



Child Protection and Safeguarding Policy

Date of approval	September 2023 Updated March 2024
Date of review	September 2024
Signed: Executive Headteacher	M Talbot
Signed: Chair of Governors	M Hall

Document History

Date	Change Reference	Summary of Change
17/07/2023	All through document	Updated to reflect new KCSIE Sept 2023 (see following table) and multiple changes in staff and staff roles/responsibilities The specific changes stated below are based on the suggested adaptations in the model child protection and safeguarding policy from The Key
	Important contacts	Additional local and national contacts added
	Section 2 Section 6	Reference and link added to the locally agreed procedures that are followed based on statutory guidance
	Section 5	DSL responsibilities as outlined by Milton Keynes Council added
	Section 7.1, 7.3, 7.4 Appendix 2 Appendix 3 – section 1	Generic descriptions of practice and procedures made specific, reflecting and referencing the local procedures we must follow as stated in the MK Together – Milton Keynes Safeguarding Children Partnership Procedures Manual
	Section 7.9	Stated explicitly where the issues surrounding the sharing of nudes and semi nudes are taught in our curriculum
	Section 7.10	Updated to state what our specific reporting systems are for children
	Section 8	Added the specific strands our online safety curriculum covers and a reference to our other policies on these
	Section 10	Stated the specific support we put in place for children with communication barriers
	Section 14	Updated to reflect the new system for recording and storing concerns - CPOMs
	Appendix 3 – section 2	Generic descriptions of procedures for sharing low level concerns removed and a separate low level concern policy created and referenced here.
04/03/2024	Section 7	Added contact details of who to escalate to locally
	All through document	Updated to reflect new Working Together to Safeguard children (Dec 2023) and updates to the Prevent duty guidance (effective from 31 December 2023) – see table below for where these changes have occurred

Changes made to reflect KCSIE 2023 – July 2023.

POLICY SECTION	WHAT'S CHANGED?	WHY?
Section 3	Updated definitions of safeguarding and child protection, including adding references to online safety	To reflect changes to Working Together to Safeguard Children (Introduction)
Section 3	Updated language to reflect that 'clinical commissioning groups' are now known as 'integrated care boards'	To reflect changes to KCSIE (paragraph 108)
Section 4	Added reference to the fact that some children have an increased risk of abuse, both online and offline Clarified that the school will give special consideration to pupils who are missing or absent from education for prolonged periods and/or repeat occasions	To reflect changes to KCSIE (paragraph 170) To reflect changes to KCSIE (paragraph 175)
Section 5	Added reference to the fact that schools should have a zero tolerance culture towards transphobia	To increase the categories of inclusiveness in the policy
Section 5.1	Added adaptable text to mention that all staff will be aware of online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring Added further examples of abuse and threats for staff to be aware of	To reflect changes to KCSIE (paragraph 14) To reflect changes to Working Together to Safeguard Children (paragraph 123)
Section 5.2	Added online safety, including filtering and monitoring processes, to the designated safeguarding lead's (DSL's) responsibilities Added making sure that staff have appropriate Prevent training and induction, to the designated DSL's responsibilities Added recognition that DSLs may need to act as a lead practitioner for the local authority	To reflect changes to KCSIE (Annex C, page 164) To reflect updates to the Prevent duty guidance (paragraphs 63 and 159) To reflect changes to Working Together to Safeguard Children (paragraph 141)

POLICY SECTION	WHAT'S CHANGED?	WHY?
Section 5.3	<p>Added the responsibility of governors to:</p> <ul style="list-style-type: none"> • Make sure that the school has appropriate filtering and monitoring systems in place and review their effectiveness • Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards • Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role • Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners • Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training 	To reflect changes to KCSIE (paragraphs 103, 124, 142)
Section 5.4	Added the responsibility of the headteacher to make sure that online safety training is included in staff safeguarding and child protection training	To reflect changes to KCSIE (Annex A, page 136)
Section 7	Added further information regarding the identification and recognition of forms of abuse, neglect and exploitation and the potential for early help	As outlined in Working Together to Safeguard Children (paragraph 124)
Section 7.7	Added that if the school receives an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, you should follow your safeguarding policies and procedures and inform the local authority designated officer (LADO), as you would with any safeguarding allegation	To reflect changes to KCSIE (paragraph 377)
Section 8	<p>Indicated where you should include information about your filtering and monitoring systems, if these are not detailed in a separate online safety policy</p> <p>Add reference to the duty to review the child protection and safeguarding policy, including online safety, annually, and to make sure the procedures and implementation are reviewed regularly</p>	<p>To reflect changes to KCSIE (paragraph 138)</p> <p>More detail, in line with KCSIE (paragraph 99)</p>

POLICY SECTION	WHAT'S CHANGED?	WHY?
Section 14	Removed reference about retaining records for allegations that involve sexual abuse	This is no longer a requirement, as the Independent Inquiry into Child Sexual Abuse (IICSA) has concluded and published its final report . The requirement has been removed from KCSIE 2023 (paragraph 417)
Section 15.1	Added reference to the fact that training for all staff should include online safety, including an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring	To reflect changes in KCSIE (paragraph 124)
Section 15.2	Added that the DSL or designated Prevent lead should take more in-depth Prevent awareness training, including on extremist and terrorist ideologies	To reflect updates to the Prevent duty guidance (paragraphs 63 and 159)
Appendix 2: safer recruitment policy - shortlisting	Added a sentence setting out that shortlisted candidates will be informed that the school may carry out online checks as part of the due diligence process	To reflect changes in KCSIE (paragraph 221)
Appendix 3: allegations against staff (including low-level concerns) policy Section 1	<p>Added a sentence setting out that the school will follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children</p> <p>Removed reference about retaining records for allegations that involve sexual abuse</p>	<p>To reflect changes in KCSIE (paragraph 377)</p> <p>This is no longer a requirement, as the Independent Inquiry into Child Sexual Abuse (IICSA) has concluded and published its final report. As such, the requirement has been removed from KCSIE 2023 (paragraph 417)</p>

POLICY SECTION	WHAT'S CHANGED?	WHY?
Appendix 4: specific safeguarding issues	Updated language to change 'children missing from education' to 'children who are absent from education'	To reflect changes in KCSIE (pages 144 and 145, and paragraph 175)
Appendix 4: specific safeguarding issues – forced marriage	Added the fact that it is illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not used	To reflect a law change in February 2023 – see KCSIE pages 155 and 156
Appendix 4: specific safeguarding issues – preventing radicalisation	Added that the DSL, or designated Prevent lead, should undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies	To reflect updates to the Prevent duty guidance (paragraphs 63 and 159)

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Important contacts

Great Linford Primary School Safeguarding contacts	
Head of School: Name: Alex Dixon Contact details: 01908 605027	Designated child sexual exploitation lead: Name: Alex Dixon Contact details: 01908 605027
Designated Safeguarding Lead: Name: Alex Dixon Contact details: 01908 605027 Alex.dixon@greatlinfordprimaryschool.co.uk	Designated CLA (Looked After Children and Previously Looked After Children) Lead: Name: Alex Dixon Contact details: 01908 605027
Deputy Designated Safeguarding Leads: Name: Richard Jenkin Name: Carol Mallett Name: Julie Newton Name: Mike Talbot Contact details: 01908 605027 *A consultation within the team will usually be made before any action is taken.	Mental Health Lead: Name: Carol Mallett Contact details: 01908 605027
Designated online safety lead Name: Richard Jenkins Contact details: 01908 605027	Chair of Governing Body: Name: Myra Hall Contact details: 01908 605027
Designated Prevent lead: Name: Alex Dixon Contact details: 01908 605027	Designated Safeguarding Governor: Name: Myra Hall Contact details: 01908 605027
FGM lead: Name: Alex Dixon Contact details: 01908 605027	Designated Governor for Safer Recruitment: Name: Myra Hall Contact details: 01908 605027
Milton Keynes/National Safeguarding contacts	
Multi-Agency Safeguarding Hub (MASH): Contact details: 01908 253169 / 253170 children@milton-keynes.gov.uk Emergency Social Work Team 01908 265545	Local Authority Designated Officer (LADO): Name: Jo Clifford and Debbie Young Contact details: 01908 254307 lado@milton-keynes.gov.uk
Early Help Assessment queries Contact details: 01908 253169/253170 EHA@milton-keynes.gov.uk	MK Together Safeguarding Partnership Contact details: 01908 254373 MKTogether@milton-keynes.gov.uk
Whistleblowing hotline: 01908 794051 NCPCC Whistleblowing advice: 0800 0280285 help@nspcc.org Protect: 020 31172520 https://protect-advice.org.uk/advice-line/	PREVENT duty Contact details: To send referrals: Preventreferralsmiltonkeynes@thamesvalleypolice.pnn.police.uk For general enquiries and advice: 01865 555618 PreventGateway@thamesvalley.police.uk
Channel helpline: 020 7340 7264 https://report-extremism.education.gov.uk/	Children Missing Education Team Contact details: 01908 253338 Cme@milton-Keynes.gov.uk

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 trained 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 \(2023\)](#) and [Working Together to Safeguard Children \(2023\)](#), and the [Governance Handbook](#). We comply with this guidance and with the procedures and arrangements that have been agreed and published locally by our 3 local safeguarding partners, who work as [MK Together](#).

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 1 person conducting an interview to be trained in safer recruitment techniques
- › [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
- › [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- › [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- › Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- › [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- › [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- › [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and Head of School should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- › [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

- › The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children
- › This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

2.1 Local procedures based on statutory guidance

Great Linford Primary School ensures it is compliant with multi-agency child protection procedures that have been agreed locally through Milton Keynes [Mk Together](#), which are based on the statutory [Working Together to Safeguard Children \(2023\)](#).

[MK Together Safeguarding Partnership Inter-Agency Child Safeguarding online Policies and Procedures](#) include detailed chapters on:

- What to do if you have a concern
- How to make a referral
- Safer recruitment guidance
- Managing allegations against staff (LADO guidance)
- Additional guidance on more specialist safeguarding topics.

[MK Together levels of need document](#) provides guidance on procedures when identifying and acting on child safety and welfare concerns, including:

- The four levels of intervention from early help to child protection and the criteria that define these.
- When and how to make a referral to Milton Keynes Multi Agency Safeguarding Hub (MASH).
- When and how to access additional support through Children and Family practices

The Designated Safeguarding Lead, staff and governors are aware of the guidance, its implications and the need to ensure that child protection issues are addressed using these agreed procedures.

3. Definitions

Safeguarding and promoting the welfare of children means:

- › Providing help and support to meet the needs of children as soon as problems emerge
- › Protecting children from maltreatment **whether that is within or outside the home, including online**
- › 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

Child protection is part of this definition and refers to activities undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. **This includes harm that occurs inside or outside the home, including online.**

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.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

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)
- › Integrated care boards (previously known as clinical commissioning groups) for an area within the LA
- › The chief officer of police for a police area in the LA area

Within Milton Keynes, the safeguarding partners work as [MK Together](#)

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

4. Equality statement

Some children have an increased risk of abuse, both online and offline, 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 and/or disabilities (SEND) or health conditions (see section 10)
- › 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 12)
- › Are missing or absent from education for prolonged periods and/or repeat occasions
- › Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors 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.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia, transphobia and sexual violence/harassment. This will be underpinned by our:

- › Behaviour policy

- › Pastoral support system
- › Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
 - Healthy and respectful relationships
 - Boundaries and consent
 - Stereotyping, prejudice and equality
 - Body confidence and self-esteem
 - How to recognise an abusive relationship (including coercive and controlling behaviour)
 - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
 - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

All staff will:

- › Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually
- › Sign a declaration at the beginning of each academic year to say that they have read, understood and will adhere to the guidance
- › Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- › Provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns

All staff will be aware of:

- › Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and DSL team, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- › The early help assessment 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-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- › New and emerging threats, including online harm, grooming, sexual exploitation, criminal exploitation, radicalisation, and the role of technology and social media in presenting harm
- › The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

- › The fact that children can be at risk of harm inside and outside of their home, at school and online
- › The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children
- › **That a child and their family may be experiencing multiple needs at the same time**
- › What to look for to identify children who need help or protection
- › Online safety which includes the expectations, applicable roles and responsibilities in relation to filtering and monitoring

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 DSL is Alex Dixon (Head of School). The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

Outside of term time, the DSL can be contacted via email alex.dixon@greatlinfordprimaryschool.co.uk

When the DSL is absent, the deputies – Richard Jenkins (DHT), Carol Mallett (Learning Mentor), Julie Newton (Learning Mentor) and Mike Talbot (Executive Headteacher) – will act as cover.

If the very rare instance occurs that the lead DSL and all deputies are not available, ring the MASH on 01908 253169

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
- › Have a good understanding of harmful sexual behaviour
- › Have a good understanding of the filtering and monitoring systems and processes in place at our school
- › **Make sure that staff have appropriate Prevent training and induction.**
- › **Act as a lead practitioner for the local authority if required (not currently the case for our DSL)**

The DSL will also:

- › Keep the Executive Headteacher informed of any issues
- › Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- › Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- › Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- › Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

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

Designated Safeguarding Lead responsibilities outlined by Milton Keynes Council

Full details of the Designated Safeguarding Lead's responsibilities can be found in Keeping Children Safe in Education, 2023. In summary responsibilities include:

- Develop a culture of safeguarding, ensuring that every member of staff, in whatever role they have, understands the importance of their part within it.
- Ensuring that child protection procedures are followed within the school and to make appropriate, timely referrals to the Milton Keynes Multi-Agency Safeguarding Hub (MASH) in accordance with the Milton Keynes Together multi-agency safeguarding procedures.
- Ensuring that all staff employed within the school, including temporary staff and volunteers, are aware of the school's internal procedures in addition to the government guidance Keeping Children Safe in Education, 2023; to advise other staff; and to offer support to those requiring this.
- Undertaking specialist child protection training as necessary. This will be updated at a minimum of every two years. Designated Safeguarding Leads will also receive training on managing allegations, female genital mutilation, child sexual exploitation, child criminal exploitation, Internet safety, SEND, child on child and Prevent (as per KCSIE 2023), and will be available to provide advice and support to staff on these issues.
- Oversee the internet safety policy and procedures within the school
- Linking with the MK Together and ensure that all staff are aware of any relevant training opportunities, as well as updates in local policies on safeguarding.
- Ensuring a statement is published that informs parents and carers about the school's duties and responsibilities under child protection procedures. The school must publish its child protection policy online on the school website and make copies available to parents on request. Staff are required to sign to say they have read, understood and will adhere to the CP policy.

5.3 The governing board

The governing board will:

- › Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- › Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head of School to account for its implementation
- › Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- › Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- › Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- › Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- › Make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head of School or Executive Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

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

5.4 The Head of School

The Head of School 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
 - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- › Communicating this policy to parents/carers 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 updating the content of the training 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)
- › Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- › Ensuring the relevant staffing ratios are met, where applicable
- › Making sure each child in the Early Years Foundation Stage is assigned a key person
- › Overseeing the safe use of technology, mobile phones and cameras in the setting

5.5 Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

6. Confidentiality

- › 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 UK 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
- › If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
 - The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- › Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
 - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- › The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- › Local guidance from MK Together on confidentiality and information sharing can be found [here](#)

- › If staff are in any doubt about sharing information, they should speak to the DSL (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 governors must follow the procedures set out below in the event of a safeguarding issue. **All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation.** 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

If you believe that a child is in immediate danger, you should contact the relevant emergency services by ringing 999. If you believe a child is suffering or likely to suffer harm, make a referral to children’s social care **immediately. Anyone can make a referral.** Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

The referral route to Children’s Social Care in Milton Keynes is through the MASH - Milton Keynes’s Multi-Agency Safeguarding Hub

- Call MASH on 01908 253169 or 01908 253170 9am-5pm Mon-Thurs and 9am-4.30pm on Friday and share your concerns
- Outside of these hours contact the emergency social work team on 01908 265545
- Complete the [Multi Agency Referral Form \(MARF\)](#)

Further information about contacting the MASH can be found here:

- <https://www.milton-keynes.gov.uk/children-young-people-families/children-s-social-care/worried-about-a-child>
- <https://www.milton-keynes.gov.uk/children-young-people-and-families/milton-keynes-multi-agency-safeguarding-hub-mash>

Further information about the Milton Keynes’s referral process can be found here:

- <https://miltonkeynesscp.trixonline.co.uk/chapter/referrals#the-duty-to-refer>

New referrals and referrals on closed cases should be made to Milton Keynes MASH on 01908 253169. Referrals on open cases should be made to the child's allocated social worker (or in their absence their manager or the duty social worker). Unless there is immediate risk of significant harm, the family should be consulted by the referrer and informed of the referral. Referrals on open social care cases should be made to the allocated social worker for the case (or in their absence the manager or the duty social worker). The referrer can always ask to discuss their concerns with a qualified social worker.

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.

The school understands that it will continue to play a role after any referral. It recognises the importance of multi-agency working and will enable staff to attend / contribute appropriately to relevant meetings including Child Protection Strategy Meetings; Family Support (Child in Need) Meetings; Child Protection Conferences; Core Groups; Child Care Reviews.

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
- › Log the disclosure as a cause for concern on CPOMs as soon as possible. Use the child's own words. Stick to the facts, and do not put your own judgement on it. If you feel the disclosure is serious, verbally speak to a DSL first before logging the incident.
- › 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. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- › Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- › Not recognise their experiences as harmful
- › Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child

See our safeguarding checklists provided via email, shared on induction and shared at training.

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

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 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police, personally. This is a [mandatory 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 should speak to the DSL and follow our local safeguarding procedures.

Local procedures are detailed in the MK Together Safeguarding Partnership Procedures Manual:

<https://www.milton-keynes.gov.uk/children-young-people-families/children-s-social-care/worried-about-a-child>

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 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.

Share them with the DSL by logging them on CPOMs

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.

You can also make a referral to the 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

All staff are expected to be alert to the potential need for early help for a child who:

- Is disabled
- Has special educational needs (whether or not they have a statutory education health and care plan)
- Is a young carer
- Is bereaved
- Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime
- Is frequently missing/goes missing from care or home
- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- Is at risk of being radicalised or exploited
- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online
- 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
- Is suffering from mental ill health
- Has returned home to their family from care
- Is at risk of so-called 'honour'-based abuse such as female genital mutilation or forced marriage
- Is a privately fostered child
- Has a parent or carer in custody
- Is missing education, or persistently absent from school, or not in receipt of full-time education
- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

Early help assessment

If an early help assessment 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.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

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.

Early Help Assessment (EHA) in Milton Keynes

Early Help is a response offered by all services in Milton Keynes who are in contact with children, young people and families when an unmet need is identified as outlined in [Working Together to Safeguard Children \(2023\)](#), which emphasises the crucial role of effective Early Help being a collective responsibility of all agencies to identify, assess and provide effective Early Help services

To access additional Early Help services, an [Early Help Assessment Form](#) can be used by all agencies working with children and their families to identify and agree what extra help may be needed to support a child or young person at an early stage. An [Early Help Directory](#) has been compiled to support children and families living in difficult family circumstances to ensure that they benefit from the high-quality professional help at the earliest opportunity

What does the Early Help Assessment do?

- **Assesses what support families need:** The Lead Professional will complete an assessment with the family to understand what is going well, what people are worried about, and what support the family needs to achieve their goals.
- **Creates a plan and checking how well it is working:** The Lead Professional will support the family to create a plan that works for them so the family has the support and help they need. Everyone will check that the plan is working so we know that we will get to our goal.
- **Effective early help:** This relies upon local organisations and agencies working together to identify children and families who would benefit from support, undertaking an assessment of the need and providing targeted services to address the needs of a child and their family. Effective early help relies upon local agencies working together to:
 - Identify children and families who would benefit from early help
 - Make an assessment of the need for early help
 - Provide targeted early help services to address the assessed needs of a child and their family.
 - Help focus on activity to significantly improve the outcomes for the child. If those needs turn to risks, then these assessments can also help to demonstrate the need for statutory intervention when early support has not improved outcomes for the child.
- **Team around the Family or TAF:** This is an effective method of partner working. It is a good opportunity for all practitioners, along with parents, children and young people to discuss the situation. This can include strengths, needs, issues, options for resolutions, plans for support and services. Discussions will also include how to progress with these.

Early Help Advisors

Three Early Help Advisors are available to help with your Early Help Assessment/TAF queries. They will help you embed TAF in your school, college or nursery. The advisors offer a hands on approach for partners. They also provide bespoke support to help with the TAF process. They will help you improve the quality of your assessments and action plans. Early Help advisors work within MASH and are easily accessible via their own dedicated email EHA@milton-keynes.gov.uk and via the MASH Team on 01908 253169

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. See <https://miltonkeynesscp.trixonline.co.uk/chapter/referrals#introduction> for further information about the referral process in Milton Keynes.

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.

Local escalation procedures:

If the referrer disagrees with the decisions made by Children's Social Care about the outcome of the referral, it is first expected that practitioners have a dialogue and explore the issues behind the disagreement **in order to reach a shared understanding and agree necessary action. If the issue is not resolved, the referrer should discuss their concerns with the DSL (if the referrer is not the DSL). If the referrer is the DSL they will discuss their concerns with the Executive Headteacher to consider escalating the issue with the Case Holding Team Manager within Children's Social Care. Where understanding/interpretation of risk is a relevant factor and significant concerns remain, the DSL or Executive Headteacher will discuss the concerns with the Head of Family Support Services or the Head of Corporate Parenting (CSC). There contact details are:**

Head of Family Support Services (CSC) – Candice Boatswain: candice.boatswain@milton-keynes.gov.uk

Head of Corporate Parenting (CSC) – Sharon Godfrey: Sharon.godfrey@milton-keynes.gov.uk

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 [Channel](#), 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.

Professionals who are concerned that a MK resident is vulnerable to being radicalised can raise their concerns by completing the [Prevent National Referral Form](#) and submit to preventreferralsmiltonkeynes@thamesvalley.pnn.police.uk

For advice on completing the form, contact the Prevent Gateway Team by email: PreventGateway@thamesvalley.police.uk or calling 01865 555618

The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors 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.

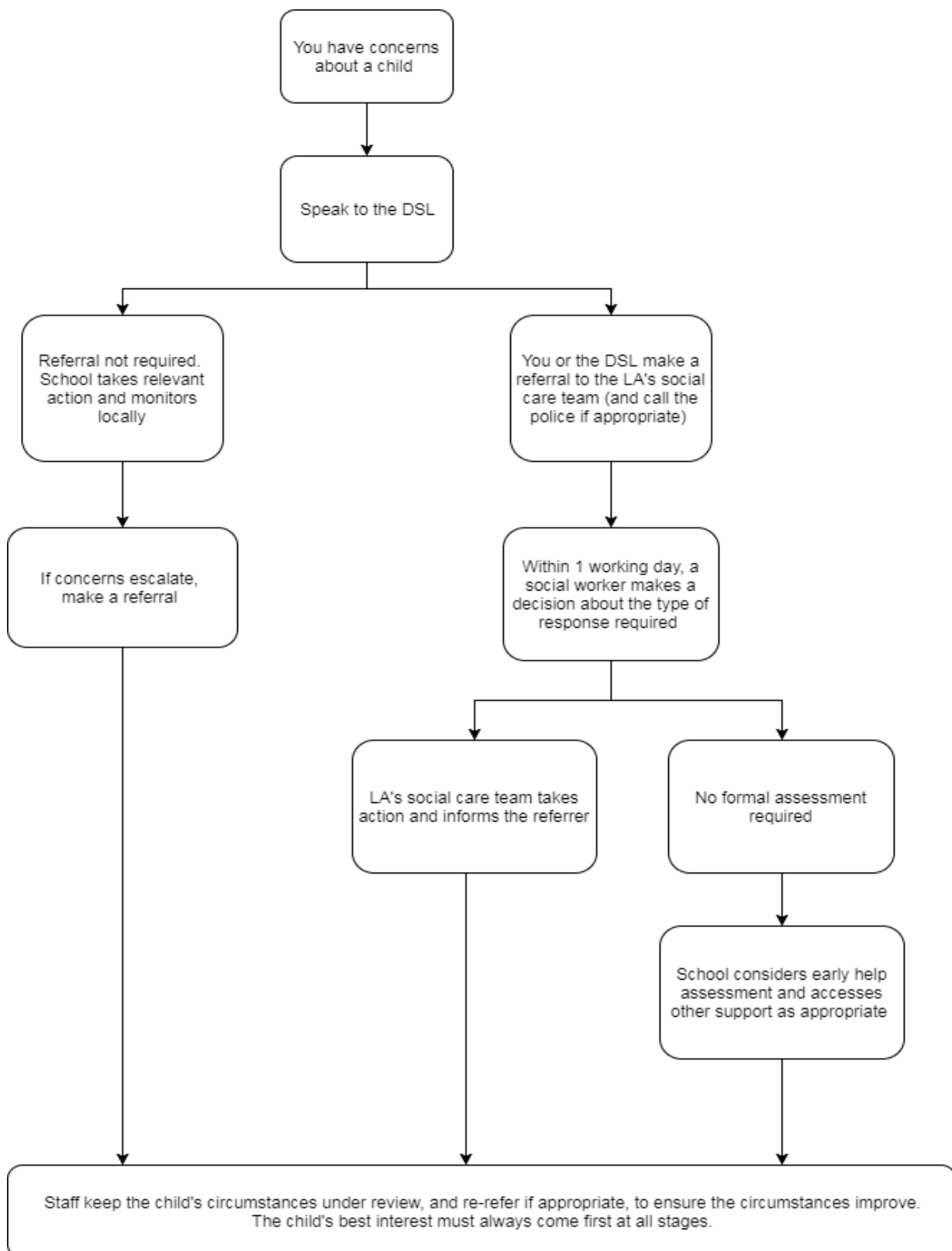
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

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 or the Mental Health Lead (Carol Mallet) to agree a course of action.

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 adults on the premises - a staff member, supply teacher, volunteer, contractor, external organisations/individuals running activities

If you have any concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk

of harm to children, speak to the Head of School as soon as possible. If the concerns/allegations are about the Head of School or Executive Headteacher, speak to the chair of governors.

The Head of School/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Head of School, report it directly to the local authority designated officer (LADO).

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.8 Allegations of abuse made against other pupils – child on child abuse

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

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

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

See appendix 4 for more information about child-on-child abuse.

Procedures for dealing with allegations of child-on-child abuse

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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Creating a supportive environment in school and minimising the risk of child-on-child abuse

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

To achieve this, we will:

- › Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- › Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- › Ensure staff reassure victims that they are being taken seriously
- › Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- › Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- › Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- › Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
 - Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
 - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
 - That they should speak to the DSL if they have any concerns
 - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

7.9 Sharing of nudes and semi-nudes ('sexting')

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

- › View, copy, print, share, store or save 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 may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

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

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

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101

Recording incidents

All incidents of sharing of nudes and semi-nudes, 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 these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our RSE using our Jigsaw curriculum. This is covered in the Year 6 unit of work 'Changing Me'. It is also taught as part of the online safety coverage within of our computing curriculum. This is covered in the Year 6 'Online relationships' strand using the Project Evolve online safety lesson 'What's the impact?'.

Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- › 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 and when it may be deemed as online sexual harassment
- › 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

7.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

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

Pupils can report concerns in person to a trusted adult on their 'protective hand' or by putting a worry in their class worry box for their class teacher to read. The adult who the child has chosen to share their concern with will then support the pupil and report the child's concern to the DSL. Our mental health lead has also set up Place2Talk slips that children can fill in to book some time to talk directly to them.

Pupils create their protective hand for their classroom display at the start of each academic year. They list adults on each of the fingers who they trust and feel comfortable talking to- adults who they know will listen to them, care about them, believe them and help them. Protective hands are referenced regularly throughout the year during circle times, assemblies and PSHE lessons.

Staff are made aware that they should encourage this trusted relationship but also be mindful of retaining professional boundaries, in line with the code of conduct.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- › Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- › **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- › **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- › **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

- › **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

- › Educate pupils about online safety as part of our curriculum. For example:
 - The safe use of social media, the internet and technology
 - Keeping personal information private
 - How to recognise unacceptable behaviour online
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Our online safety curriculum covers the following strands:

- Self image and identity
- Online relationships
- Online reputation
- Online bullying
- Managing online information
- Health, wellbeing and lifestyle
- Privacy and security
- Copyright and ownership

The objectives within these strands are delivered through parts of our PSHE Jigsaw curriculum and half termly online safety lessons as part of our computing curriculum, using the Project Evolve scheme.

- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- › Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-directed time when pupils are not present
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- › Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems – see Online Safety Policy.
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

- › Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
- › Review the child protection and safeguarding policy, including online safety, annually, and to make sure the procedures and implementation are reviewed regularly

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our standalone policies on online safety and mobile phones.

9. Notifying parents or carers

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

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

If we believe that notifying the parents or carers 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 or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

In the case of allegations of abuse made against other children, the DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- › Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- › Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers.

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 condition without further exploration
- › Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- › The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- › Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils if appropriate. This could include check ins with our learning mentors.

Children with communication barriers will have a key adult who builds a trusting relationship with them and through doing this can tune in to how they communicate. This will usually be a learning support assistant from the child's year group who works with them on a daily basis but may also be one of the learning mentors.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

11. 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

12. 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 a designated teacher, Alex Dixon support by Carol Mallet, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- › Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- › Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

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

See the Complaints policy. A copy of this can be found on the Policies drive and in the staffroom.

13.3 Whistle-blowing

See the LA Whistle-blowing policy. A copy of this can be found on the Policies drive and in the staffroom.

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.

Records will include:

- › A clear and comprehensive summary of the concern
- › Details of how the concern was followed up and resolved
- › A note of any action taken, decisions reached and the outcome

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily 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 as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

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.

Records are stored electronically on CPOMs. Where children join the school with paper based records, these are scanned and uploaded to CPOMs. The paper records are then destroyed.

When children transition to a new school, their records are securely passed on. If the new school uses CPOMS, once the student(s) officially leave/ move school and their UPN is added identically at both schools (within the MIS) the transfer between CPOMS will be detected automatically. (Assuming the student has incidents logged against them). Once detected, the new school will receive a notification to 'Request' the transfer at their side. On request, the previous school will receive a similar notification, this time to 'Authorise' the transfer at their side. If the new school does not use CPOMS, these are downloaded and sent using secure email to the new school marked as CONFIDENTIAL and FAO the DSL.

Information is shared with outside agencies securely, generally verbally within meetings, or via a phone call to MASH. This is then transferred in writing via the online MARF. Milton Keynes Children and Families MultiAgency Referral Form (MARF) - MyCouncil (milton-keynes.gov.uk)

In addition:

- › Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment 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 and online safety, 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 integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- › Be in line with advice from the 3 safeguarding partners
- › Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all pupils

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.

All staff will receive training to identify FGM and covering how to identify the signs and the mandatory duty to report.

All Staff, who have access to internet connectable devices or work with children who access devices, will receive online safety training to teach them how to keep safe online, how to support students to keep safe online and how to ensure parents have the information to keep safe online. It will also include an understanding of the expectations, roles and responsibilities in relation to filtering and monitoring.

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

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 Deputy

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, or any other designated Prevent lead, will also undertake more in-depth Prevent awareness training, including on extremist and terrorist ideologies.

15.3 Governors

All governors receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- › Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- › Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Head of School or Executive Headteacher, they receive training in managing allegations for this purpose.

15.4 Recruitment – interview panels

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. This training should be updated every three years.

See appendix 2 of this policy for more information about our safer recruitment procedures.

15.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

16. Monitoring arrangements

This policy will be reviewed **annually** by Alex Dixon (Head of School/DSL). At every review, it will be approved by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

- › Behaviour policy
- › Anti-bullying policy
- › Staff code of conduct
- › Complaints
- › Whistleblowing
- › Data protection and data retention policies
- › Health and safety policy
- › Attendance policy
- › Online safety policy
- › Low level concerns policy
- › Safer recruitment policy
- › Use of Mobile phones, devices and smartwatch policy
- › Acceptable use policy
- › Equality policy
- › Positive handling procedures
- › Relationships and sex education policy
- › First aid policy
- › Supporting pupils with medical conditions policy
- › Children with Health needs who cannot attend school policy
- › Curriculum
- › Designated teacher for looked-after and previously looked-after children
- › Privacy notices

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 1 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 cyber-bullying), 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 non-penetrative 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: safer recruitment and DBS checks – policy and procedures

Safer recruitment policy

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- › Our school's commitment to safeguarding and promoting the welfare of children
- › That safeguarding checks will be undertaken
- › The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children and the responsibility for promoting and safeguarding the welfare of the children
- › Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- › Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- › Include a copy of, or link to, our child protection and safeguarding policy
- › Obtain identifying details of the applicant including current and former names, current address and National Insurance Number;
- › Obtain a statement of any academic and/ or vocational qualifications with details of awarding body and date of award;
- › Obtain a full history in chronological order since leaving secondary education, including periods of any post-secondary education/training and part-time and voluntary work as well as full time employment, with start dates, explanations for periods not in employment or education/training and reasons for leaving employment;
- › Obtain details of 2 referees. It will request that the first referee is the applicant's present or most recent employer and that this be the Headteacher or equivalent person if this employment is in education. Where an applicant is not currently working with children, but has done so in the past, it will request that a referee is provided from their most recent work with children. It will make clear that references will not be accepted from relatives or friends.
- › Obtain a statement of the skills and abilities, and competencies/experience that the applicant believes are relevant to their suitability for the post and how they meet the person specification;

Shortlisting

Our shortlisting process will involve at least 2 people. The same selection panel will shortlist and interview the candidate. At least one member of the panel will have undertaken safer recruitment training.

All application forms will be scrutinized to ensure:

- They are fully and properly completed;
- The information is consistent and does not contain any discrepancies;
- Gaps in employment/training or a history of repeated changes of employment are identified

Incomplete applications will not be accepted.

Any potential concerns, anomalies, discrepancies or gaps in employment and the reasons for this will be noted, so that they can be taken up as part of the consideration of whether to shortlist the applicant, as well as a history of repeated changes of employment without any clear career or salary progression or a mid career move from a permanent to temporary post.

All candidates will be assessed equally against the criteria contained in the person specification.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- › Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
 - If they have a criminal history
 - Whether they are included on the barred list
 - Whether they are prohibited from teaching
 - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
 - Any relevant overseas information
- › Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

We will obtain references for all shortlisted candidates, including internal ones, before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

Where a reference has not been obtained on the preferred candidate before the interview, once received it should be scrutinised and any concerns resolved satisfactorily before the person's appointment is confirmed.

When seeking references we will:

- › Not accept open references
- › Not accept personal email addresses as contact information, instead asking for the individual's work email
- › Liaise directly with referees and verify any information contained within references with the referees
- › Include a copy of the job description and person specification and a reference proforma to ensure that we obtain objective and factual information to support appointment decisions
- › Ensure any references are from the candidate's current employer and completed by a senior person (not from a colleague within the organization). Where the referee is school based, we will ask for the reference to be confirmed by the Head of School/Headteacher as accurate in respect to disciplinary investigations
- › Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- › Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

Our reference proforma will ask:

- How long they have known the candidate and in what capacity and confirmation of details of the applicant's current post and salary.
- Judgements and comments about the applicant's ability and suitability to undertake the job
- Whether the applicant has been the subject of any disciplinary sanctions and whether the applicant has had any allegations made against them or concerns raised, which relate either to the safety and welfare of, or the applicants behaviour towards, children and young people. Details about the outcome of any such concern should be sought;
- Whether the referee is satisfied that the candidate is suitable to work with children/young people. If not, for details of the referee's concerns and the reason why the person might be unsuitable.

On receipt of references we will:

- Check that all questions have been answered satisfactorily
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Any information about past disciplinary actions should be considered in the circumstances of the individual case. Cases in which an issue was satisfactorily resolved some time ago or an allegation determined to be unfounded or did not require formal disciplinary sanctions, and in which no further issues have been raised, are less likely to cause concern than more serious or recent concerns, or issues that were not resolved satisfactorily. A history of repeated concerns or allegations over time should give cause for concern.

Interview and selection

A panel of at least two people is recommended, allowing one member to observe and assess the candidate and make notes, while the candidate is talking to the other. One member of the panel should be trained in safer recruitment practice.

The panel will:

- Have the necessary authority to make decisions about the appointment
- Meet before the interview to agree their assessment criteria in accordance with the person specification and to prepare a list of questions they will ask all candidates relating to the requirements of the post;
- Identify any issues they wish to explore with each candidate based on the information provided in their application form and in the references;

The interview should assess the merits of each candidate against the job description and person specification, and explore their suitability to work with children

In addition to assessing and evaluating the applicant's suitability for the post, the panel will explore:

- The candidate's attitude towards children
- Their ability to support the organisation's agenda for safeguarding and promoting welfare;
- Any gaps in the candidate's employment history or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Concerns or discrepancies arising from the information provided by the candidate and/or referee to determine the candidate's suitability to work with children;
- Whether the candidate wishes to declare anything relating to the requirement for a Disclosure and Barring Service check.

The interview should also explore issues relating to safeguarding, including:

- Motivation to work with children/ young people/Adults at Risk;
- Ability to form and maintain appropriate relationships and personal boundaries;

- Emotional resilience in working with challenging behaviours;

Notes of the applicant's interview answers and decisions made will be recorded and then collated and stored electronically by the school business manager.

Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- › Ensure we have received two references
- › Verify their identity
- › Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity. Regulated activity means a person who will be:
 - Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
 - Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
 - Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken

- › Employers must make a judgement about suitability, taking into account only those offences which may be relevant to the post in question. In deciding the relevance the following should be considered:
 - The nature of the appointment;
 - The nature of the offence;
 - The age at which the offence took place;
 - The frequency of the offence.
- › Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher
- › Verify they have completed statutory induction if they are a teacher
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK in the previously. These could include, where available:

- For all staff, including teaching positions: The application process for criminal records checks or 'Certificates of Good Character' for someone from overseas varies from country to country. See: [criminal records checks for overseas applicants](#)
- For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

Where an applicant has worked or been resident overseas in the previous 5 years, the employer should obtain a check of the applicant's criminal record from the relevant authority in that country and seek additional information about an applicant's conduct. Not all countries provide this service and advice can be sought from the Disclosure and Barring Service. GOV.UK, Criminal records checks for overseas applicants.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

All checks should be:

- Confirmed in writing;
- Followed up where they are unsatisfactory or where there are discrepancies in the information provided.
- Documented and retained on the personnel file, subject to restrictions on the retention of information imposed by Disclosure and Barring Service regulations;

Where:

- The candidate is found to be on the Barred Lists, or the Disclosure and Barring Service Disclosure shows they have been disqualified from working with children by a Court;
- The applicant has provided false information in, or in support of, their application;
- There are serious concerns about an applicant's suitability to work with children.

These facts should be reported to the police and/or Disclosure and Barring Service (if they are not already aware). Anyone who is barred from work with children is committing an offence if they apply for, offer to do, accept or do any work which constitutes Regulated Activity. It is also an offence for an employer knowingly to offer work in a regulated position, or to procure work in a regulated position for an individual who is disqualified from working with children, or fail to remove such an individual from such work.

Anyone who is barred from work with children is committing an offence if they apply for, offer to do, accept or do any work constituting Regulated Activity. It is also an offence for an employer knowingly to offer work in a regulated position, or to procure work in a regulated position for an individual who is disqualified from working with children, or fail to remove such an individual from such work.

We maintain a single-central record of the pre-employment checks that we make. A copy of the documents used to verify the successful candidate's identity, right to work and required qualifications are kept in their personnel file.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- › There are concerns about an existing member of staff's suitability to work with children; or
- › An individual moves from a post that is not regulated activity to one that is; or
- › There has been a break in service of 12 weeks or more

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
- › We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › We believe 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

Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- › An enhanced DBS check with barred list information for contractors engaging in regulated activity
- › An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- › Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- › Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- › Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- › Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Post appointment induction

All new staff and volunteers complete an induction. The purpose of the induction is to:

- Provide training and information about the organisation's safeguarding and child protection policies and procedures. This training should be at a level appropriate to the member of staff role and responsibilities with regard to children;
- Support individuals in a way that is appropriate for their role;
- Confirm the conduct expected of staff;
- Provide opportunities for a new member of staff or volunteer to discuss any issues or concerns about their role or responsibilities;
- Enable the line manager or mentor to recognise any concerns or issues about the person's ability or suitability at the outset and address them immediately;
- Ensure that the person receives written statements of:
 - Policies and procedures in relation to safeguarding;
 - The identity and responsibilities of staff with designated safeguarding responsibilities;
 - Safe practice and the standards of conduct and behaviour expected;
 - Other relevant personnel procedures e.g. whistleblowing, disciplinary procedures.

Appendix 3: allegations of abuse made against staff

Allegations against staff policy

This appendix is also based on the procedures in the MK Together Milton Keynes Safeguarding Children Partnership Procedures Manual:

<https://miltonkeynesscp.trixonline.co.uk/chapter/allegations-against-staff-or-volunteers>

Section 1: allegations that may meet the harms threshold

All allegations of abuse of children by those who work with children must be taken seriously. Allegations against any person who works with children, whether in a paid or unpaid capacity, can cover a wide range of circumstances.

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

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

The school will also follow safeguarding procedures and inform the LADO if there's an allegation of an incident happening while an individual or organisation is using the school premises to run activities for children.

An allegation can relate to an adult's behaviour outside work, and their relationships with others, if they:

- › Have behaved in a way in their personal life that raises safeguarding concerns. These concerns do not have to directly relate to a child but could, for example, include an arrest for the possession of a weapon;
- › Have, as a parent or carer, become subject to child protection procedures;
- › Are closely associated with someone in their personal lives (e.g. partner, member of the family or other household member) who may present a risk of harm to child/ren for whom the adult is responsible in their employment/volunteering.

Where appropriate, an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

The concerns should be considered within the context of the four categories of abuse (i.e. physical, sexual and emotional abuse and neglect). These will include concerns relating to inappropriate relationships between members of staff and children or young people, for example:

- › Having a sexual relationship with a child under 18 if in a position of trust in respect of that child, even if consensual. The Police, Crime, Sentencing and Courts Act 2022 has extended the definition within the Sexual Offences Act 2003 section 22A to include anyone who coaches, teaches, trains, supervises or instructs a child under 18, on a regular basis, in a sport or a religion;
- › 'Grooming', i.e. meeting a child under 16 with intent to commit a relevant offence (see s15 Sexual Offences Act 2003);
- › Other 'grooming' behaviour giving rise to concerns of a broader child protection nature (e.g. inappropriate text / e-mail messages or images, gifts, socialising etc.);
- › Possession of indecent photographs / pseudo-photographs of children.

If concerns arise about the person's behaviour in relation to their own children, the police and/or Children's Social Care must consider informing the employer / organisation in order to assess whether there may be implications for children with whom the person has contact at work / in the organisation, in which case this procedure will apply.

The difference between allegation and concern

It might not be clear whether an incident constitutes an 'allegation'. It is important to remember that to be an allegation the alleged incident has to be sufficiently serious as to suggest that harm has or may have been caused to a child/ren or that the alleged behaviour indicates the individual may pose a risk of harm to children (or otherwise meet the criteria above).

If it is difficult to determine the level of risk associated with an incident, the following should be considered:

- › Was the incident a disproportionate or inappropriate response in the context of a challenging situation?
- › Where the incident involved an inappropriate response to challenging behaviour, had the member of staff had training in managing this?
- › Does the member of staff understand that their behaviour was inappropriate and express a wish to behave differently in the future? For example, are they willing to undergo training?
- › Does the child or family want to report the incident to the police or would they prefer the matter to be dealt with by the employer?
- › Have similar allegations been made against the employee – is there a pattern developing?

Incidents which fall short of the threshold could include an accusation that is made second or third hand and the facts are not clear, or the member of staff alleged to have done this was not there at the time; or there is confusion about the account.

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

Where it is decided that the incident does not meet the threshold of harm/risk of harm and is a concern only, then we will follow our policy for managing low level concerns.

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

A 'case manager' will lead any investigation. This will be the Head of School, or the chair of governors where the Head of School is the subject of the allegation.

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

General considerations relating to allegations against staff

Persons to be notified

The case manager must inform the local authority designated officer (LADO) within 1 working day when an allegation is made and prior to any further investigation taking place.

We will follow advice from the LADO, the police and / or Children's Social Care about how much information should be disclosed to the accused person.

Subject to restrictions on the information that can be shared, the case manager will, as soon as possible after speaking to the LADO, inform the accused person about the nature of the allegation, how enquiries will be conducted and the possible outcome (e.g. disciplinary action, and dismissal or referral to the DBS or regulatory body). The case manager will only share information that has been agreed with the LADO, the police and / or Children's Social Care.

The accused member of staff will:

- › Be treated fairly and honestly and helped to understand the concerns expressed and processes involved;

- › Be kept informed of the progress and outcome of any investigation and the implications for any disciplinary or related process;
- › If suspended, be kept up to date about events in the workplace.

The LADO will advise the case manager whether or not informing the parents of the child/ren involved will impede the disciplinary or investigative processes. Acting on this advice, if it is agreed that the information can be fully or partially shared, we will inform the parent/s. The parents or carers will also be informed 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.

In some circumstances, however, the parent/s may need to be told straight away (e.g. if a child is injured and requires medical treatment).

The parent/s and the child, if sufficiently mature, will be helped to understand the processes involved and be kept informed about the progress of the case (only in relation to their child – no information will be shared regarding the staff member) and of the outcome where there is no criminal prosecution. This will include the outcome of any disciplinary process, but not the deliberations of, or the information used in, a hearing.

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

Confidentiality

Every effort should be made to maintain confidentiality and guard against publicity while an allegation is being investigated or considered. Apart from keeping the child, parents and accused person (where this would not place the child at further risk) up to date with progress of the case, information should be restricted to those who have a need to know, in order to protect children, facilitate enquiries or manage related disciplinary or suitability processes.

The case manager will take advice from the LADO, 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

Support

We will, together with Children's Social Care and / or police, where they are involved, consider the impact on the child concerned and provide support as appropriate to ensure that the child's needs are addressed.

We will 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. We will always signpost the individual to the SAS wellbeing service, the employee assistance programme that we buy into, which includes access to a block of counselling sessions. We will manage and minimize the stress caused by the allegation as much as possible.

As soon as possible after an allegation has been received, the accused member of staff will be advised to contact their union or professional association.

Suspension

Suspension is a neutral act and it will not be the default position. It 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 the allegation warrants investigation by the police or there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

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

If in doubt, the case manager will seek views from HR and the LADO, as well as the police and children's social care where they have been involved. Only the employer, however, has the power to suspend an accused employee and they cannot be required to do so by a local authority or police.

If a suspended person is to return to work, we will consider what help and support might be appropriate (e.g. a phased return to work and/or provision of a mentor), and also how best to manage the member of staff's contact with the child concerned, if still in the workplace.

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.

Resignation

Investigations will continue to reach a conclusion in all cases even if:

- › The individual leaves, resigns or ceases to provide their services
- › The individual refuses to cooperate, having been given a full opportunity to answer the allegation and make representations;
- › It may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete.

Compromise agreements' will not be used (i.e. where a member of staff agrees to resign provided that disciplinary action is not taken and that a future reference is agreed) where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children.

Whistleblowing

All staff are made aware of our whistleblowing policy. If a member of staff believes that a reported allegation or concern is not being dealt with appropriately by their organisation, they should report the matter to the LADO.

Timescales

It is in everyone's interest for cases to be dealt with expeditiously, fairly, and thoroughly and for unnecessary delays to be avoided. The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. We will endeavour to comply with the following timescales, where reasonably practicable:

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

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

Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

An allegation against a member of staff may arise from a number of sources (e.g. a report from a child, a concern raised by another adult in the organisation, or a complaint by a parent). It may also arise in the context of the member of staff and their life outside work or at home.

Initial action by person receiving or identifying an allegation

The person to whom an allegation or concern is first reported should treat the matter seriously and keep an open mind.

They should not:

- › Investigate or ask leading questions if seeking clarification;
- › Make assumptions or offer alternative explanations;
- › Promise confidentiality, but give assurance that the information will only be shared on a 'need to know' basis.

They should:

- › Make a written record of the information (where possible in the child / adult's own words), including the time, date and place of incident/s, persons present and what was said;
- › Sign and date the written record;
- › Immediately report the matter to the Head of School who will become the case manager, or the Executive Headteacher or Deputy Headteacher in their absence or; where the Head of School or Executive Headteacher is the subject of the allegation, report to the Chair of Governors.

Initial action by the case manager

When informed of an allegation, the case manager will not investigate the matter or interview the member of staff, child concerned or potential witnesses.

They will:

- › Obtain written details of the concern / allegation, signed and dated by the person receiving (not the child / adult making the allegation);
- › Approve and date the written details;
- › Record any information about times, dates and location of incident/s and names of any potential witnesses.

Record any decisions made, and the reasons for those decisions.

The case manager will report the allegation to the LADO (Tel: 01908 254307/E-mail: LADO@milton-keynes.gov.uk) within 1 working day. Referrals should not be delayed in order to gather information and a failure to report an allegation or concern in accordance with procedures is a potential disciplinary matter.

If an allegation requires immediate attention, but is received outside normal office hours, the case manager will consult the Children's Social Care emergency duty team or local police and inform the LADO as soon as possible.

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

Discussion with the LADO

The case manager will discuss the allegation with the LADO. The discussion will consider the nature, content and context of the allegation and the threshold criteria. There are up to three strands in the consideration of an allegation:

- › A police investigation of a possible criminal offence;
- › Children's Social Care enquiries and/or assessment about whether a child is in need of protection or services;
- › Consideration by an employer of disciplinary action.

The LADO and the case manager will consider first whether further details are needed and whether there is evidence or information that establishes that the allegation is false.

If the allegation is not demonstrably false and there is cause to suspect that a child is suffering or is likely to suffer significant harm, the LADO will refer to Children's Social Care and ask them to convene an immediate strategy meeting / discussion. Further information on these can be found here:

<https://miltonkeynesscp.trixonline.co.uk/chapter/allegations-against-staff-or-volunteers#strategy-meeting-discussion>

Where the police are involved, wherever possible the school 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.

Where it is clear that an investigation by the police or local authority children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

Disciplinary process

The LADO and the case manager should discuss whether disciplinary action is appropriate in all cases where:

- › It is clear at the outset or decided by a strategy meeting/discussion that a police investigation or LA Children's Social Care enquiry is not necessary; or
- › The employer or LADO is informed by the police or the Crown Prosecution Service that a criminal investigation and any subsequent trial is complete, or that an investigation is to be closed without charge, or a prosecution discontinued.

The discussion should consider any potential misconduct or gross misconduct on the part of the member of staff, and take into account:

- › Information provided by the police and/or Children's Social Care;
- › The result of any investigation or trial;
- › The different standard of proof in disciplinary and criminal proceedings.

In the case of supply, contract and volunteer workers, normal disciplinary procedures may not apply. In these circumstances, the LADO and employer should act jointly with the providing agency, if any, in deciding whether to continue to use the person's services, or provide future work with children, and if not, whether to make a report for consideration of barring or other action.

If formal disciplinary action is not required, the employer should institute appropriate action within 3 working days. See the informal process section of the Disciplinary policy.

If a disciplinary hearing is required, and further investigation is not required, it should be held within 15 working days.

If further investigation is needed to decide upon disciplinary action, the case manager and the LADO should discuss whether the school has appropriate resources or whether the employer should commission an independent investigation because of the nature and/or complexity of the case and in order to ensure objectivity. The investigation should not be conducted by a relative or friend of the member of staff.

The aim of an investigation is to obtain, as far as possible, a fair, balanced and accurate record in order to consider the appropriateness of disciplinary action and/or the individual's suitability to work with children. Its purpose is not to prove or disprove the allegation.

If, at any stage, new information emerges that requires a child protection referral, the investigation should be held in abeyance and only resumed if agreed with LA Children's Social Care and the police. Consideration should again be given as to whether suspension is appropriate in light of the new information.

The investigating officer should aim to provide a report within 10 working days.

On receipt of the report, the case manager should decide, within 2 working days, whether a disciplinary hearing is needed. If a hearing is required, it should be held within 15 working days.

In all instances where a disciplinary process is required, advice will be sought from HR. HR will provide detailed guidance to the investigating officer.

See the Disciplinary policy for further information.

Additional considerations for supply teachers and all contracted staff

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

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

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

Specific actions

No further action following initial discussion with the LADO

The case manager will 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, what information should be recorded on their personnel file 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 following initial discussion with the LADO, the case manager will 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

If immediate suspension is considered necessary, the case manager will 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

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required – this is a legal requirement. A referral should be submitted within one month of the allegation being substantiated.

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

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

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

Record-keeping

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

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

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

- A clear and comprehensive summary of the allegation

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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

Non-recent allegations

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

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

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

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff
- › Disclosure made by a child, parent or other adult within or outside the school

- › Pre-employment vetting checks

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

Definition of low-level concerns

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

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

See our Low Level concerns policy for how these should be shared and responded to.

Appendix 4: specific safeguarding issues

Children who are absent from education

A child who is absent 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 be absent 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
- › Come from new migrant families

We will follow our procedures for unauthorised absence (see our Attendance policy), and for dealing with children who are absent 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, and adhering 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. The local procedures we follow for children missing education are found [here](#).

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 frequently absent, such as travelling to conflict zones, FGM and forced marriage.

After making reasonable enquiries, if a staff member suspects that a child is suffering from harm or neglect, we will follow our procedures stated in section 7 of this policy. 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, which can be found [here](#). The [Milton Keynes Child Exploitation tool](#) will be completed, which includes a flow chart of what actions to take next. A referral to the local authority's children's social care team and the police will be made, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual 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, which can be found [here](#). The [Milton Keynes Child Exploitation tool](#) will be completed, which includes a flow chart of what actions to take next. A referral to the local authority's children's social care team and the police will be made, if appropriate.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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

- › Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- › Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- › Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- › Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- › Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- › Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- › Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- › Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- › Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

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.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

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 DSL (usually the designated safeguarding lead) before the child or children arrive at school the following day through [Operation Encompass](#). 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 her support team 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, which can be found [here](#).

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/carers 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

The minimum age of marriage in the UK is now 18 years old. It is illegal to cause a child under the age of 18 to marry even if violence, threats or coercion are not used.

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 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 fmua@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, or designated Prevent lead, will undertake in-depth Prevent awareness training, including on extremist and terrorist ideologies.** They'll make sure that staff have access to appropriate training to equip them to identify children at risk.

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 [Educate Against Hate](#) and charity [NSPCC](#) 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 staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- › Between 2 children of any age and sex
- › Through a group of children sexually assaulting or sexually harassing a single child or group of children
- › Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that

they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- › Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- › Regularly review decisions and actions, and update policies with lessons learnt
- › Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- › Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- › Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- › Challenging inappropriate behaviours
- › Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- › Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- › Increased absence from school
- › Change in friendships or relationships with older individuals or groups
- › Significant decline in performance
- › Signs of self-harm or a significant change in wellbeing
- › Signs of assault or unexplained injuries
- › Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- › Being male
- › Having been frequently absent or permanently excluded from school
- › Having experienced child maltreatment
- › Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

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 in using the electronic sign in system 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 appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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.

Non-collection of children

If a child is not collected at the end of the session/day, our procedures are:

- The child is taken to the learning mentor lounge by their class teacher. A familiar adult will remain with younger children where possible
- The learning mentors attempt to make contact with the parent/carer of the child using each of the emergency contacts we have. They will send a text message to the priority contacts if no contact can be made.
- The child will be reassured and placed in after school club if the parent confirms they will be later than 3.40pm or if no contact can be made. If they are reluctant to go, we will give them the option of remaining in the learning mentor lounge instead.
- If contact cannot be made, then the Head of School will be notified and contact will be made with MASH and advice sought.

Missing pupils

If a child does not arrive at school and the family have not been in contact to provide a reason, we will:

- Contact the parent(s) by telephone
- If school is unable to make contact, then a text message and/or email will be sent to the parents/carers asking for them to make contact within an hour timeframe
- If no contact is made, then a home welfare check will be scheduled to take place by day 2 at the latest. DSLs will make a decision depending on previous levels of need and decide whether immediate escalation to MASH is necessary.
- The home welfare check will be carried out by two members of staff.
- If there is no answer at the property, then a note will be posted through the door asking for contact to be made immediately with school.
- A call to the MASH team will be made and advice sought.