HARROW INDEPENDENT COLLEGE

School of Mathematics, Science & Economics

SAFEGUARDING AND CHILD PROTECTION POLICY AND PROCEDURE FOR HARROW INDEPENDENT COLLEGE (HIC)

This document has been adapted from the

HSCB model policy and procedure

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COLLEGE POLICY

1.Introduction – legislative framework

HIC is fully committed to meeting its responsibility to protect and safeguard the welfare of children and young people in its care. We recognise the important part we have to play in identifying children and young people at risk of abuse and neglect and in securing appropriate support for them and their families.

Safeguarding and promoting the welfare of children is defined in the Department for Education's (DfE) statutory guidance 'Keeping Children Safe in Education' (KCSE) as:

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
- Taking action to enable all children to have the best outcomes

'Children' includes everyone under the age of 18.

'A child centred and coordinated approach to safeguarding'

The child's best interests will remain our paramount focus and this is best achieved by HIC working within the context of the following statutory duties and government guidance which require effective inter-agency cooperation:

Section 175 of the Education Act 2002 places a statutory duty on the governing body to have policies and procedures in place that safeguard and promote the welfare of children who are pupils of the school.

Section 11 Children Act 2004 sets out the arrangements that schools and other specified settings must make to safeguard and promote the welfare of children. These arrangements are outlined within this document so that all staff, families and the local community are provided with a clear understanding of our school's processes and commitment to safeguard and promote the welfare of children and young people in our care.

Children and Social Work Act 2017 brought about a new partnership arrangement to safeguard children. Harrow Safeguarding Partnership Arrangement oversees a collaborative approach by Harrow Safeguarding Children Board and Harrow Safeguarding Adults Board in order to promote a 'Think Whole Family' approach to safeguarding. As a relevant agency HIC is committed to fulfilling its statutory duty to engage with these arrangements.

All staff which includes headteachers, teachers, non-teaching/support staff and the governing body are required to read part 1 of statutory guidance Keeping Children Safe in Education which sets out the legal duties staff must follow to safeguard and promote the welfare of children and young people under the age of 18 in our school.

KCSE incorporates a range of related responsibilities for schools and statutory duties introduced to protect children and young people. Our policy and procedure is written in accordance with KCSIE and similarly should be read by all staff. Our policy and procedure

also reflects government advice [What to do if you're worried a child is being abused – Advice for practitioners]

It is also expected that all staff are made aware of related internal school policies including: the student code of conduct and staff code of conduct.

2. Key Contacts

(i) Safeguarding and Promoting the Welfare of Children at HIC:

Role	Name	Telephone
Designated Safeguarding Lead (DSL)	Miss Sandhya Parameswaran	02084236227 Extn 204
Deputy DSL	Mr Kandiah Kandeepan	02084236227 Extn 202

(ii) Key local contacts for safeguarding children

Harrow Children's Social Care & Multi-agency Safeguarding Hub (MASH)	**'Golden Number': 020 8901 2690** Emergency Duty Team: weekends, bank holidays and between 5pm-9am during the week: **020 8424 0999**
Police	**101 or for emergency: 999**
FGM - Mandatory reporting	**Police on 101,** the national FGM helpline 0800 028 3550
Local Authority Designated Officer for Allegations against staff (LADO)	Initial referrals via **MASH/Golden Number** above. (For on-going cases: **020 8736 6435**)
Children and Young People with Disabilities 0-25 years	**020 8966 6481**
Local multi-agency procedures, guidance, and Training: Harrow Strategic Safeguarding Partnership	**www.harrowscb.co.uk/**
NSPCC	**0800 800 5000**
Report Abuse in Education NSPCC Helpline	**0800 136 663**
Childline	**0800 1111**
Government's Whistle-blowing Service via NSPCC Report Line	**0800 028 0285**
Forced Marriage Unit	**Tel: 020 7008 0151**

	From overseas: +44(0)20 7008 0151 (Mon-Fri 9am-5pm) Out of hours: 020 7008 1500 (ask for Global Response Centre) Email: fmu@fco.gov.uk
Support and Advice about Extremism DfE helpline (non-emergency advice for staff and governors)	**Tel: 020 7340 7264** Email: counterextremism@education.gsi.gov.uk
Disclosure and Barring Service	**Tel: 03000 200 190** Email: customerservices@dbs.gov.uk
Teaching Regulation Authority	**Tel: 020 7593 5392** Email: misconduct.teacher@education.gov.uk

In the first instance, contact with external agencies should be made via the DSL, where possible.

3. HIC's Safeguarding Mission Statement

All staff at HIC understand that safeguarding children is everyone's responsibility.

We will:

- Provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.
- Always act in the best interests of the child, taking their wishes and feelings into account.
- Ensure that all staff and volunteers are recruited using robust 'Safer Recruitment' processes (See HIC's **Safer Recruitment Policy**).
- Aim to identify concerns early and prevent concerns from escalating. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, providing the lead professional in undertaking an early help assessment. See Appendix 1 and Harrow's Early Support Offer.

- Establish and maintain an environment where children feel respected, safe, and are encouraged to talk and be listened to when they have a worry or concern.
- Require any member of staff who has a concern about a child's welfare to follow the referral process set out in this document.
- Recognise that children may not always disclose abuse and that this should not stop staff having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL).
- Where there is a safeguarding concern, take the child's wishes and feelings into account at all stages of the process of intervention.
- Ensure that children who have been abused or neglected will be supported in line with a child protection plan.
- Work with parents/carers to build a supportive relationship and be clear about our Safeguarding and Child Protection Procedures and in particular, when we may need to refer concerns to other agencies.
- Include opportunities across the curriculum, including PSHE for children to be taught about safeguarding and to develop the skills they need to recognise danger and know where to seek help.
- Maintain an attitude of "it could happen here" where safeguarding is concerned.

3.1 Why is this important to our college?

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and serious case reviews have repeatedly shown the dangers of failing to take effective action. Examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect;
- poor record keeping;
- failing to listen to the views of the child;
- failing to re-assess concerns when situations do not improve;
- not sharing information or sharing information too slowly and;
- a lack of challenge to those who appear not to be taking action.

3.2 Contextual Safeguarding

We recognise that some safeguarding incidents or behaviours are associated with wider environmental factors which relate to children and young peoples' neighbourhoods and/or online communications. Contextual Safeguarding expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts. For further information see the University of Bedfordshire's Contextual Safeguarding Network.

4. Responsibilities

4.1 Governing Body

It is the responsibility of our Governing Body to ensure that our school complies with its legislative duties and has regard to Government guidance in Keeping Children Safe in Education to ensure that our school's policies, procedures and training are effective and comply with the law.

This responsibility includes understanding the local criteria for action and assessment and supplying information as requested by the three safeguarding partners (Local Authority, Police and Clinical Commissioning Group).

4.2 Our Governing Body will:

- Designate a lead governor for child protection and safeguarding who will oversee the school's policy and practice and champion safeguarding issues.
- Nominate a member of the governing body (usually the Chair) to be responsible in the event of an allegation of abuse made against the Headteacher.
- Ensure that the school has a designated safeguarding lead (DSL) within the senior management team and that s/he has the additional time, funding, training, resources and support needed to carry out their role effectively.
- Ensure that policies and procedures are in place, which are compliant with government guidance and local Safeguarding Partnership Arrangements. These should be reviewed annually and staff should be encouraged to contribute to their development. These should be made available publicly via the website or other means.
- Ensure that all staff, governors and volunteers access appropriate levels of child protection and safeguarding induction and training, including online safety. In addition, all staff should receive regular safeguarding and child protection updates (e.g. via email, e-bulletins, staff meetings) as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- Liaise closely with the designated safeguarding lead and receive regular reports to monitor procedures and practice and ensure compliance.
- Ensure that staff understand the process and principles for sharing information, including the Data Protection Act 2018 and the General Data Protection Regulations (GDPR) 2016.
- Ensure that safe recruitment procedures are in place and are applied for all staff and volunteers to ensure suitability to work with children, including the requirement for at least one person conducting an interview to have completed safer recruitment training. See **Safer Recruitment Policy**.
- Ensure that Allegations Management procedures are in place and embedded across the school.

- Ensure that other related procedures are in place and embedded e.g. the Staff Code of Conduct, Safe Practice, Staff/Pupil Relationships; Acceptable use of Technologies.

- Ensure that appropriate responses to children who go missing from education, particularly repeat occasions are in place to help identify the risk of abuse and neglect, including sexual abuse or exploitation, and to help prevent the risks of their going missing in future.

- Ensure that other related procedures e.g. FGM, Anti-bullying, Responding to Incidents of Sexual Harassment and Violence, Preventing Radicalisation, Trafficking and Modern Day Slavery are in place and embedded (see Appendix 1: Further Information – Safeguarding Children in Specific Circumstances).

- Ensure any deficiencies in safeguarding arrangements are remedied without delay.

- Ensure that staff are equipped to respond to the needs of vulnerable children including those with disabilities and those who are Looked After by the Local Authority.

- Ensure that the curriculum supports children in recognising and responding to risks

- Take a proportionate risk-based approach to the level of information that is provided to temporary staff and volunteers.

4.3 Designated Safeguarding Lead (DSL)

Our DSL is a member of the senior leadership team and takes lead responsibility for safeguarding and child protection. This is explicit in the role-holder's job description (See Appendix 1 for the DfE's role description). The Deputy DSL is trained to the same standard as the DSL.

N.B. Whilst the activities of a DSL can be delegated to the Deputy DSL, the ultimate lead responsibility for safeguarding and child protection remains with the DSL. This responsibility should not be delegated.

During term time our DSL or Deputy DSL will always be available (during school hours) for staff to discuss any safeguarding concerns. We will ensure appropriate cover arrangements for any out of hours/ out of term activities (as per the school's Trips and Offsite Activities procedures).

Our DSL and Deputy DSL will liaise with the three safeguarding partners (Local Authority, Police and Clinical Commissioning Group) and work with other agencies in line with Working Together to Safeguard Children (2018).

4.4 Our DSL will:

- Undergo training to provide them with the knowledge and skills required to carry out the role. Training should be updated every two years with regular updates (at least annually) on developments in between, e.g. via e-bulletins, Forums for DSLs, and reading time, to keep up with any developments relevant to their role.

- Act as focal point for staff concerns and liaise with the Local Authority and other agencies in accordance with Working Together to Safeguard Children.

- Refer all cases of suspected abuse to Harrow Children's Social Care via the Multi-agency Safeguarding Hub (MASH).

- Refer all cases to the police where a crime has been committed.

For the full Role Description for the DSL see **Appendix 1.**

4.5 What all staff should look out for:

Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking, sexual or criminal exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing drugs or alcohol themselves
- has returned home to their family from care
- is a privately fostered child
- is at risk of 'honour-based' abuse such as Female Genital Mutilation or Forced Marriage
- is persistently absent from education, including persistent absences for part of the school day

4.6 Thresholds for Intervention

The DSL will decide upon the most appropriate course of action and whether the concerns should be referred to Children's Social Care – refer to Harrow Thresholds Guidance. If it is decided to make a referral to Children's Social Care the parent will be informed, unless to do so would place the child at further risk or undermine the collection of evidence e.g. obtaining forensic evidence. All concerns, discussion and decisions will be recorded in writing.
N.B. Informing parents does not require seeking their consent to share the information with professionals who need to know.

The DSL will provide guidance on the appropriate action. Options will include:

- Managing any support for the child internally via the school's own pastoral support processes;
- An early help assessment or;
- A referral for statutory services e.g. the child is or might be in need or suffering or likely to suffer harm.

4.7 Early Help – All staff play an important role in safeguarding and promoting the welfare of children and should be prepared to identify children who may benefit from early help. Early help means providing support as soon as a problem emerges at any point in a child's life. This may be done for example, by immediately speaking with the DSL, or their deputies, regarding any concerns or emerging issues, sharing information with other professionals to support early identification and assessment etc. Taking these steps may prevent concerns from escalating.

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner. Any such cases should be kept under constant review and consideration given to a referral to Children's Social Care for assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

4.8 Children in Need – A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. The Local Authority is required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989.

4.9 Children suffering or likely to suffer significant harm - Local authorities, with the help of other organisations as appropriate, have a duty to make enquiries under section 47 of the Children Act 1989 if they have reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm. Such enquiries enable them to decide whether they should take any action to safeguard and promote the child's welfare and must be initiated where there are concerns about maltreatment, including all forms of abuse and neglect, female genital mutilation or other so-called honour based violence, and extra-familial threats like radicalisation and sexual exploitation.

4.10 All students identified as children in need or children at risk will be provided with appropriate levels of pastoral support led by a DSL in conjunction with Heads of Year and form tutors.

5. Procedures

5.1 General

It is the responsibility of every member of staff and volunteer at HIC to know, understand and follow our Child Protection and Safeguarding Policy and Procedure. They should maintain an attitude of '**it could happen here'** where safeguarding is concerned and know what to look for.

If any member of staff or volunteer is concerned about a child s/he must inform the DSL or the Deputy DSL immediately. They must record information regarding the concerns on the same

day. The written record must be a clear, precise, factual account of the observations or what has been said.

Where there is a child protection concern, allegation or disclosure the DSL will make an immediate call to Children's Social Care to alert or to consult with them. The Multi Agency Referral Form will be sent by the DSL or Deputy DSL.

If in exceptional circumstance the DSL (or Deputy) is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Children's Social Care. In these circumstances, any action taken should be shared with the DSL as soon as is practically possible.

If a member of staff disagrees about the level of concern and feels that a child has not been protected, then any member of staff can make a direct referral to Children's Social Care – refer to HSCB Guidance on Multi-Agency Resolution of Professional Disagreements

Within one working day of a referral being made, Children's Social Care should acknowledge receipt to the referrer and make a decision about the next steps and the type of response that is required. The referrer should follow up if this information is not forthcoming.

If social workers decide to carry out a statutory assessment, staff should do everything they can to support that assessment (supported by the DSL as required).

If, after a referral, the child's situation does not appear to be improving, the referrer should consider following the HSCB Guidance on Multi-Agency Resolution of Professional Disagreements to ensure that their concerns are addressed and, most importantly, that the child's situation improves.

5.2 When concerned about a child

All staff and volunteers should be aware that the main categories of abuse include, Physical, Emotional, Sexual Abuse and Neglect (see Appendix 3). Training should equip staff to help identify the indicators of harm, but in general in an abusive relationship a child may:

- Appear frightened of a parent or others in the household e.g. siblings;
- Appear frightened of someone outside of the home, including a peer. This includes within the school setting;
- Act in a way that is inappropriate to her/his age and development (full account needs to be taken of different patterns of development and cultural backgrounds);
- Display insufficient sense of boundaries or lack stranger awareness;
- Appear wary of adults and display a 'frozen watchfulness' or appear noticeably withdrawn.

5.3 Dealing with a disclosure

If a child discloses that he or she has been abused or neglected, the member of staff or volunteer should:

- Listen to what is being said without displaying shock or disbelief, allowing the child to talk freely and at their own pace;
- Take what the child says seriously;
- Listen and only ask questions when it is necessary to obtain clarification;
- Ask only open questions such as How did that happen? What was happening at the time? Anything else you want to tell me?
- Not ask leading questions which may be considered as suggesting what might have happened, or who has perpetrated the abuse, as this can later be interpreted as putting ideas into the child's mind;
- Reassure the child, but do not make promises, particularly about maintain confidentiality – it might be necessary to refer to other agencies. It is better to say that you might have to tell someone who will ensure the correct action is taken;
- Reassure the child that they were right to tell someone;
- Remain objective and not prejudge an alleged perpetrator;
- Make a written record as soon as possible, using the child's language when relaying what they said (do not include the personal opinion of the note taker);
- Pass the information to the DSL without delay.

5.4 Confidentiality and Communicating with Parents

All staff in schools have a responsibility to share relevant information in response to child protection concerns or Children in Need with other specified professionals, particularly investigative agencies i.e. Children's Social Care and the Police.

If a child confides in you and requests that the information is kept secret, it is important to tell the child in a sensitive manner and appropriate to their development that you cannot promise complete confidentiality, but explain what you will do next and that information will only be shared with those who need to know in order to help.

Staff/volunteers who receive sensitive information about children and their families should therefore only share information with appropriate professionals.

Parents should be made aware of the school's Safeguarding and Child Protection Policy and Procedures and that these are available on our school's website.

Parents should be informed prior to referrals being made to other agencies, unless to do so might place the child at further risk or cause evidence to be removed or destroyed. The DSL will ensure that our school's information sharing arrangements comply with government guidance (see Section 6)

Any written communications containing sensitive information must only be sent to other professionals on a need to know basis using secure mail processes e.g. secure email.

5.5 Record Keeping

When a child protection concern has been identified, reported or disclosed, the member of staff receiving this information should:

- Make brief notes as soon as possible.
- Not destroy any original notes – these are sometimes required by a court.
- Record the date, time, place and any noticeable non-verbal behaviour and the words used by the child.
- Draw a diagram to indicate the position of any visible injuries.
- Record statements and observations rather than interpretations or assumptions.
- Make a record of all concerns, discussions and decisions made, and the reasons for those decisions. If in doubt about recording requirements, staff should discuss with the DSL.
- Sign and date your notes.

All notes and records must be given to the DSL promptly.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information - England) Regulation 2005.

5.6 Transfer of files/records

When a child leaves our school, our DSL will ensure that their child protection file, if they have one, is transferred securely to the new school or college as soon as possible and ensure that the relevant member of staff in the new establishment is made aware. For further guidance see Guidance on the transfer of a CP or Safeguarding file to another educational setting.

6. Information Sharing

Information sharing is vital in identifying and tackling all forms of abuse and neglect. The Data Protection Act 2018 and GDPR do not prevent or limit the sharing of information for the purposes of keeping children safe. Fears about sharing information **must not** be allowed to stand in the way of the need to promote the welfare and protect the safety of children.

Further advice can be found on the Information Commissioner's Website and in particular the ICO Guide to Data Protection which includes guidance on the GDPR.

The DfE has also published Information Sharing Advice for Safeguarding Practitioners and Data protection: a toolkit for schools
This document includes the seven golden rules to information sharing:

1. Remember that the General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing but

provide a framework to ensure that personal information about living individuals is shared appropriately.

2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where there is a lawful basis to share information e.g. S47 or S17 enquiries it is good practice to inform parents that the information will be shared.
5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

All staff should be proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to Children's Social Care.

7. Safer Workforce

7.1 Safer Recruitment – HIC has a separate *Safer Recruitment Policy* which specifies how all staff and volunteers must be recruited, following robust recruitment and selection process, including DBS and thorough reference checks.

The aims of the Safer Recruitment Policy are to help appoint the most suitable people to work with our pupils and to deter, reject or identify people who might harm pupils or are otherwise unsuitable to work or volunteer in our school.

7.2 Safer working practice - All school staff and volunteers should take care not to place themselves in a vulnerable position with a child. Staff Code of Conduct and forms part of our

College's compulsory training for all staff and volunteers. For further guidance refer to Safer Recruitment Consortium training information.

7.3 Managing allegations against staff and volunteers - Any allegation against a member of staff or volunteer, as described below, must be reported to the **Headteacher** without delay.

This part of the guidance relates to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Where an allegation is made against the Headteacher, the matter must be reported immediately to the Chair of Governors, without notifying the Headteacher first.

Where a member of staff or volunteer may have:

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

In addition, we ensure that staff and volunteers are aware that sexual relationships with pupils aged under 18 are unlawful and could result in legal proceedings taken against them under the Sexual Offences Act 2003.

Our school will also ensure that any member of staff facing an allegation will be provided with support, including a named contact if they are suspended. We will work effectively with the LADO to help ensure that the matter is dealt with as quickly, fairly and consistently as possible in the interests of all concerned.

The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. Confidentiality should not be promised and information should be shared on a 'need to know' basis only.

An immediate written record of the allegations should be made, including time, date and place where the alleged incident took place, with brief details of what was said to have happened. This record should be signed and immediately passed on to the Headteacher (or Chair of Governors if the allegation is made against the Headteacher).

The Headteacher or Chair of Governors will not investigate the matter but will consult the LADO via MASH.

Whilst recognising our duty to support staff, the welfare of our pupils remains our paramount consideration.

Our school will ensure that any disciplinary proceedings against staff relating to child protection matters are concluded in full even when the member of staff is no longer employed at the school. We recognise our legal duty to refer to the Disclosure Barring Service (DBS) and any other relevant professional body details of anyone who has harmed or poses a risk of harm to a child. For further details on the management of allegations against staff, please see HIC 's Safer Recruitment Policy.

Low level concerns - The school promotes an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately, including low level concerns.

A low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside or work and does not meet the harm threshold or is not otherwise serious enough to consider a referral to the LADO. Examples of such behaviour include but are not limited to: being over friendly with children, having favourites, taking photographs of children on their mobile phone, engaging with a child on a one-to-one basis in a secluded area, or behind a closed door and/or humiliating pupils.

All low-level concerns will be shared with the Headteacher so that they are dealt with effectively and to also protect those who work in or on behalf of the school from becoming the subject of potential false low-level concerns or misunderstandings.

8. Physical Intervention/ Positive Intervention

The school's approach to physical intervention and positive handling by staff complies with the DfE's guidance on use of reasonable force. *S*taff may only use reasonable force, meaning no more force than is needed to prevent pupils from hurting themselves or others, from damaging property, or from causing disorder. It is always unlawful to use force as a punishment.

Headteachers and other authorised trained staff can use such force/restraint as is reasonable in the circumstances to conduct a search for the following prohibited items: knives and weapons, alcohol, illegal drugs, stolen items, cigarettes and tobacco, fireworks, pornographic images, mobile phones or any article that has been or is likely to be used to commit an offence, cause personal injury or damage property.

Where the use of force is necessary, plans and reasonable adjustments should be made for disabled children and children with special educational needs.

Any use of force or restraint must be recorded on the school's Physical Intervention Report Form and the parent/carer should be informed of the incident.

9. Whistleblowing

All staff and volunteers at our school should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime and know that such

concerns will be taken seriously by our senior leadership team, this includes both allegations and low level concerns (Appendix 5).

All staff and volunteers are to be made aware of their Whistleblowing responsibilities promptly report any concerns in the interests of protecting children and staff from poor practice and or unsuitable behaviour. This includes the requirement to self-disclose any personal information which may impact on their suitability to work in an education setting.

Where internal reporting arrangements are viewed not to have been taken seriously or with sufficient rigour, any member of staff can raise concerns externally if the matter is not resolved by the Headteacher or Chair of Governors e.g. via the Local Authority's Designated Officer for Managing Allegations; the HSCB or the Government's Whistle-blowing report line: **0800 028 0285 or** help@nspcc.org.uk

10. Supporting Vulnerable Children

We recognise that without appropriate intervention and support, abuse or witnessing violence may have an adverse impact on children which may last into adulthood.

Our school will support pupils through:

- Curricular opportunities to encourage self-esteem and self-motivation;
- An ethos that actively promotes a positive, supportive and safe environment and values the whole community;
- Liaison with other agencies which support the pupil such as Social Care and Child and Adolescent Mental Health Services (CAMHS);
- Our school's behaviour policy will support vulnerable pupils in the school. Our staff will agree a consistent approach that focuses on the behaviour of the child but does not damage the pupil's sense of worth.

10.1 Looked After Children. The most common reason for children becoming looked after is as a result of abuse and/or neglect. We will ensure that our staff have the skills, knowledge and understanding necessary to keep looked after children safe, including children who were previously looked after.

In particular, we will ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with Parental Responsibility. Our staff will obtain information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. Our **DSL** will obtain details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

The DSL for CLA will work with the virtual school head and the Personal Adviser to promote the educational achievement and welfare of existing and previously Looked After Children.

For further information see The Role and Responsibilities of the Designated Teacher and Promoting the Education of Looked After Children.

10.2 Children potentially at greater risk of harm

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Local authorities should share the fact a child has a social worker, and the DSL will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

11. Online Safety

We ensure that we have effective mechanisms to identify, intervene in, and escalate any online safety incident where appropriate. Online safety is included in our curriculum at all levels and information is also provided to parents/carers. Where students are being asked to learn online at home, the school follows government advice to support schools to so safely.

Staff are made aware of the school approach to online safety, including:

- Creating a safer online environment – including training requirements, filters and monitoring;
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on-line (Teaching online safety in schools July, 2019);
- Inspiring safe and responsible use and behaviour;
- Acceptable and safe use of mobile phones both within school and on school trips/outings;
- Safe use of camera equipment, including camera phones; and
- What steps to take if you have concerns and where to go for further help.

All staff must agree to the Acceptable use of ICT Policy in conjunction with our Code of Conduct in relation to personal online behaviour.

12. Child on Child Abuse

Bullying –

Our school's policy on the prevention and management of bullying is set out in a separate document and is reviewed annually by the governing body. This policy includes reference to all types of bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying). We acknowledge that to allow or condone bullying may lead to considerations under child protection procedures.

We recognise that children can also be vulnerable to: abuse in intimate relationships between peers, physical abuse, sexual violence and harassment, causing someone to engage in sexual activity without consent, consensual and non-consensual sharing of nudes and semi-nude images and/or videos, engaging in sexual activity without consent, upskirting and initiation/hazing type violence and rituals. Such abuse may occur both inside and outside of school and online. Children may also be the perpetrator of such behaviour. The school has a zero-tolerance approach to abuse and will always address incidents of abuse seriously, involving partner agencies where required. Staff also understand that if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not reported.

Staff should not dismiss abusive behaviour as 'normal' between young people. Staff should not develop high thresholds before taking action and abusive behaviour should never be passed off as 'banter', 'just having a laugh', 'part of growing up' or 'boys being boys', as it can lead to a culture of unacceptable behaviours and an unsafe environment for children. Equally, abuse issues can sometimes be gender specific e.g. girls being sexually touched/assaulted and boys being subject to initiation/hazing type violence and rituals. Children with special education needs and disabilities (SEND) are also three times more likely to be abused than their peers.

Child on child sexual violence and sexual harassment –

At HIC, we recognise that sexual violence and sexual harassment can occur between children of **any age and sex.**

Sexual violence refers to sexual offences under the Sexual Offences Act 2003 as described below:
Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

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

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents.

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of activity but not another. Consent can be withdrawn at any time and each time activity occurs. A child under the age of 13 can never give consent to any sexual activity, the age of consent is 16, sexual intercourse without consent is rape.

Sexual harassment means 'unwanted conduct of a sexual nature' that can occur online and offline. In referencing sexual harassment, it is in the context of child on child sexual

harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include: sexual comments, sexual jokes or taunting, physical behaviour, displaying pictures or drawings of a sexual nature, upskirting and online sexual harassment.

Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. The umbrella term is 'harmful sexual behaviour' (HSB) and it can occur online and/or face-to-face. The school will always consider HSB in a child protection context.

In response to such a report our school will act in accordance with Part 5 of KCSIE (2022):

- reassure the victim that they will be taken seriously, and they will be supported;
- not promise confidentiality as it is very likely that the concern will need to be shared further
- respond in line with our safeguarding procedures outlined in section 5 of this document which have been shared with all staff and students;
- where a concern includes an online element, follow DfE guidance: Searching, screening and confiscation at school and UKCCIS advice Sexting in schools and colleges. Adults should not view sexual imagery unless there is good and clear reason to do so. Wherever possible responses to incidents should be based on what DSLs have been told about the content of the imagery. See Guidance on Suspected Indecent Imagery for Staff.
- if possible, manage any such reports with two members of staff present (preferably the DSL being one of them).

Where there has been a report of sexual violence, our DSL will make and record an immediate risk and needs assessment.

Where there has been a report of sexual harassment, the DSL will consider the need for a risk assessment on a case-by-case basis.

The risk and needs assessment will consider and keep under review:

- the victim, especially their protection and support;
- the alleged perpetrator; and
- all the other children (and, if appropriate, adult students and staff) at the school, especially any actions that are appropriate to protect them

Our DSL will engage with children's social care, the police and specialist services as required. Any risk assessments undertaken by the other agencies/services will be used to inform our school/college's own risk assessment.

Important considerations:

- the wishes of the victim in terms of how they want to proceed. Victims should be given as much control as is reasonably possible;

- the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
- the ages and developmental stages of the children involved;
- any power imbalance between the children e.g. age differential, disability or learning difficulty
- if the alleged incident is a one-off or a sustained pattern of abuse;
- that sexual violence and sexual harassment can take place within intimate personal relationships between children
- importance of understanding intra familial harms and any necessary support for siblings following incidents
- any ongoing risks to the victim, other children, adult students or staff; and
- other related, contextual issues e.g. in the community/local environment
- if both the alleged perpetrator and victim are still attending the same school/college, how best to keep them at a reasonable distance apart (including on transport).

Management of sexual violence/harassment cases

Where appropriate, the management of such cases will be agreed in consultation with children's social care and/or the police or other specialist service. There are four possible routes **– all** underpinned by the principle that such behaviour is **never acceptable and will not be tolerated:**

Manage internally - In some case of sexual harassment, e.g. one-off incidents, it might be appropriate to handle the incident internally, perhaps through utilising our behaviour and bullying policies and by providing pastoral support.

Early Help – Providing early help can be particularly useful to address non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referrals to children's social care – Where a child has been harmed, is at risk of harm, or is in immediate danger, we will make a referral to children's social care, who will determine whether any of the children involved are in need of protection or other services. Referring to children's social care should not delay our school from taking immediate action to protect the victim and other children. However, we will ensure that any such actions do not jeopardise a statutory investigation.

Reporting to the Police – Any report to the police will generally be in parallel with a referral to children's social care. Where a report of rape, assault by penetration or sexual assault is made, the matter should be passed on to the police. If the alleged perpetrator is under ten (below the age of criminal responsibility), the principle of reporting to the police remains. The police will take a welfare approach, rather than a criminal justice approach.

The school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator and their parents/carers. They should also discuss the best way to protect the victim and their anonymity.

With all routes outlined above, it is vital that all concerns, decisions and reasons for decisions are recorded (written or electronic).

Bail conditions – The term 'Released Under Investigation' (RUI) will apply where circumstances do not warrant the application of bail to either re-attend on a particular date or to include conditions preventing activity in or in some cases ensuring compliance with an administrative process.

In all cases, our school will work with children's social care and the police to manage any implications and to safeguard children. An important consideration will be to ensure that the victim can continue in their normal routine, including continuing to receive a suitable education.

The end of the criminal process – if a child is convicted or cautioned for a sexual offence and remains in school, expectations regarding their future behaviour and any restrictions must be made clear.

Unsubstantiated, unfounded, false or malicious reports – if a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to local authority children's social care may be appropriate. The school should also consider whether any disciplinary action is appropriate against the individual who made it as per their behaviour policy.

Safeguarding and supporting the victim – Support for the victim will be tailored on a case –by-case basis. victims may not disclose the whole picture immediately. They should be asked if they would find it helpful to have a designated trusted adult to talk to about their needs and have choice about who this is. In response to any stress they may experience, flexible or alternative arrangements for their education may need to be considered. We will do everything we reasonably can to protect the victim from bullying and harassment to ensure that they continue to receive a suitable education.

Safeguarding and supporting the alleged perpetrator – Any child will likely experience stress as a result of being subject of allegations and any associated negative reactions by their peers. We will respond proportionately, recognising that the alleged perpetrator may have unmet needs as well as potentially posing a risk of harm to other children. These behaviours may be a symptom of either their own abuse or exposure to abusive practices and or materials. We will seek advice as appropriate from children's social care, specialist sexual violence services and the police and support will be considered on a case-by-case basis. We will do everything we reasonably can to protect the perpetrator from bullying and harassment to ensure that they continue to receive a suitable education.

If the victim or alleged perpetrator moves to another educational provision, our DSL will ensure that relevant staff at the new provision are made aware of any ongoing support needs and any potential risks to other children and the staff.

13. Further Information – Safeguarding Children in Specific Circumstances

13.1 Child abduction and community safety incidents

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

and acquaintances); and by strangers. There may also be community safety incidents within the vicinity of the school which can raise concerns amongst children and parents.

Opportunities for students to develop their confidence and abilities around keeping themselves are embedded into the school curriculum.

13.2. Children and the court system

Guidance is available for when children are required to give evidence in **criminal courts** 5-11 year olds and 12-17 year olds.

Making arrangements for children via the **family courts** following separation can be stressful and entrench conflict in families. The Ministry of Justice has launched useful online guidance Get help with child arrangements (also known as contact, access or custody).

13.3 Children with Disabilities or Special Educational Needs

Our school is committed to ensure that children with disabilities or special educational needs have exactly the same human rights to be safe from abuse and neglect, to be protected from harm and achieve the same outcomes as non-disabled children. We recognise children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges. This is because they can experience greater vulnerability as a result of negative attitudes and because they may have additional needs relating to physical, sensory, cognitive and/or communication impairments.

This understanding is incorporated into our staff training, so that we all remain vigilant to identifying the additional vulnerabilities for these children in our care and provide the appropriate level and type of pastoral support.

Staff should bear in mind that additional barriers can exist when recognising abuse and neglect in children with special educational needs and/or disabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration; these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children; the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs and communication barriers and difficulties in managing or reporting these challenges.

13.4 Children missing from education

A child going missing from education, particularly repeatedly, is a potential indicator of abuse or neglect and such children are at risk of being victims of harm, exploitation or radicalisation.

The school will fulfil its statutory duty in notifying the local authority when removing a pupil's name from the admission's register outside of the normal transition points. We will make reasonable enquiries to establish the whereabouts of the child jointly with the local authority before deleting their name from the register. We will also notify the local authority within five days of adding a pupil's name at a non-standard transition point.

When one of our pupils goes missing from home or care we will contribute to the police and local authority's efforts to identify and locate the child by completing the Grab Pack for a Missing Children. For further guidance see Children missing education

13.5 Children with a family member in prison

These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO (National Information Centre on Children of Offenders) provides information to support professionals working with offenders and their children, to help mitigate negative consequence for those children.

13.6 Child Sexual Exploitation and Child Criminal Exploitation

Child Sexual Exploitation and Child Criminal Exploitation are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual or criminal activity. In some cases, the abuse will be in exchange for something the victim needs or wants, and/or will be to the financial benefit or increased status of the perpetrator or facilitator.

Child Sexual Exploitation and Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology. Like all forms of abuse exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posting on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of Child Criminal Exploitation:

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

The above Child Criminal Exploitation indicators can also be indicators of Child Sexual Exploitation, as can:

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

Our school will support the multi-agency activity to combat these crimes and help to divert and support any young pupils affected by CSE and CCE. We will follow the HSCB protocol for identifying and managing cases of CSE and/or CCE and promote the use of the HSCB's SAFEGUARD Identification Tool Identification tool in our child protection training. Also see section 'Child on Child Sexual Violence and Sexual Harassment.

13.7 Serious violence

Schools are increasingly recognised as places where early warning signs can be spotted that younger children may be at risk of getting involved in serious violent crime. Crucial preventive work can be done at this stage to prevent negative behaviour from escalating and becoming entrenched. We recognise that even low levels of youth violence can have a disproportionate impact on a pupil or the wider school/community environment. We will therefore, support children in developing safeguarding skills to prevent involvement in risky behaviours, and where serious concerns arise we will work collaboratively with our partner agencies to help prevent escalation of harm.

For further information refer to government guidance advice to schools on gangs and youth violence and Preventing serious violence: a multi-agency approach.

Support for young people affected by gang association can be obtained via London gang exit

13.8 County Lines

This is a geographically widespread form of criminal activity involving drug networks or gangs that groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural or seaside areas. Missing episodes can be an important identifying factor, where the victim may have been trafficked for these purposes. In close working relationship with our local MASH a referral to the National Referral Mechanism will be considered for any such concerns.

Further advice can be obtained from Home Office guidance Criminal exploitation of children and vulnerable adults - county lines

13.9 Cybercrime

Cybercrime is a criminal activity committed using computers and/or the internet. Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cybercrime.

If there are concerns about a student in this area then the DSL will consider referring them to the Cyber Choices programme.

13.10 Domestic Abuse

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children can also be victims, and perpetrators in their own relationships. Extra-familial harms can include sexual harassment and domestic abuse in their own intimate relationships (teenage relationships).

Our school recognises the immediate and long-term impact of domestic abuse on a child's development and emotional wellbeing. All staff will remain vigilant to identifying the signs so that early help and protective action can be instigated where appropriate. We endeavour to provide the child with a safe and caring environment at school to help mitigate the impact of home-life stresses.

Any notifications received from the police/MASH of domestic abuse incidents, will be promptly reviewed by our DSL. This will enable our school to respond appropriately to the impact on the child/young person and to share any additional information with MASH to assist in the overall identification and assessment of risk

13.11 So-called 'honour-based' abuse (HBA)

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

13.12 Female Genital Mutilation (FGM)

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

In our school we recognise that whilst there is not necessarily an intention to harm a girl through FGM, the practice has serious short and long term medical and psychological implications. We are committed to work with families, partner agencies to promote understanding and safeguard pupils who may be at risk of this practice.

We aim to work sensitively with community groups where this may be a cultural belief and practice, however we will act to safeguard and promote our pupils welfare where required and will fulfil our duties under the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015). This places a statutory duty upon teachers to personally report to the police cases where they discover that an act of FGM appears to have been carried out on a girl under 18.

Where it is suspected that a girl is at risk of FGM being undertaken then child protection procedures must be followed.

Further information can be found in:

Multi-agency statutory guidance on female genital mutilation and

Mandatory reporting of female genital mutilation - procedural information

13.13 Forced Marriage

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. A lack of consent can be where a person does not consent or where they cannot consent e.g. if they have learning disabilities. There can also be links to so-called 'honour based' abuse. The Forced Marriage Unit can be contacted for advice or information on 020 7008 0151 or email: fmu@fco.gov.uk. Our school recognises that it has an important role in safeguarding children from forced marriage by educating pupils about the law and their rights and in identifying signs of risk. Further information can be found in Government Guidance on Forced Marriage.

13.14 Homelessness

Our staff will alert the DSL of families becoming or at risk of becoming homeless, so that the DSL can refer to housing services at the earliest opportunity. Indicators for the risk of homelessness can include debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Duties introduced under The Homelessness Reduction Act 2017 shift focus to early intervention. For further information refer to Homeless Reduction Act Factsheets.

13.15 Preventing Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. It can happen in many different ways and settings. The School and its staff have a duty to have due regard to the need to prevent people from being drawn into terrorism (the Prevent duty). Protecting children from radicalisation: the Prevent Duty provides guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

All staff are encouraged to familiarise themselves with the government's website www.educateagainsthate.com. The website is designed to equip school leaders, teachers

and parents with the information, tools and resources they need to recognise and address extremism and radicalisation in young people.

The School has a risk assessment process in place for considering and protecting children at risk of radicalisation and extremism. The risk assessment takes into consideration that the internet and use of social media have become major factors in the radicalisation of young people and our school's E-safety policy and curriculum embeds understanding of these particular risks.

Our school will help to identify young people at risk and work with local partnership arrangements including the **Channel Programme** to help support and divert any young people from associated harm: Click here for further guidance Channel Duty Guidance

13.16 Private Fostering

We recognise the importance of identifying children in Private Fostering arrangements so that their needs can be fully assessed by the local authority. At HIC we will confirm the status of every pupil's care arrangements on admission (or when a pupil's care arrangements change) and notify the local authority of any known or suspected Private Fostering arrangement. We will support any subsequent assessment and remain alert to any additional needs that children placed away from their immediate families might face. See links for information on what constitutes private fostering and details of The Children's Act 1989: private fostering.

13.17 Substance Misuse

We recognise the clear role our school has to play in preventing drug misuse as part of our pastoral responsibilities. We will provide age appropriate information on drugs and alcohol and tackle problem behaviour, working with local partners to prevent drug or alcohol misuse. For further guidance refer to DfE and ACPO Drug Advice for schools. (ACPO has changed to the National Police Chiefs' Council).

Parental Substance Misuse: Substance misuse (drugs or alcohol) may impact on parental capacity and can significantly exacerbate other concerns such as domestic violence or mental health issues. We will remain vigilant in identifying and supporting pupils and their families facing such issues, and work in collaboration with other agencies where necessary to prevent significant harm.

13.18 Mental Health

Our school seeks to promote positive mental health in our pupils and to identify and address those with less severe problems at an early stage and build their resilience. We are also committed to identifying and supporting pupils with more severe needs and to help make appropriate referrals to specialist agencies such as Child and Adolescent Mental Health Services (CAMHS) where necessary.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe pupils day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

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

If staff have a mental health concern about a child that is also a safeguarding concern, they must immediately speak to the DSL or a deputy DSL.

Parental Mental Health: We recognise that some parents with mental health issues may experience difficulties at times with their parenting responsibilities. We are committed to supporting such families and will endeavour to identify those who would benefit from early help from local services and work with them to avoid any adverse impact on their children. For further guidance refer to Parental mental health.

13.19 Trafficking and Modern Day Slavery

Our school will remain alert for children trafficked into the country who may be registered at our school for a term or longer, before being moved to another part of the UK or abroad. We will bear in mind that not all children who go missing from education have been victims of trafficking. For example, there may be instances of children from communities that move around – Gypsy, Roma, Traveller or migrant families – who collectively go missing from school. For further government guidance refer to Safeguarding Children who may have been trafficked practice guidance.

13.20 Young carers

With so many adult responsibilities, young carers often miss out on opportunities that other children and young people have to play and learn. We in **HIC** are uniquely placed to identify and respond to concerns and 'triggers' where children and young people may require additional help as carers. We will aim to respond early with our own pastoral support and where appropriate seeking help from local authority support services for young carers.

Appendix 1 – Role Description for Designated Safeguarding Lead

Governing bodies, proprietors and management committees should appoint an appropriate **senior member** of staff, from the school or college **leadership team**, to the role of designated safeguarding lead.

This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions, inter-agency meetings, contribute to the assessments of children – and/or to support other staff to do so.

Any deputy should be trained to the same standard as the DSL, but the ultimate lead responsibility for child protection remains with the DSL.

Managing referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;
- refer cases where a person is dismissed or has left due to risk/harm to a child to the Disclosure and Barring Service as required;
- refer cases where a crime may have been committed to the Police as required.

Working with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners (Local Authority, Police and Clinical Commissioning Group (CCG);
- liaise with the headteacher or principal to inform him or her of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs or the named person with oversight for SEN in a college) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies.
- act as a source of support, advice and expertise for staff.

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training.

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

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements;
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;
- ensure each member of staff has access to and understands the school or college's safeguarding and child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation (GDPR);
- understand the importance of information sharing, both within the school and with the three safeguarding partners, other agencies, organisations and practitioner's;
- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the *Prevent* duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up-to-date capability required to keep children safe whilst they are online at school or college;
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

Raising Awareness

The designated safeguarding lead should:

- ensure the school or college's child protection policies are known, understood and used appropriately;
- ensure the school or college's safeguarding policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the safeguarding and child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and

- link with the safeguarding partner arrangements to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Transfer of child protection files

Where children leave the school or college (including for in-year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be 101 obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives

Guidance on the transfer of a child protection file to another educational setting.

Availability

During term time the DSL or deputy should always be available (during school hours) for staff to discuss any safeguarding concerns either directly or by phone or email. In exceptional circumstances where they are unavailable, a Level 3 Safeguarding trained senior leader will be available.

Appendix 2: Types of abuse and neglect

All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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

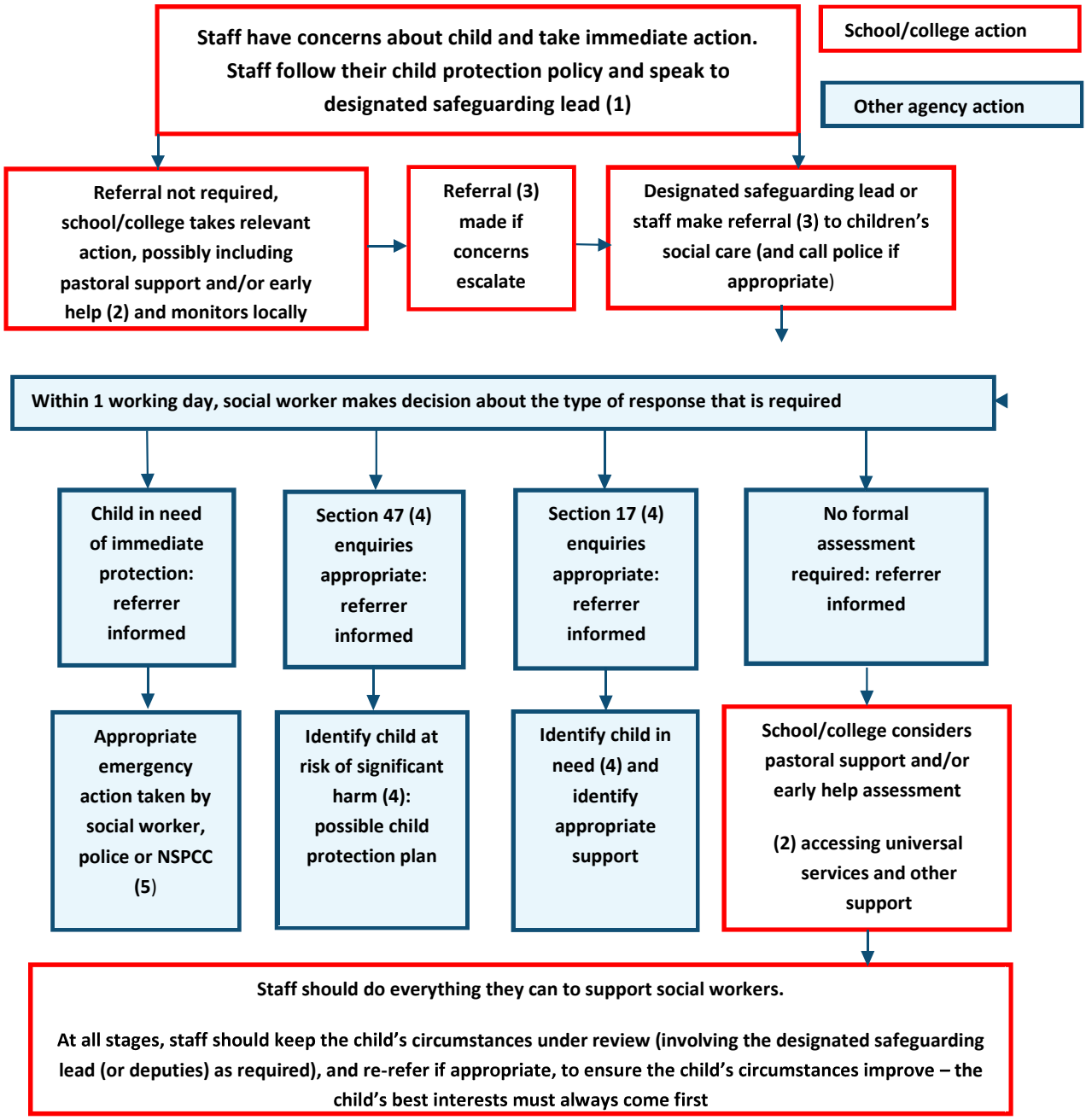
Physical abuse: a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a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

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

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 29).

Neglect: the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix 3 Actions where there are concerns about a child



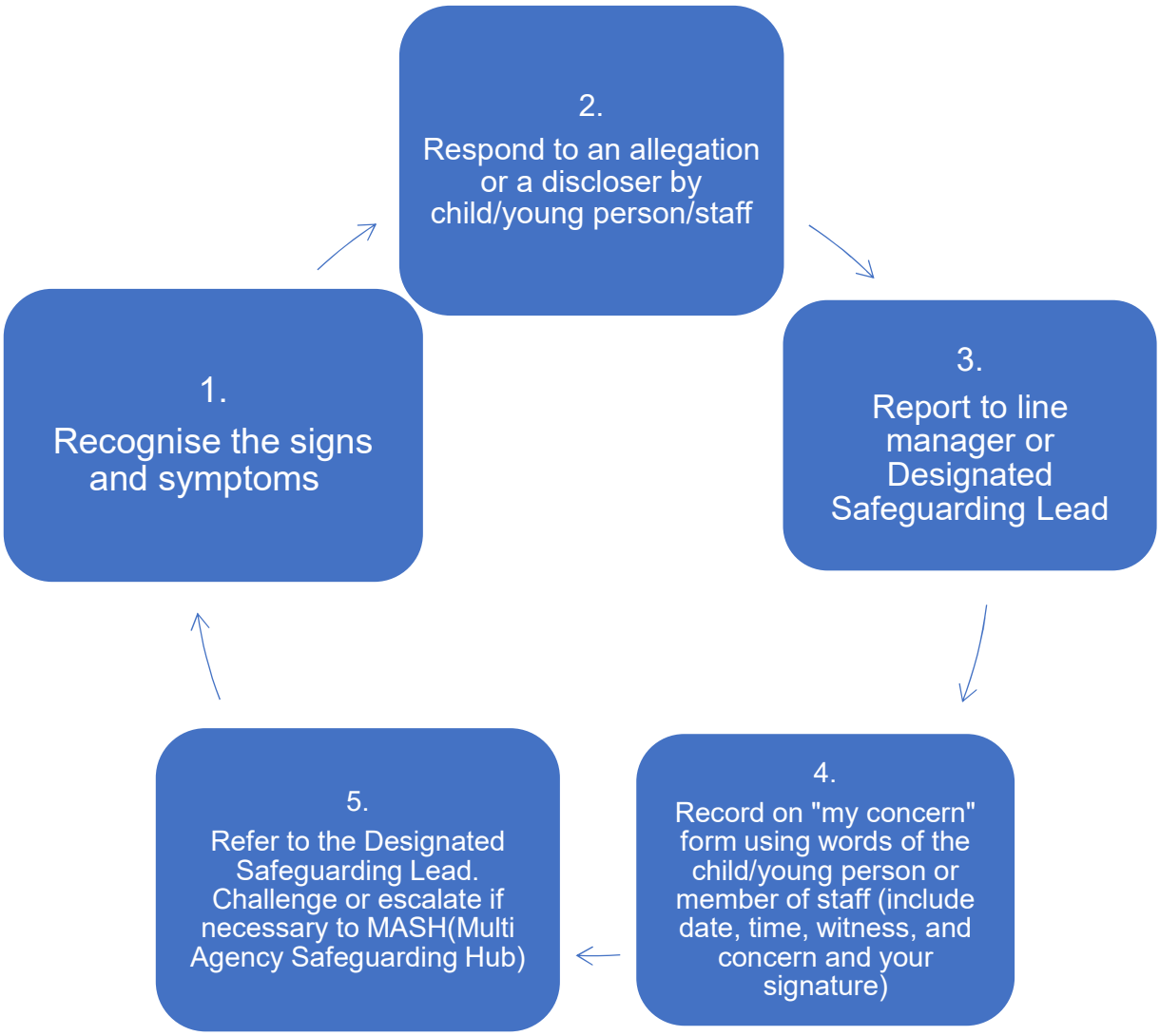
Appendix 4 MY CONCERN (Record of Concern Form) to be filled by the member of staff whom the concern is been reported to by the child/young person/Staff

<table>
<tr><td colspan="4">Child's/Staff's Name(cross out appropriately):</td></tr>
<tr><td colspan="4">DOB:</td></tr>
<tr><td>Gender :</td><td>Ethnic Origin:</td><td>Disability Y/N:</td><td>Religion:</td></tr>
<tr><td></td><td></td><td></td><td></td></tr>
<tr><td colspan="4">Date and time of concern:</td></tr>
<tr><td colspan="4">Your account of the concern:
(what was said, observed, reported and by whom)</td></tr>
<tr><td colspan="4">Additional Information:
(your opinion, context of concern/disclosure)</td></tr>
<tr><td colspan="4">Your response:
(what did you do/say following the concern)</td></tr>
<tr><td colspan="2">Your name:</td><td colspan="2">Your signature:</td></tr>
<tr><td colspan="2">Your position in school:</td><td colspan="2">Date and time of this recording:</td></tr>
<tr><td colspan="4">Action and response of DSL/DDSL/other person responsible for safeguarding:</td></tr>
<tr><td colspan="2">Feedback given to member of staff reporting concern:</td><td colspan="2">Information shared with any other staff? If so, what information was shared and what was the rationale for this?</td></tr>
<tr><td colspan="4">Name:…… Date:…….</td></tr>
</table>

Checklist for DSL (to be printed on back of record of concern form)

✓	Child clearly identified
✓	Name, designation and signature of the person completing the record populated?
✓	Date and time of any incidents or when a concern was observed?
✓	Date and time of written record?
✓	Distinguish between fact, opinion and hearsay
✓	Concern described in sufficient detail, i.e. no further clarification necessary?
✓	Child's own words used? (Swear words, insults, or intimate vocabulary should be written down verbatim.)
✓	Record free of jargon?
✓	Written in a professional manner without stereotyping or discrimination?
✓	The record includes an attached completed body map (if relevant) to show any visible injuries

5 R's of Safeguarding – to be completed on a priority



Appendix 5 Low-level concerns

The School strives to embed a culture of openness and transparency in which the School's values and expected behaviour, as set out in the Code of Conduct for Staff, are constantly reinforced by all staff.

All staff should feel enabled to share any concerns about their own or another member of staff's behaviour, with the appropriate member of staff as set out below.

The distinction between an allegation and a low-level concern

The term 'allegation' (in this context) means that it is alleged that an adult who works with children has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviour that may have happened outside of School that might make an individual unsuitable to work with children)

A low-level concern is any concern about an adult's behaviour towards a child that does not meet the allegation threshold set out above, or is not otherwise serious enough to consider a referral to the LADO.

A low-level concern is any concern, no matter how small, and even if no more than a 'nagging doubt' that an adult may have acted in a manner which:

- is not consistent with the Code of Conduct for Staff, and/or
- relates to their conduct outside of work which, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Examples of such behaviour could include, but are not limited to, being over friendly with children, having favourites, taking photographs of children on their personal devices, engaging with a child on a one-to-one basis in a secluded area or behind a closed door, using inappropriate sexualised, intimidating or offensive language etc.

Staff are not expected to determine whether their concern is a low-level concern, serious enough to consider a referral to the LADO, or meets the threshold of an allegation. Once staff share what they believe to be a low-level concern, that determination will be made by the Headteacher.

How to share low-level concerns

It is important that low-level concerns are shared with the Headteacher as soon as reasonably possible and, in any event, within 24 hours of becoming aware of the concern and relevant incident(s).

Concerns can be shared verbally in the first instance, or in writing. The context in which the low-level concern arose and details which are chronological, precise and accurate as possible of the concern and relevant incident(s) must be provided.

Where details of the low-level concern is provided verbally, the Headteacher will make an appropriate record of the conversation, either contemporaneously or immediately following the discussion. The Headteacher will check the accuracy of the record with the member of staff who raised the concern.

Low-level concerns will be treated in confidence as far as possible, but the School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

Self-reporting

Staff who find themself in a situation which could be misinterpreted, might appear compromising to others, have behaved in a manner which on reflection they consider falls below the standard set out in the Code of Conduct for Staff are encouraged to self-report. Self-reporting can be positive for a number of reasons: it is self-protective in that it enables a potentially difficult issue to be addressed at the earliest opportunity; it demonstrates awareness of the expected behavioural standards and self-awareness of the individual's own actions or how they could be perceived; and is an important means of maintaining a culture where all staff aspire to the highest standards of conduct and behaviour.

Recording and reviewing low-level concerns

All low-level concerns will be recorded in writing by the Headteacher. The record will include details of the context in which the concern arose and the action taken. The name of the member of staff sharing the concern will be noted however, where the member of staff wishes to remain anonymous this will be respected as far as possible.

Records will be reviewed at regular intervals to identify potential patterns of concerning, problematic or inappropriate behaviour.

Retention of records

Records will be kept confidential, held securely and in compliance with the Data Protection Act 2018 and UK GDPR.

When the member of staff leaves and/or takes up new employment the records will be reviewed to ensure it still has value either as a safeguarding measure or because of its possible relevance to future claims and is therefore necessary to retain, or whether it can be securely destroyed.

References

Low-level concerns will not be included in references unless they relate to issues which would normally be included in a reference, e.g., misconduct or poor performance. Low-level concerns which relate exclusively to safeguarding (and not to misconduct or poor performance) will not be referred to in a reference. Where a low-level concern has met the threshold for referral to the LADO and found to be substantiated will be included in a reference.

(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).