CHILD PROTECTION AND SAFEGUARDING POLICY

Child protection and safeguarding policy Summary

At Wey Education, safeguarding is everyone's responsibility.

Safeguarding and promoting the welfare of children means:

- > 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
- > Taking action to enable all children to have the best outcomes

At Wey Education, we will identify, address and monitor safeguarding issues that involve incidents or issues emanating from 'beyond the school day' as well as during school session-time, where we have reason to believe that these impact on the health, safety and well-being of any InterHigh / Academy 21 student, that of their peers and our wider community.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

This policy, alongside the closely related training for staff, details the key facets of knowledge and understanding required in relation to:

- Our key aims and the related legislation, our equality statement as well as key definitions
- Roles, responsibilities and addressing the issue of confidentiality
- How to recognise abuse and to take action, including the range of reporting routes available
- Support for looked after children and those with special educational needs and disabilities
- Issues such as links with parents, and the use of mobile phones and cameras
- Our arrangements for record keeping, staff training and monitoring of safeguarding issues

This policy links closely to other key policies, including our **Online Safety** and **Behaviour and Attendance policy**, including Anti-Bullying. In the appendices of this policy, we outline in detail the types of abuse and how we identify and respond to cases. Specific safeguarding issues are summarised in detail in Appendix 3, as are our arrangements for responding to allegations of abuse made against staff. The appendices also define how we make links with and utilise escalation procedures, including our links with local children's safeguarding boards in local authorities across the UK. We also define here how we ensure that, where we admit international students and safeguarding issues arise, there is equal rigour in our referral processes.

To be read in conjunction with Wey Education policies:

- Safer Recruitment
- E-Safety
- Staff Conduct
- Whistleblowing
- Complaints
- Data Protection

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Wey Designated safeguarding lead (DSL)	Thomas Millington	thomas.millington@interhigh.co.uk
Designated Safeguarding Lead (DSL) – Academy 21	Clare Brokenshire	clare.brokenshire@academy21.co.uk
Deputy DSL	Paul Daniell Tom Evans	Paul.daniell@interhigh.co.uk Tom.evans@interhigh.co.uk
LA Designated Lead Officer for Safeguarding in Education	Michael Gedrim	01597 826431 / 07990 793 843
Independent Chair of Academic Council	Dame Erica Pienaar	
Channel helpline		020 7340 7264

1. Aims

The school aims to ensure that:

- > Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- > All staff are aware of their statutory responsibilities with respect to safeguarding
- > Staff are properly training in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2020) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- > Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- > The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- > Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- > The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

- > Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- > <u>Statutory guidance on FGM</u>, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- ➤ <u>The Rehabilitation of Offenders Act 1974</u>, which outlines when people with criminal convictions can work with children
- > Schedule 4 of the <u>Safeguarding Vulnerable Groups Act 2006</u>, which defines what 'regulated activity' is in relation to children
- ➤ <u>Statutory guidance on the Prevent duty</u>, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Wey Head Office is situated in Crickhowell POWYS and follows the procedures of All Wales Child Protection Procedures and relevant adult protection procedures and other guidance and protocols that have been endorsed and agreed by the South East Wales Safeguarding Children Board (SEWSCB) and the Gwent Wide Adult Safeguarding Board (GWASB) for students accessing provision at the Exam Office or attending the Head Office. All other cases are referred to the Local Children's Safeguarding Board of the student's home area. This means we follow the different procedures and systems outlined for the students' home area. The addendum references specific authorities contact details for schools'/ LA's contracted with A21.

3. Definitions

Safeguarding and promoting the welfare of children means:

- > 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
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Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- > The local authority (LA)
- > A clinical commissioning group for an area within the LA
- > The chief officer of police for a police area in the LA area

4. Equality statement

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- > Have special educational needs (SEN) or disabilities (see section 9)
- > Are young carers
- > May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- > Have English as an additional language
- ➤ Are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- > Are asylum seekers
- > Are at risk due to either their own or a family member's mental health needs
- > Are looked after or previously looked after (see section 11)

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and board members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, <u>Keeping Children Safe in Education</u>, and review this guidance at least annually.

All staff will be aware of:

- > Our systems which support safeguarding, including this child protection and safeguarding policy, the Behaviour Policy, E-Safety policy and staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and Deputy DSLs the behaviour policy, and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

- > The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- > What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- > The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our Wey Lead DSL is Thomas Millington. The DSL takes lead responsibility for child protection and wider safeguarding. Clare Brokenshire acts as the DSL for Academy 21. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the Lead DSL / DSL for Academy 21 are absent, the Deputy DSLs, Paul Daniell and Tom Evans — will act as cover. If the DSL and deputies are not available, Executive Education Director Dr. Sara de Freitas will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL will be given the time, funding, training, resources and support to:

- > Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- > Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the Assistant Dean informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

5.3 The Academic Council and Company Board

The Company Board will approve this policy at each review, ensure it complies with the law and hold the Director of education to account for its implementation.

Dame Erica Pienaar, the Chancellor Emeritus at Wey Education, has been appointed by the Company Board as Senior Board Level Lead for Safeguarding' to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The Senior Board Level Lead for Safeguarding will update the Company Board termly in the form of a written report. The Senior Board Level Lead will be undertake safeguarding training as arranged by the Designated Safeguarding Lead.

The Chief Executive Officer (CEO), (unless the CEO contracts an independent professional officer to act on her behalf) will act as the 'case manager' in the event that an allegation of abuse is made against the Director of Education, Dean or Associate Deans, where appropriate (see appendix 3).

All Academic Council members will read Keeping Children Safe in Education. The board level lead will also undertake safeguarding training/ qualifications.

Section 15 of this policy has information on how Council members are supported to fulfil their role.

5.4 The Associate Dean

The Associate Dean is responsible for the implementation of this policy, including:

- > Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- > Communicating this policy to parents when their child joins the school and via the school website
- > Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- > Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- ➤ Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

Our Data Protection Policy makes clear the exceptions involved in the handling of personal and confidential data when there are safeguarding issues. The policy states that:

We will also share personal data with law enforcement and government bodies where we are legally required to do so, including for: • where the disclosure is required to satisfy our safeguarding obligations We may also share personal data with emergency services and local authorities to help them to respond to an emergency situation that affects any of our pupils or staff.

We note that:

- > Timely information sharing is essential to effective safeguarding
- > 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
- > The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- > If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- > Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

- > The government's <u>information sharing advice for safeguarding practitioners</u> includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- ➤ If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- > Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

7. Recognising abuse and taking action

Staff, volunteers and Academic Council members must follow the procedures set out below in the event of a safeguarding issue.

Please note – in this and subsequent sections, you should take any references to the DSL to mean 'the DSL (or deputy DSL)'.

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

https://www.gov.uk/report-child-abuse-to-local-council

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- > Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- > Stay calm and do not show that you are shocked or upset
- > Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- > Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- > Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- > Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

7.3 If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our local safeguarding procedures.

Any information or concern that a child is at immediate risk of, or has undergone, FGM should result in an immediate child protection referral. If you have concerns that a girl or young woman may be taken overseas for FGM then you should also contact the Foreign and Commonwealth Office. FORWARD is a UK organisation which provides support, counselling and safe space for girls and women to talk about their experiences. They can also educate and work with families to prevent FGM happening to any other girls in the family. The NSPCC has a 24-hour helpline for anyone who is worried a child is at risk of, or has had FGM. You can call 0800 028 3550 or you can email fgmhelp@nspcc.org.uk

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Use the Child Protection Call Tree (Appendix 5) and speak to the relevant member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Early help

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.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

In the case of Academy 21, **mentors** will be immediately contacted by the A21 DSL and will take over responsibility for contacting the relevant authorities in the case of safeguarding incidents involving Academy 21 pupils who are dual-roll. We typically communicate with the safeguarding leads of each school/ Local Authority as they have the prime responsibility for the physical welfare of their students. In the absence of response from the host schools/ LA Safeguarding Officer the A21 DSL will make a referral. If the Lead DSL / DSL for Academy 21 are absent, then Deputy DSLs would step in to oversee referrals and contact with the relevant mentors.

When making these referrals for either Interhigh or Academy 21, the DSL / Deputy DSL will make contact with the relevant LCSB – the Addendum at the end of the policy appendices gives details of those LCSBs with which Academy 21 has direct association.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Academic Council members can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- > Think someone is in immediate danger
- > Think someone may be planning to travel to join an extremist group
- > See or hear something that may be terrorist-related

7.6 If you have a mental health concern

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

At Wey, we will work in a supporting role to promote the mental health of all students and staff. To do this we will:

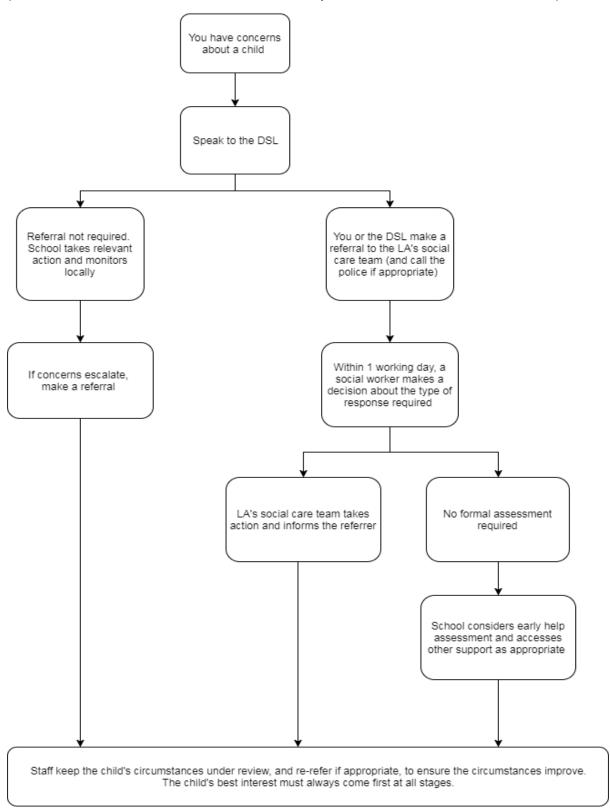
- Create a safe, calm environment which nurtures all students
- Teach students about mental health through the curriculum and offer support and guidance
- Identify students who may be at risk of mental health problems through the use of Health and Wellbeing surveys, changes in behavioral data and pastoral system
- Offer support to all students through 1:1 sessions, escalated support through Health and Wellbeing coordinators and self-enrolled support courses.
- Proactively work with parents and families to support students and help to identify any issues.
- Promote resilience as a skill amongst our student cohort

Any concerns which are raised about a student's mental health will be investigated and appropriate support offered. If a concern cannot be resolved initially, there is a clear path for escalation through class teachers, form tutors, Health and Well-being coordinators, the Head Office pastoral team and the Head of Personalised Learning.

We work with parents and families to support students' mental health and wellbeing. It has been proved that an approach that encompasses home life, as well as school life, has a much greater likelihood of success. Support provided to families includes having clear contact points for parents who are concerned, making information about progress available to parents and providing guidance including signposting useful external advice such as mindforfamilies.org.uk. There may be circumstances where we expect parents and families to seek support externally including from GPs, CYPMHS and other sources.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the Associate Dean. If the concerns/allegations are about the Associate Dean, speak to the Education Director. The Associate Dean /Education Director will then follow the procedures set out in appendix 3, if appropriate.

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

- > Is serious, and potentially a criminal offence
- > Could put pupils in the school at risk
- > Is violent
- Involves pupils being forced to use drugs or alcohol
- > Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

If a pupil makes an allegation of abuse against another pupil:

- > You must record the allegation and tell the DSL, but do not investigate it
- > The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- > The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- > The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate We will minimise the risk of peer-on-peer abuse by:
 - > Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
 - Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
 - > Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
 - > Ensuring pupils know they can talk to staff confidentially by talking with the relevant Health and Wellbeing Coordinator or Head of Faculty.

> Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

7.9 Sexting

This is approach is based on guidance from the UK Council for Child Internet Safety for <u>all staff</u> and for DSLs and senior leaders. For reference, please see our E-Safety policy.

Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must not:

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

You should explain that you need to report the incident and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

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

> The incident involves an adult

- > There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- > What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- > The imagery involves sexual acts and any pupil in the imagery is under 13
- > The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the Associate Dean and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Designated Safeguarding Officer or dialling 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- > What it is
- > How it is most likely to be encountered
- > The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- > Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- > The receipt of such images

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8. Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents about any such concerns following consultation with the DSL.

If we believe that notifying the parents would increase the risk to the child, we will discuss this with the local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify the parents of all the children involved.

9. Pupils with additional / special educational needs and disabilities

We recognise that pupils with additional / special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- > Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- > Pupils being more prone to peer group isolation than other pupils
- > The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- > Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

10. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

> Responding to unauthorised absence or missing education where there are known safeguarding risks

> The provision of pastoral and/or academic support

11. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- > The DSL has details of children's social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, Thomas Millington, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

- > Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- > Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

12. Mobile phones and cameras

Staff have their own personal mobile phones, but will limit such use to non-contact time when pupils are not present in online lessons or physically in the case of extra-curricular activities on site. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. Please see our E-Safety policy for further details on our policy about use of digital imagery / videos.

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

13.2 Other complaints

Please see our Complaints policy for the staged approach we take to handling concerns and complaints.

13.3 Whistle-blowing

Please see our Whistleblowing policy.

This explains:

What areas of malpractice or wrongdoing are covered by the procedures

- > The options available for reporting a concern, including who to approach within the school and externally
- > How Wey Education will respond to such concerns
- > What protection is available to staff who report another member of staff

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Our safeguarding records

- > are stored electronically
- are held on our server in a secure facility confidentially to which designated officers only have access
- > are kept as long as the case in question is open and then stored securely for an appropriate period afterwards

We share information with other agencies when this is appropriate, in line with your local safeguarding procedures.

In addition:

- > Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

15. Training

15.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

15.2 The DSL and deputies

The DSL and deputies will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

15.3 Academic Council members

All Academic Council members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

15.4 Recruitment - interview panels

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

16. Monitoring arrangements

This policy will be reviewed **annually** by the Senior Education Team, led by the DSL. At every review, it will be approved by the Academic Council and Company Board.

17. Links with other policies

This policy links to the following policies and procedures:

- > Behaviour (including Anti-Bullying)
- > E-Safety
- > Staff Code of Conduct
- **>** Complaints
- > Health and safety
- **>** Attendance
- **>** Equality
- > Personal, Social, Health Education
- > First aid
- **>** Curriculum
- > Designated teacher for looked-after and previously looked-after children
- **>** Whistleblowing

APPENDICES

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- > Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- > Seeing or hearing the ill-treatment of another
- > Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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 nonpenetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

Once a child is born, neglect may involve a parent or carer failing to:

- > Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- > Protect a child from physical and emotional harm or danger
- > Ensure adequate supervision (including the use of inadequate care-givers)
- > Ensure access to appropriate medical care or treatment

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

Appendix 2: allegations of abuse made against staff

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

- > Behaved in a way that has harmed a child, or may have harmed a child, or
- 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, or
- > Behaved or may have behaved in a way that indicates they may not be suitable to work with children

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

We will deal with any allegation of abuse against a member of staff or volunteer very quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

Our procedures for dealing with allegations will be applied with common sense and judgement.

Suspension of the accused until the case is resolved

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

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

- > Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- > Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- > Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted

Definitions for outcomes of allegation investigations

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

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

Procedure for dealing with allegations

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

- > Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- > Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- > If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- > If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- > If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- > Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- > Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- > Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- > Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the Associate Dean, or other appropriate person in the case of an allegation against the Associate Dean, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

Confidentiality

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the local authority's designated officer for the authority in which the student lives and for the authority in which the staff member lives, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential employee file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

The records of any allegation that is found to be malicious will be deleted from the individual's employee file.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

Learning lessons

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

This will include consideration of (as applicable):

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

Existing staff and concerns about their suitability once in post

Wey Education checks each staff member's DBS status annually using the Update Service. If we have specific concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- > We believe the individual has engaged in relevant conduct; or
- ➤ The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the <u>Safeguarding</u> <u>Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009</u>; or
- > The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- > The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Appendix 3: specific safeguarding issues

Admissions

It is Wey Education policy to contact the relevant local authority for the area where a student who is enrolling to Interhigh lives. This is so that we can run the necessary checks to establish whether or not the child concerned is on its 'at-risk' register for any reason and if so, to take the necessary steps to establish more about the relevant case. This is so that, as well as gathering information from the family making the application, we have the fullest picture of the student's needs upon admission.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- > Are at risk of harm or neglect
- > Are at risk of forced marriage or FGM
- > Come from Gypsy, Roma, or Traveller families
- > Come from the families of service personnel
- > Go missing or run away from home or care
- > Are supervised by the youth justice system
- Cease to attend a school and not home schooled
- > Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named or another arrangement for continuing education specified (such as home schooling for example). We will adhere to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. This will be outlined to parents on sign up and checked with parents before any submission to an LA. This is not a move against the choice of home schooling but to ensure we work with all partners for the safety of children.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- > Appearing with unexplained gifts or new possessions
- > Associating with other young people involved in exploitation
- > Suffering from changes in emotional wellbeing
- > Misusing drugs and alcohol
- > Going missing for periods of time or regularly coming home late
- > Regularly missing school or education
- > Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

> Having an older boyfriend or girlfriend

Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. In some areas, this is the procedure where police forces are part of Operation Encompass – if the local force is not, it is necessary to check and follow the local procedures.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- > A family/pupil already being known to social services in relation to other safeguarding issues

> A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable
- Finding it hard to sit still for long periods of time (where this was not a problem previously)
- Spending longer than normal in the bathroom or toilet due to difficulties urinating
- Having frequent urinary, menstrual or stomach problems
- Avoiding physical exercise or missing PE
- Being repeatedly absent from school, or absent for a prolonged period
- Demonstrating increased emotional and psychological needs for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations
- Asking for help, but not being explicit about the problem
- Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- > The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- > FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

A girl:

- Having a mother, older sibling or cousin who has undergone FGM
- Having limited level of integration within UK society
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- Talking about a long holiday to her country of origin or another country where the
 practice is prevalent, or parents stating that they or a relative will take the girl out of
 the country for a prolonged period
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM

- Talking about FGM in conversation for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- Being unexpectedly absent from school
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them. If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- > Speak to the pupil about the concerns in a secure and private place
- ➤ Activate the local safeguarding procedures and refer the case to the local authority's designated officer
- > Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk
- > Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- > Terrorism is an action that:
 - Endangers or causes serious violence to a person/people;
 - Causes serious damage to property; or
 - Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

Risk assessment

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

The government website <u>Educate Against Hate</u> and charity <u>NSPCC</u> say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves
- > Becoming susceptible to conspiracy theories and feelings of persecution
- Changes in friendship groups and appearance
- > Rejecting activities they used to enjoy
- > Converting to a new religion
- > Isolating themselves from family and friends
- > Talking as if from a scripted speech
- > An unwillingness or inability to discuss their views
- ➤ A sudden disrespectful attitude towards others
- > Increased levels of anger
- Increased secretiveness, especially around internet use
- > Expressions of sympathy for extremist ideologies and groups, or justification of their actions
- > Accessing extremist material online, including on Facebook or Twitter
- > Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include <u>Channel</u>, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Academic Council members can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:

- > Think someone is in immediate danger
- > Think someone may be planning to travel to join an extremist group
- > See or hear something that may be terrorist-related

Building children's resilience to radicalisation

We will build pupils' resilience to radicalisation by providing a safe environment for debating controversial issues and helping them to understand how they can influence and participate in decision-making. We promote the spiritual, moral, social and cultural development of pupils and, within this, fundamental British values. Personal, Social and Health Education (PSHE) can be an effective way of providing pupils with time to explore sensitive or controversial issues and equipping them with the knowledge and skills to understand and manage difficult situations. The subject can be used to teach pupils to recognise and manage risk, make safer choices, and recognise when pressure from others threatens their personal safety and wellbeing. They can also develop effective ways of resisting pressures, including knowing when, where and how to get help. We encourage pupils to develop positive character traits through PSHE, such as resilience, determination, selfesteem, and confidence. Citizenship helps to provide pupils with the knowledge, skills and understanding to prepare them to play a full and active part in society. It should equip pupils to explore political and social issues critically, to weigh evidence, to debate, and to make reasoned arguments. In Citizenship, pupils learn about democracy, government and how laws are made and upheld. Pupils are also taught about the diverse national, regional, religious and ethnic identities in the United Kingdom and the need for mutual respect and understanding.

Checking the identity and suitability of visitors to Head Office

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- > Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- > The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Appendix 4 – Escalation procedure and details of Local Safeguarding Children's Boards and National Body contacts

Escalation Procedure

Wey staff (DSL) will work directly with families to share information appropriately and work to plans agreed in all relevant forums. Good practice includes the expectation that constructive challenge amongst colleagues within agencies and between agencies provides a healthy approach to the work.

Where members of staff from Wey feel concerns regarding a child are not being addressed it is expected that the appropriate escalation process should be used until a satisfactory conclusion is reached.

The process of resolution will be kept as simple as possible and the aim should be to resolve difficulties at a professional practitioner level wherever possible. It is recognised that differences in status and experience may affect the confidence of some workers to pursue this course of action, and support should be sought from the Wey group DSL.

Child Protection call tree

The InterHigh child protection call tree:

- 1. Thomas Millington (Head of Personalised Learning- Pastoral) Designated Safeguarding Lead for Wey Education
- 2. Paul Daniell (Associate Dean) Deputy DSL and Safer Recruitment Trained.
- 3. Thomas Evans (Associate Dean)
- 4. Jacqueline Daniell (CEO and former DSL)

Contact to be made with the individuals listed above in the strict order of the tree.

The Academy 21 child protection call tree:

- 1. Clare Brokenshire (Head of Faculty and Designated Safeguarding Lead trained)
- 2. Nick Parry (Head of Science)
- 3. Fiona Wilson (Head of Maths)
- 4. Mel Jones (Head of Humanities and ICT)
- 5. Laura Huggins (Head of English)
- 6. Ciara Kelly (PSHE teacher)

Local Safeguarding Children's Boards and National Body contacts

Powys

The Council's Designated Lead Officer for Safeguarding in Education is: Michael Gedrim who can be contacted at: Telephone – 01597 826431 / 07990 793 843 E-mail – michael.gedrim@powys.gov.uk Children's Services can be contacted via Powys People Direct: Telephone – 01597 827666 Out of hours – 0845 054 4847

http://www.cypp.powys.gov.uk/index.php?id=6075

children.youngpeople@powys.gov.uk

Contact the Designated Lead Officer for Safeguarding in Education or Powys People Direct for guidance and advice (01597 827 666). If there is an allegation against a Local Authority Officer then this must be communicated to the Director of Education (Caroline Turner Tel: 01597 826464) or Head of Education (Alec Clark Tel: 01597 826472) or Safeguarding Lead for Children (Audrey Somerton-Edwards) Tel: 01597 826687) who is the Lead Officer for the Authority. If the concern is about the Lead Officer for the Authority then the Head of Education should be contacted. If there is a concern about the Head of Education, then this should be referred to the Director of Education.

Mid and West Wales Safeguarding Board documents can be found on their website: https://www.cysur.wales/

Monmouth

The Monmouthshire Lead Officer for Safeguarding in Education is:- Heather Heaney who can be contacted by:- Phone- 01633 644392 Mobile- 07917707343 Email-heatherheaney@monmouthshire.gov.uk

Monmouthshire Children's Services can be contacted as follows:- Phone: 01291 635669 Out of hours telephone number: 0800 328 4432

Monmouthshire Adult Services can be contacted as follows:- In an emergency, please call 999 to report a vulnerable adult at risk: \neg Monday – Friday 9am to 5pm we operate a duty service in each locality. \neg If you are reporting an adult at risk who lives in South Monmouthshire, you can speak to someone on telephone number 01291 635666. \neg

If you are reporting an adult at risk who lives in Abergavenny area, you can speak to someone on telephone number 01873 735885. — If you are reporting an adult at risk who lives in Monmouth area, you can speak to someone on telephone number 01600 775100. Outside of office hours you can contact the Adult Services Emergency Duty Team on 0800 3284432.

Norfolk Safeguarding Children Partnership

Norfolk Safeguarding Children Boards Thresholds and CADS procedures

https://www.norfolklscb.org/people-working-with-children/how-to-raise-a-concern/

https://www.norfolklscb.org/

- Children's Advice and Duty Service: 0344 800 8021
- Norfolk Multi Agency Safeguarding Hub (MASH). 0344 800 8020.
- LADO LADO@norfolk.gov.uk

Nottingham Council

http://www.nottinghamcity.gov.uk/ncscb

Tel: <u>0115 876 4800</u> <u>candfdirect@nottinghamcity</u>

Stoke-On-Trent and Staffordshire Safeguarding Children Board

https://www.staffsscb.org.uk/Home.aspx

- Staffordshire First Response Team (Children) 0800 1313126
- Stoke-on-Trent Safeguarding Referral Team (Children) 01782 235100
- Staffordshire Police MASH Team (Professionals only) 01785 235350
- Staffordshire LADO 0800 1313126 www.staffordshire.gov.uk/reportconcern

Allegations against staff policy:

www.staffsscb.org.uk (Staffordshire)

www.safeguardingchildren.stoke.gov.uk (Stoke-On-Trent)

Regional Child Protection procedures for West Midlands

http://westmidlands.procedures.org.uk/

Essex Safeguarding Children Board

https://www.escb.co.uk/

Children and Families Hub on 0345 603 7627

Out of hours: (Mon-Thurs 5.30pm-9am. Fri & Bank Holidays 4.30pm-9am) 0345 606 1212 Email: Emergency.DutyTeamOutOfHours@essex.gov.uk

Essex duty LADO (Local Authority Designated Officer)

Telephone: 03330 139 797

National Contacts

- Police (Non-emergency 101)
- CEOP (Child Exploitation and Online Protection) http://ceop.police.uk/
- Professionals Online Safety Helpline 0844 381 4772 www.saferinternet.org.uk/helpline
- Internet Watch Foundation (IWF) http://www.iwf.org.uk
- Safer Internet Centre <u>helpline@saferinternet.org.uk</u>
- Childline 0800 1111 www.childline.org.uk
- Ofsted General enquiries: 0300 123 1231

About Schools: 0300 123 4234 Concerns: 0300 123 4666

e-mail: enquiries@ofsted.gov.uk

- HM Government (advice on protecting children from radicalisation for parents, teachers and leaders) <u>www.educateagainsthate.com</u>
- NSPCC Harmful Sexual Behaviour project: 0844 892 0273

Appendix 5: Safeguarding and international students

Monitoring

We expect our safeguarding policy to be applied in full, irrespective of whether students are based in the UK or studying from their home / remotely overseas. This means that we would expect staff to be vigilant in relation to possible instances where a student based overseas becomes the subject of a concern. We would expect staff to gather evidence and report to the Designated Safeguarding Lead (DSL). However, clearly, the protocols for enacting a referral through the DSL to local agencies in the town / country of the student's residence will vary according to the situation. Nonetheless, we will in all cases, make every effort to enact a referral in every case, to record and track progress with this referral in the normal ways articulated in this policy.

Referral

In the first instance, we would endeavour to contact the relevant foreign embassy or High Commission of the country in question so as to identify the relevant local / district authority and, in turn, the children's services / safeguarding agency involved to discuss the case concerned. Initially, this involves utilising the London Diplomatic List as attached at:

https://www.gov.uk/government/publications/foreign-embassies-in-the-uk

in order to reach the relevant consulate office. Upon reaching the relevant office, our intention will be to:

- Identify the relevant children's services authority for the country / region / district in which the relevant student lives and, if necessary
- Identify the relevant police authority for the country / region / district concerned, but only should the referral type merit this
- The DSL will inform parents at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.
- Make known our safeguarding concerns in the usual manner, establishing that dataprotection requirements and confidentiality arrangements will need to apply
- Request information on the intended response the relevant agency will make in respect of our referral and how we will be contacted in order to establish an update
- Keep the usual records about the case, including any witness statements gathered and to monitor, at regular intervals, progress with the case.





