and are set out in full in **Appendix 2**.

Security

In the interests of security, staff and volunteers must display their identity cards whilst in school. A separate system of ID cards exists for visitors, who must be accompanied by a member of staff at all times when on the school site. Any person not displaying the relevant identity card can expect to be challenged and, in the event of an unsatisfactory explanation, escorted from the premises.

Monitoring and evaluation

The Head Teacher is responsible for the on-going monitoring and evaluation of the effectiveness of this policy and its implementation, taking account of feedback from pastoral staff, pupils and parents. The Senior Leadership Team meets annually to review the effectiveness of the policy. The policy and its implementation is reviewed annually by the Governing Body.

Lead Governor for Safeguarding: Steve Foster

This policy was last reviewed and approved by the full Governing Body Autumn term 2019

APPENDIX 1

Additional specific safeguarding issues

Peer on Peer Abuse

All staff should be alert to the risk of peer on peer abuse and understand their role in preventing, identifying and responding to it. Staff should know that children are capable of abusing their peers, they should never dismiss abusive behaviour as a normal part of growing up, or 'banter', and should not develop high thresholds before taking action. Peer on peer abuse should be taken as seriously as abuse by adults.

What is peer on peer abuse?

For these purposes, peer on peer abuse is any form of abuse perpetrated by a child towards another child. It can take many different forms including, but not limited to, serious bullying (including cyber-bullying¹), relationship abuse², domestic violence³, child sexual exploitation⁴, youth and serious youth violence⁵, harmful sexual behaviour⁶, and gender-based violence⁷.

These categories of abuse rarely take place in isolation and often indicate wider safeguarding concerns. For example, a teenage girl may be in a sexually exploitative relationship with a teenage boy who is himself being abused by a family member or by older boys. Equally, while children who abuse may have power over those who they are abusing, they may be simultaneously powerless to others.

What role does gender play?

¹ Please see the School's anti-bullying policy

² <https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>

³ This type of abuse relates to abuse between children aged 16 and 17 who are or have been intimate partners or family members. The abuse includes but is not limited to psychological, physical, sexual, financial and emotional

⁴ This is a form of sexual abuse where children are sexually exploited for money, power or status. This abuse can be perpetrated by other children or by adults. It can involve violent, humiliating and degrading sexual assaults. In some cases, children are persuaded or forced into exchanging sexual activity or money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual activity with the person who is exploiting them. Child sexual exploitation does not always involve physical contact and can happen online.

⁵ Serious youth violence is any of the most serious offences where the victim is aged 19 or below, including murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. Youth violence also includes assault with injury offences.

⁶ This is any sexual behaviour by a child or young person which is outside of developmentally 'normative' parameters. This can (but does not always) include abusive behaviour such as sexual assaults.

⁷ This is violence that is directed against one gender as a result of their gender.

Peer on peer abuse often manifests itself differently for boys than it does for girls. For example, girls seem to be at greater risk of sexual assault and/or exploitation, whereas boys seem to be at greater risk of physical gang-related violence and serious youth violence.

When does behaviour become abusive?

It can be difficult to distinguish between abusive behaviour which should be dealt with in accordance with the procedure set out below, and behaviour which does not constitute abuse,

such as low-level bullying (where the School's anti-bullying policy should be followed) or age appropriate sexual experimentation.

Factors which may indicate that behaviour is abusive include (a) where it is repeated over time and/or where the perpetrator intended to cause serious harm; (b) where there is an element of coercion or pre-planning; and (c) where there is an imbalance of power, for example, as a result of age, size, social status or wealth. This list is not exhaustive and staff should always use their professional judgment and discuss any concerns with the DSL.

Staff should always be alert to possible signs of abuse. Signs that a child may be suffering from peer on peer abuse overlap with those relating to other types of abuse. They may include (a) failing to attend school, disengaging from classes or struggling to carry out school related tasks to

the standard you would ordinarily expect; (b) physical injuries; (c) having difficulties with mental health and/or emotional well-being; (d) becoming withdrawn, shy, experiencing headaches, stomach aches, anxiety, panic attacks, suffering from nightmares or lack of sleep or sleeping too much; (e) drugs and/or alcohol use; (f) changes in appearance and/or starting to act in a way that is not appropriate for the child's age. Again, this list is not exhaustive and the presence of one more of these signs does not necessarily indicate abuse.

Are some children particularly vulnerable to abusing or being abused by their peers?

Any child can be affected by peer on peer abuse and staff should be alert to signs of such abuse amongst all children. Research suggests that (a) peer on peer abuse is more prevalent amongst children aged 10 and older although it also affects younger children, including by way of harmful sexual behaviour; (b) children who are particularly vulnerable to abuse or to abusing others include those who have (i) witnessed or experienced abuse or violence themselves; (ii) suffered from the loss of a close family member or friend; (iii) experienced considerable disruption in their lives.

What should I do if I suspect either that a child may be being abused, or that a child may be abusing others?

If a member of staff thinks, for whatever reason, that a child may be at risk of abuse from another child or young person, or that a child may be abusing others, the member of staff should report their concern to the DSL without delay. If a child is in immediate danger or at risk of harm, a referral to Children's Social Care and/or the police should be made immediately.

How will the DSL respond to concerns of peer on peer abuse?

The DSL will discuss the behaviour with the member of staff and will where necessary take any immediate steps to ensure the safety of the victim(s) or any other child.

Where the DSL considers or suspects that the behaviour might constitute abuse children's social care should be contacted immediately and in any event within 24 hours of the DSL becoming aware of it. The DSL will discuss the incident with children's social care and agree on a course of action, which may include (a) taking any steps to ensure the safety and well-being of any children affected; (b) further investigation; (c) referral to other agencies such as the police (where a crime may have been committed), CAMHS, a specialist harmful sexual behaviour team and/or youth offending services; and (d) a strategy meeting.

Any response should be decided in conjunction with children's social care and other relevant agencies and should:

- investigate the incident and the wider context and assess and mitigate the risk posed by the perpetrator(s) to the victim(s) and to other children
- consider that the abuse may indicate wider safeguarding concerns for any of the children involved
- treat all children (whether perpetrator or victim) as being at risk – while the perpetrator may pose a significant risk of harm to other children, the child may also have considerable unmet needs and be at risk of harm themselves
- take into account the complexity of peer on peer abuse and of children's experiences and consider the interplay between power, choice and consent. While children may appear to be making choices, if those choices are limited they are not consenting.
- take appropriate action in respect of the perpetrator – any action should address the abuse, the causes of it and attitudes underlying it. Factors to consider include: the risk the perpetrator(s) poses and will continue to pose to other children, their own unmet needs, and the severity of the abuse and the causes of it. Disciplinary action may be appropriate, including (a) to ensure that the perpetrator takes responsibility for and realises the seriousness of his or her behaviour; (b) to demonstrate to the perpetrator and others that abuse can never be tolerated; and (c) to ensure the safety and well-being of the victim and other children in the School. Permanent exclusion will only be considered as a last resort and only where necessary to ensure the safety and well-being of the victim(s) and other children in the School.
- in the case of a concern about or an allegation against a pupil, the School may suspend the pupil where it deems it appropriate while an investigation takes place
- provide on-going support to victim(s) including by (a) ensuring their immediate safety; (b) responding promptly and appropriately to the abuse; (c) assessing and addressing any unmet needs; (d) following the procedures set out in the safeguarding policy (including where the child is in need of early help or statutory intervention); (e) monitoring the child's well-being closely and ensuring that support is provided by all relevant staff members within the School; (f) engaging with the child's parents and any external agencies to ensure that the child's needs are met in the long-term.
- consider the lessons that can be learnt from the abuse and put in place measures to reduce the risk of such abuse recurring. This may include, for example: gender and equalities work, work around school safety, security and supervision, awareness raising

- for staff, pupils and parents about a particular form of abuse, training for staff on handling certain types of incidents or abuse.

How does the School raise awareness of and reduce the risk of peer on peer abuse?

The School actively seeks to prevent all forms of peer on peer abuse by educating pupils and staff, challenging the attitudes that underlie such abuse, encouraging a culture of tolerance and respect amongst all members of the school community, and responding to all cases of peer on peer abuse and any cases of bullying (no matter how trivial) promptly and appropriately.

Pupils are educated about the nature and prevalence of peer on peer abuse via PSHE. They are told what to do if they witness or are victims of such abuse, the effect that it can have on the victims and the possible reasons for it, including vulnerability of the perpetrator.

They are regularly informed about the School's approach to such issues, including its zero tolerance policy towards all forms of bullying and peer on peer abuse.

Staff are trained on the nature, prevalence and effect of peer on peer abuse, and how to prevent, identify and respond to it.

Sexual violence and sexual harassment between children in schools and colleges

In instances of peer on peer abuse where pupils are involved in harmful or abusive sexual behaviour the School will follow the Department for Education *Advice on Sexual Violence and Sexual Harassment Between Children in Schools and Colleges* (May 2018).

What is meant by sexual violence and sexual harassment?

- Sexual violence and sexual harassment can be between two children, or a group of children.
- Both sexes may be affected.
- Children with SEND are likely to be more vulnerable.
- Sexual violence refers to rape, assault by penetration or sexual assault.
- Sexual harassment includes such things as sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone, or displaying photos of a sexual nature; and online activity including sharing of images or video (sexting) or making inappropriate sexual comments (Note - this list is not exhaustive).
- Harmful sexual behaviours in children are those which are inappropriate, problematic, abusive and violent.
- When considering harmful sexual behaviour, the ages and developmental stages of the children involved are always considered.

Responding to reports of sexual violence and sexual harassment

- Reports of sexual violence are often complex and require difficult decisions to be made to appropriately safeguard children. Decisions will be made by the School on a case-by-case basis, with the DSL taking a leading role, and supported by other agencies such as children's social care or the police.

- Some situations are, however, statutorily clear: a child under the age of 13 can never consent to sexual activity (the age of consent is 16); sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

The immediate response to a report of sexual violence or sexual harassment

- The initial response to a disclosure is important. The School will ensure that the victim is taken seriously and supported.
- Staff should always discuss with the DSL concerns about sexually harmful behaviour involving pupils.
- Where an incident between two pupils takes place away from the School, the School's safeguarding duties remain the same.
- The School will take reasonable measures to protect the anonymity of any pupils involved in any report of sexual violence or sexual harassment, including considering the impact of social media.
- The School will make a risk assessment in any case of a report of sexual violence, considering the victim, alleged perpetrator and other pupils at the school.
- Risk assessments will be kept under review. In cases of sexual violence a professional risk assessment by external specialists may be required, and will be used to inform the school's own risk assessment.
- It is important that sexual violence and sexual harassment are shown to be unacceptable, and not passed off as 'banter' or 'part of growing up'.
- While the facts are being established, the School will remove the alleged perpetrator from any classes shared with the victim, and consider how best to keep them a reasonable distance apart, in the best interests of both pupils.
- The School will also consider carefully when to inform the alleged perpetrator, and this may be discussed with relevant agencies.

There are four likely routes to consider when managing a report of sexual violence or sexual harassment

- **Managing internally:** in some cases of sexual harassment (such as one-off incidents) the School may manage the incident internally;
- **Early help:** this is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation;
- **Referrals to Children's Social Care:** in cases where there has been harm, or there is an immediate risk, a referral will be made to Children's Social Care;
- **Reporting to the police:** in cases where rape, assault by penetration or sexual assault is reported the School will not wait for the outcome of a police investigation before protecting the victim, perpetrator and other pupils in the School. The DSL will work closely with the police to ensure that the School's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the School will update the risk

assessment and consider suitable action through its Behaviour, Rewards and Sanctions Policy.

The School is mindful of the importance of ensuring that the victim and perpetrator remain protected, especially from bullying or harassment. Where no further action is taken by the police, or a pupil found not guilty, the School will continue to support the victim and perpetrator.

Contextual safeguarding

The School understands the value of contextual safeguarding in helping to prevent peer-on-peer abuse. Contextual safeguarding is an approach to understanding, and responding to, children's experiences of significant harm beyond their families. It recognises that the different relationships that children form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers sometimes have little influence over these contexts, and children's experiences of extra-familial abuse can undermine parent-child relationships.

Therefore safeguarding practitioners need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual safeguarding, therefore, expands the objectives of child protection systems in recognition that children are vulnerable to abuse in a range of social contexts.

Youth-produced sexual imagery (Sexting)

This refers to the creating and sharing of sexual imagery by young people. Creating and sharing sexual photos and videos of under-18s is illegal and therefore causes the greatest complexity for schools and other agencies when responding. It also presents a range of safeguarding risks which need careful management.

The term 'youth-produced sexual imagery' (YPSI) is now used instead of 'sexting.' This is to ensure clarity. The types of incidents which this covers are those where a person under the age of 18:

- creates and shares sexual imagery of themselves with a peer under the age of 18
- shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult
- is in possession of sexual imagery created by another person under the age of 18

As it is a criminal offence to possess, distribute, show and make indecent images of children, any disclosure of information about an incidence of YPSI will always be taken very seriously by the School. The Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18.

When an incident involving youth-produced sexual imagery comes to the School's attention:

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate school staff
- there will be subsequent 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.

At any point in the process if there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to Children's Social Care and/or the police immediately.

An immediate referral to police and/or Children's Social Care will also be made if at this initial stage:

- 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 is known about the imagery suggests violent content
- the imagery involves sexual acts and any pupil in the imagery is under 13
- there is reason to believe a young person is at immediate risk of harm because of the sharing of the imagery, e.g. the young person is presenting as suicidal or self-harming.

If none of the above applies, then the School may decide to respond to the incident without involving the police or Children's Social Care. However, the School can choose to escalate the incident at any time if further information/concerns come to light.

The decision to respond to the incident without involving the police or Children's Social Care will be made in cases when the DSL is confident that (a) there is enough information available to assess the risks to pupils involved, and (b) the risks can be managed within the school's pastoral support and disciplinary framework and, if appropriate, their local network of support.

The decision will be made by the DSL (Head Teacher). Input from other members of staff will be considered, if appropriate. The decision will be recorded, in accordance with school policy.

Any decision will be in line with the School's child protection procedures and will be based on consideration of the best interests of the young people involved. This will take into account proportionality as well as the welfare and protection of the young people. The decision will be reviewed throughout the process of responding to the incident.

During the course of any investigation into YPSI the School will follow the guidance [here](#), published by the UK Council for Child Internet Safety.

'Upskirting' (Keeping Children Safe in Education September 2019) typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. All staff should be alert to the risk of 'upskirting' and understand their role in preventing, identifying and responding to it.

Serious violence (Keeping Children Safe in Education September 2019) All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should understand the measures in place to manage them.

Radicalisation and violent extremism

We are committed to protecting our pupils from the malign influence of violent political and religious extremism. Further, the School recognises its obligations under the Prevent Duty and the importance of acting in accordance with Prevent Duty Guidance.

The School's Prevent Strategy document is published to staff on the school network. Copies are also available on request from the Pastoral Deputy Head.

The School's Prevent Strategy undertakes to:

- risk assess the likelihood of pupils being drawn into terrorist organisations
- work with parents and community leaders to protect children from being drawn towards violent extremism
- provide appropriate Workshop on the Prevent Strategy (WRAP) training for staff to raise awareness of how to identify children who may be at risk of radicalisation and what can be done to support them.
- work in partnership with the LSCB to protect children who may be at risk
- keep under review its IT policies to ensure that children are protected from online extremist material
- build its pupils' resilience, not only through its PSHE and other curricular provision, but also the its distinctive ethos and education, equipping them to question and challenge extremist ideologies
- ensure that visiting speakers are appropriately vetted and supervised.

Staff must be particularly vigilant and will report any concerns they have about radicalisation and violent extremism to the DSL. The DSL will then make a referral to the relevant authorities in accordance with Greater Manchester Safeguarding Partnership guidance Safeguarding .

Children and Young People Vulnerable to Violent Extremism

To support its work in this area, the DSL and other members of the pastoral team have received specialist training from relevant external agencies.

Arrangements for visiting speakers

The School has clear protocols for ensuring that any visiting speakers are suitable and appropriately supervised. The School'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 the School and British values.

The School undertakes a risk assessment before agreeing to a visiting speaker being allowed to attend the School. This takes into account any vetting considered appropriate in the circumstances.

All visiting speakers are 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 or additional information in advance of the session being provided.

Visiting speakers, whilst on the School site, are supervised by a school employee.

Child sexual exploitation

Child sexual exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator

always holds some kind of power over the victim which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyber-bullying and grooming. However, it is also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

Once again, staff should be especially vigilant to signs and other evidence that a child is or is at risk of becoming a victim of CSE and report their concerns immediately to the DSL. The DSL will then make a referral to the relevant authorities in accordance with agreed inter-agency procedures.

So-called 'honour-based' violence

So-called 'honour-based' violence (HBV) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. All forms of so-called HBV are abuse, regardless of the motivation, and should be handled and escalated as such.

There is a range of potential indicators that a child may be at risk of HBV. If in any doubt, staff should speak to the DSL. Staff at NIFS need to be alert to the possibility of a child being at risk of HBV, or already having suffered HBV.

Members of staff who have a concern regarding a child who might be at risk of any form of HBV must report this to the DSL who will activate local safeguarding procedures, using their protocols for multi-agency liaison with police and social care.

(a) Forced marriage

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some 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. There are a range of potential indicators that a child may be at risk of forced marriage. School staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fm@fco.gov.uk

(b) Female genital mutilation (FGM)

All staff need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Staff will come into contact with female pupils from other schools. In addition, our own pupils might talk about or disclose information about FGM in their own families and communities.

Where staff suspect that a girl is at risk of FGM, they must report this to the DSL without delay. The DSL will then activate the relevant safeguarding procedures, using Greater Manchester Safeguarding Partnership document Female Genital Mutilation Multi-Agency Protocol.

Where a teacher discovers that FGM appears to have been carried out on a girl under the age of 18, they have a statutory duty to report this directly to the police. Any teacher failing to report such cases will face disciplinary sanctions. Unless teachers have good reason not to do so, they should discuss any such case with the DSL or children's social care, in accordance with the **Procedures for Dealing with Concerns about a Child** set out elsewhere in this policy. In addition, staff should alert the DSL in the following situations:

- if a girl under 18 appears to be at risk of FGM
- suspected cases (i.e. where the teacher has not discovered that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence)
- in the case of a woman who is 18 or over, any instance of suspected FGM or risk of FGM.

The DSL who will follow local safeguarding procedures.

Modern slavery

Slavery is not an issue confined to history or an issue that only exists in certain countries – it is something that is still happening today. It is a global problem and the UK is no exception. It is a growing issue, affecting men, women and children. Modern slavery encompasses slavery, servitude, forced and compulsory labour and human trafficking. Traffickers and slave drivers coerce, deceive and force individuals against their will into a life of abuse, servitude and inhumane treatment.

Reporting modern slavery

There is a duty on schools, along with other public authorities to notify the Home Office where modern slavery is encountered. NIFS makes all its staff aware of the safeguarding challenges to children posed by modern slavery and the duty to refer.

There are two routes to reporting: either through a National Referral Mechanism (NRM) form or using an MS1 form.

Where a report needs to be made of a child who has experienced modern slavery:

- the NRM form should be used if the reporting adult gives their consent to be identified; this form should be sent to nrm@nca.x.gsi.gov.uk. To access the form, click [here](#).
- the MS1 form should be used if the reporting adult wishes to remain anonymous; the form should be sent to dutytonotify@homeoffice.gsi.gov.uk. To access the form, click [here](#).

For more information see also the MSCB modern slavery resource.

Child Trafficking and Exploitation

Child trafficking is child abuse. Children are recruited, moved or transported and then exploited, forced to work or sold. Children are trafficked for:

- sexual abuse
- benefit fraud
- forced marriage
- domestic servitude such as cleaning, childcare, cooking
- forced labour in factories or agriculture
- criminal activity such as pick-pocketing, begging, transporting drugs, working on cannabis farms, selling pirated DVDs, bag theft. This may involve so called 'county lines' exploitation of children and young adults.

Many children are trafficked into the UK from abroad, but children can also be trafficked from one part of the UK to another.

Independent child trafficking advocates

Independent child trafficking advocates (ICTAs) are professionals who support children who have potentially been trafficked. The role of the ICTA is outlined in section 48 of the Modern Slavery Act 2015, and the interim guidance 'Child trafficking advocates: early adopter sites' issued by the government.

All local authorities in **Greater Manchester** are early-adopter sites of ICTAs. This means that all children identified as potentially trafficked in these areas must be referred to Barnardo's ICTAs Service. An ICTA will be allocated and make contact with the child within 24 hours. Making a referral quickly after identification could support reductions in missing children and re-trafficking.

To make a referral

Call the 24/7 Referral Line **0800 043 4303** - the ICTA Service will support you in making the referral over the phone. Alternatively send a completed referral form to the secure mailbox (for cjsm compatible accounts only) trafficking.referrals@bypmk.cjsm.net

The Trafficking Referral Form can be found at www.gov.uk/child-trafficking

Further details can be found in the *Independent Child Trafficking Advocate Service* leaflet issued by Barnardo's. All staff at NIFS are aware of this duty to refer.

For more information see also the MSCB child trafficking resource.

APPENDIX 2

Children missing from education

The School is committed to ensuring that its pupils access the educational and other opportunities it provides. In this context, it recognises that a pupil missing education is at significant risk of underachieving, being a victim of maltreatment, including abuse, and suffering a reduction in his life chances when he leaves the School. The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This 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.

The School will act in accordance with the guidance provided in KCSIE. In particular, it will inform their local authority of any pupil who is going to be deleted from its admission register where he:

- has been taken out of school by his parents and is being educated outside the school system e.g. home education
- has ceased to attend school and no longer lives within reasonable distance of the School
- has been certified by the school medical officer as unlikely to be in a fit state of health to attend school before ceasing to be of compulsory school age, and neither he nor his parent has indicated the intention to continue to attend the School after ceasing to be of compulsory school age
- is in custody for a period of more than four months due to a final court order and the School does not reasonably believe he will be returning to the School at the end of that period
- has been permanently excluded.

Set out below are the procedures the School will follow in seeking to prevent a child missing education and the remedial action it will take where it is required.

Suspicious of maltreatment and abuse

Where it is suspected that a pupil might be missing education because he is suffering from maltreatment, including abuse, the School will follow the procedures set down in its Safeguarding and Child Protection Policy.

Registration of pupils

Each pupil's attendance is monitored through the daily register, taken in the morning and at the start of the afternoon session.

Where a pupil has not registered at the start of the school day and the School has not received notification of absence from his parent/carer, an automated text message will be generated alerting the parent/carer to the pupil's non-arrival. In the event that a text message cannot be sent, or that the pupil's whereabouts continue to remain unknown, the Attendance Officer supported where necessary by other staff will call the parent/carer to obtain clarification. School attendance registers are carefully monitored to identify any trends. The School will inform the local authority 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.

Each pupil's attendance is recorded on the school's information management system and included on his school report.

Further action taken by the School

The attendance of all pupils is monitored by the Attendance Officer. Any pupil whose attendance falls below ninety per cent from the start of each academic year is brought to the attention of the Head Teacher for investigation.

Unexplained absences, or absences which are not explained to the School's satisfaction, will be investigated by the Attendance Officer in conjunction with the Head Teacher.

All staff must also be aware of their role to prevent children from going missing from education. The School will take appropriate action to find any pupil who is discovered to be missing from the School. The DSL should normally be informed in the first instance and will co-ordinate the action taken. A written record is made of any incident of a pupil missing from the School, the action taken, and any reasons given by the pupil for being missing.

The School will ensure that any pupil currently on the Child Protection Register who is absent without explanation for two days is referred to Children's Services.

Looked-after children

The attendance record of any pupil who is also a Looked After Child will be monitored by the Attendance Officer. In addition, the Attendance Officer will return attendance data as and when required by the local authority.

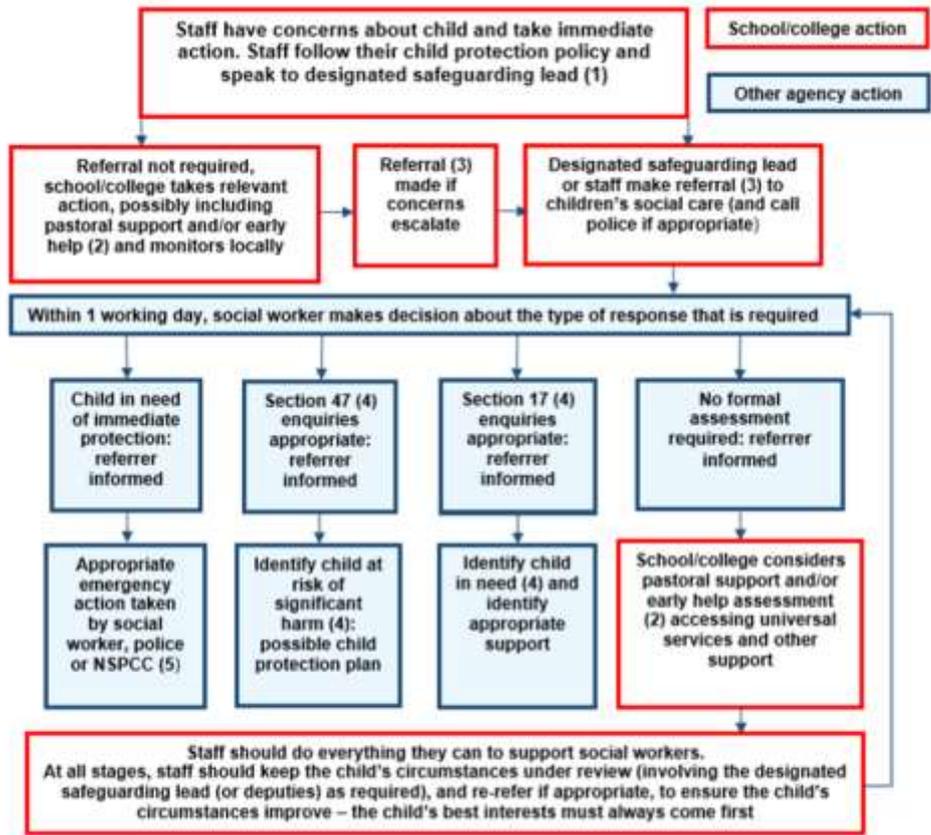
Pupils whose attendance is a cause for concern

A list of pupils whose attendance and/or punctuality is a cause for concern, together with those who are Looked After, will be maintained by the Attendance Officer. The Attendance Officer will monitor this list on a daily basis and report absences to the Head Teacher for further action.

In the event that a pupil of compulsory school age fails to attend the School regularly or has been absent from the School without authorisation for a continuous period of not less than ten days, the School will inform the local authority and provide it with the pupil's name and address.

The local authority will be informed of the name and address of any pupil who is deleted from the admission register.

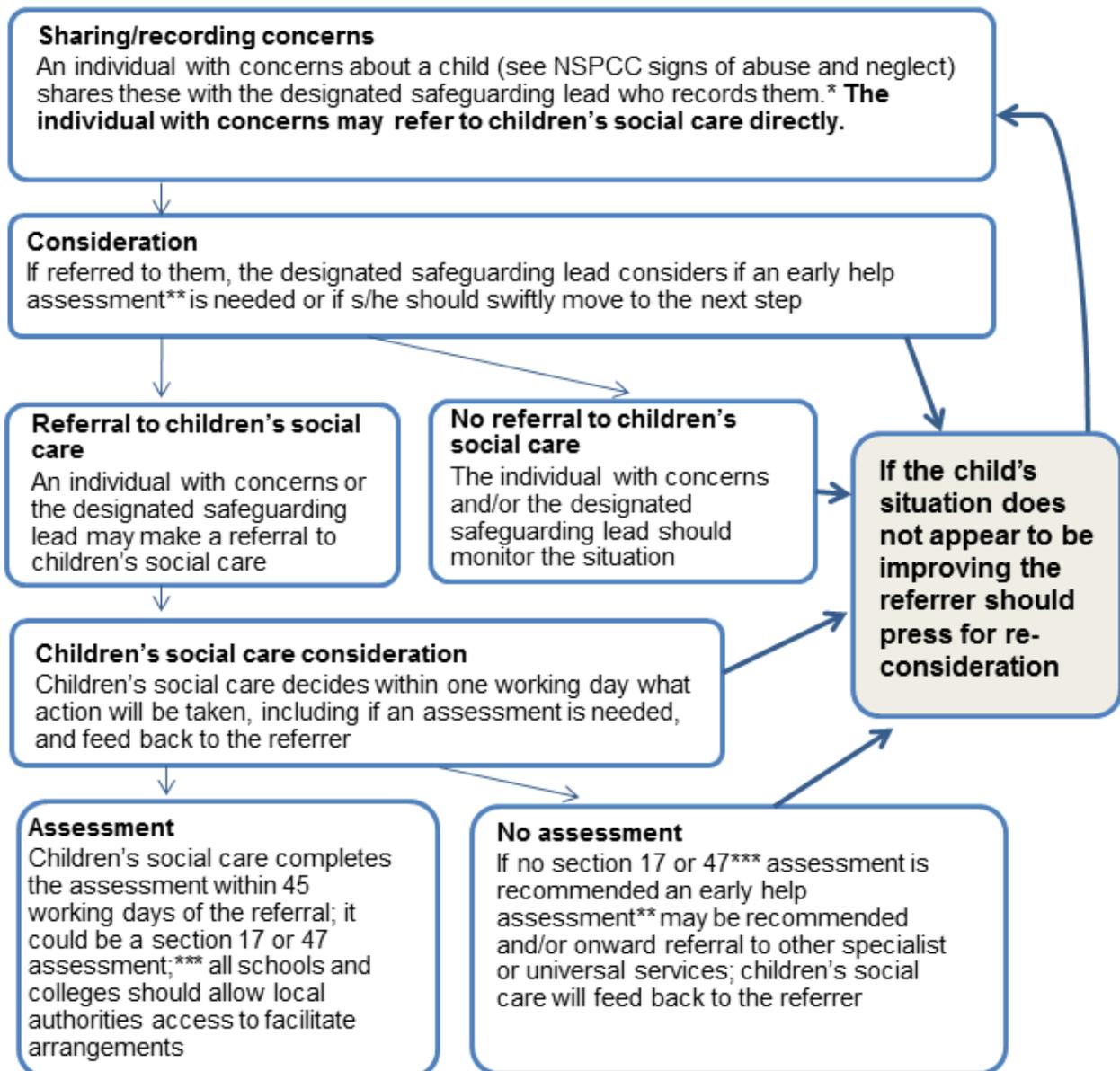
APPENDIX 3: Action when there are concerns over a child’s welfare or suspicions of abuse



Action when a child has suffered or is likely to suffer harm

This diagram illustrates what action should be taken and who should take it when there are concerns about a child. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately.

Anybody can make a referral.



* In cases which also involve an allegation of abuse against a staff member, see part four of this guidance which explains action the school or college should take in respect of the staff member

** Where a child and family would benefit from coordinated support from more than one agency (eg, education, health, housing, police) there should be an inter-agency assessment. These assessments should identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989. The early help assessment should be undertaken by a lead professional who could be a teacher, special educational needs coordinator, General Practitioner (GP), family support worker, and/or health visitor.

*** Where there are more complex needs, help may be provided under section 17 of the Children Act 1989 (children in need). Where there are child protection concerns local authority services must make enquiries and decide if any action must be taken under section 47 of the Children Act 1989.