

**Safeguarding & Child Protection Policy  
for Schools & Educational Settings  
& Providers of Education Services  
for Children  
September 2022**

**St. Paul's Community Development Trust**



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<b>Signed by the Governing Body:</b>	<i>Amy Lassman</i>
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## Safeguarding & Child Protection Policy for Schools, Education Settings & Education Services

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## Part One: Safeguarding Policy

### 1.0 Introduction

Safeguarding and promoting the welfare of children is defined as:

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

Children includes everyone under the age of 18.

*This means that our organisation is committed to safeguarding and promoting the welfare of all its children. We believe that:*

- *Our children have the right to be protected from harm, abuse and neglect*
- *Our children have the right to experience their optimum mental and physical health*
- *That every child has the right to an education and children need to be safe and to feel safe in school*
- *children need support that matches their individual needs, including those who may have experienced abuse*
- *Our children have the right to express their views, feelings and wishes and voice their own values and beliefs*
- *Our children should be encouraged to respect each other's values and support each other*
- *Our children have the right to be supported to meet their emotional, social and mental health needs as well as their educational needs. Our school will ensure clear systems and processes are in place to enable identification of these needs. Including consideration of when mental health needs may become a safeguarding need.*
- *Our school will contribute to the prevention of abuse, risk/involvement in serious violent crime, victimisation, bullying (including homophobic, biphobic, transphobic and cyber bullying), exploitation, extreme behaviours, discriminatory views and risk-taking behaviours*

*All staff and visitors have an important role to play in safeguarding children and protecting them from abuse and considering when mental health may become a safeguarding issue.*

Our organisation will fulfil their local and national responsibilities as laid out in the following documents:

- *The most recent version of **Working Together to Safeguard Children** (DfE)*

*In our organisation the following people will take the lead in these areas:*

*Our Data Protection officer is:*  
**Matt Humpage**

*Our Rights Respecting link is:*

- The most recent version of **Keeping Children Safe in Education**: Statutory guidance for schools and colleges (DfE Sept 2022)
- **<https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>**
- **West Midlands Safeguarding Children Procedures**
- **The Education Act 2002 s175**
- **<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>**
- **<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>**
- Gov.uk Guidance  
**Sharing nudes and semi-nudes: how to respond to an incident** December 2020
- **General Data Protection Legislation (2018)**
- **Mental Health & Behaviour in Schools**
- **Birmingham Criminal Exploitation & Gang Affiliation Practice Guidance (2018)**
- Birmingham Safeguarding Children Partnership threshold guidance **Right Help Right Time**
- **Multi-agency Statutory Guidance on Female Genital Mutilation, April 2016, HM Government**
- **Protecting Children from Radicalisation: The Prevent Duty, 2015**
- **Relationships education, relationships and sex education (RSE) and health education**
- **Voyeurism offences act 2019**
- **Children missing from education**

**Sonia Cuthbertson**

Our lead for Mental Health is:  
**Chevourne Whittaker**  
**Henna Bangor**

Our Safeguarding Trustee is:  
**Amy Lassman**

## 2.0 Overall aims

This policy will contribute to the protection and safeguarding of our children and promote their welfare by:

- Clarifying standards of behaviour for staff and children
- Contributing to the establishment of a safe, resilient and robust ethos in the Trust, built on mutual respect and shared values;
- Introducing appropriate work within the school curriculum;
- Encouraging children and parents to participate;
- Alerting staff to the signs and indicators that all may not be well;
- Developing staff awareness of the causes of abuse;
- Developing staff awareness of the risks and vulnerabilities their children face;
- Addressing concerns at the earliest possible stage;
- Reducing the potential risks children face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation;
- Recognising risk and supporting online safety for pupils, including in the home.

*This means that in our organisation we will:*

- *Identify and protect all children especially those identified as vulnerable*
- *Identify individual needs as early as possible; and*
- *Design plans to address those needs*
- *Work in partnership with children, parents/carers and other agencies.*

*Our policy extends to any establishment the Trust commissions to deliver education to our children on our behalf including alternative provision settings.*

*Our Trustees & Governing Body will ensure that any commissioned agency will reflect the values, philosophy and standards of our organisation. Confirmation should be sought from the Trust that appropriate risk assessments are completed, and ongoing monitoring is undertaken.*

### 3.0 Guiding Principles

These are the seven guiding principles of safeguarding, as stated by Birmingham Safeguarding Children Partnership (found in **Right Help Right Time**);

- Have conversations and listen to children and their families as **early** as possible.
- Understand the child's lived experience.
- Work **collaboratively** to improve children's life experience.
- Be **open**, honest and transparent with families in our approach.
- **Empower** families by working with them.
- Work in a way that builds on the families' **strengths**.
- Build **resilience** in families to overcome difficulties.

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

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

*This means that in our organisation all staff will be aware of the guidance issued by Birmingham Safeguarding Children Partnership **Right Help Right Time**, and procedures for **Early Help**.*

*All staff will be enabled to listen and understand the lived experience of children and young people by facilitating solution focused conversations appropriate to the child/young person's preferred communication style.*

*Staff will be familiar with **The Signs of Safety & Well-Being** toolkit to have conversations with children so that their voice is heard.*

#### 4.0 Expectations

All staff and visitors will:

- Be familiar with this Safeguarding & Child Protection Policy;
- Understand their role in relation to safeguarding;
- Be alert to signs and indicators of possible abuse (See Appendix 1 for current definitions and indicators);
- Record concerns and give the record to the DSL, or deputy DSL, and;
- Deal with a disclosure of abuse from a child in line with the guidance in Appendix 2 - you must inform the DSL immediately, and provide a written account as soon as possible;
- Be involved, where appropriate, in the implementation of individual interventions, Early Help Assessments and Our Family Plans, Child in Need Plans and inter-agency Child Protection Plans.

*This means that in our organisation:*

*All our staff will receive annual safeguarding training and update briefings as appropriate. Key staff will undertake more specialist safeguarding training as agreed by the governing body.*

*In recognition of the impact of COVID-19, additional disclosure training will be undertaken by all staff.*

*Our Trustees & Governors will be subjected to an enhanced DBS check and 'Section 128' check.*

*We will follow Safer Recruitment processes and checks for all staff.*

#### 5.0 The Designated Safeguarding Lead (DSL)

- The Senior DSLs will be senior members of staff from across all departments. Whilst the activities of the DSL can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with the Senior DSL. This responsibility should not be delegated.
- DSLs should help promote developmental & educational outcomes by working closely with their staff about their welfare, safeguarding and child protection concerns.
- Governing bodies should ensure that the DSL role is explicit in the role-holder's job description and appropriate time is made available to the DSL and deputy DSL(s) to allow them to undertake their duties.

*This means the DSL team in our organisation will be:*

*Lead for school: **Kerenza Palmer and Sarah Hyde***

*Well-Being & Out of School Services: **Anita Moore***

*Nursery: **Tracey Newton***

*Children's Centre: **Carol Ferron-Smith, Sayma Bibi, Fuazia Azad***

*Deputies: **Fatima Khanum, Cheavourne Whittaker, Sharon Healey, Amber Osborne, Zara Shafiq, Henna Bangor***

*Any steps taken to support a child/ young person who has a safeguarding vulnerability must be reported to the lead DSL.*

*Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to support an individual child and/or family. A written record will be made of what information has been shared, with whom, and when.*

- Safeguarding and child protection information will be dealt with in a confidential manner.
- Our organisation will be clear as to who has parental responsibility for children on our roll, and report all identified private fostering arrangements to the Local Authority.
- In our settings the safeguarding records will be stored securely in a central place separate from academic records. Individual files will be kept for each child. Files will be kept for at least the period during which the child is attending the services, and beyond that in line with current data legislation and guidance.

*In our school we use 'School Pod' and store our records electronically we do not hold paper files.*

*The nursery & OSC hold paper files.*

*The children's centre uses Rio and records any new concerns on a central data base along with the nursery and Venture.*

***We will not disclose to a parent any information held on a child/young***



<ul style="list-style-type: none"> <li>• If a pupil moves from our school and nursery, child protection and safeguarding records will be forwarded on to the DSL at the new school or nursery, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two settings may be necessary.</li> <li>• All in-year applications and transfers will also be reported to the Local Authority.</li> <li>• Our childcare services will keep paper files securely in line with Local Authority guidance.</li> <li>• Safeguarding information will be transferred securely and signed for by the primary schools receiving the child.</li> </ul>	<p><b>person if this would put the child at risk of significant harm</b></p> <p><i>We will record where and to whom the records have been passed and the date. This will allow the new setting to continue supporting victims of abuse and have that support in place for when the child arrives.</i></p>
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<p><b>6.0 Contextual Safeguarding</b></p> <ul style="list-style-type: none"> <li>• KCSiE writes about the importance of the context in which school safeguarding must be considered, including behaviours that are associated with factors outside the school which can occur between children outside of these environments</li> <li>• Contextual Safeguarding is an approach to understanding, and responding to, young people’s experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.</li> </ul>	<p><i>In our organisation our DSLs will consider contextual safeguarding in their early working of safeguarding processes and give due regard to the effectiveness of our safeguarding system and the wider system in which the child operates. This will be evidenced in:</i></p> <ul style="list-style-type: none"> <li>• <i>Informal and formal assessments of need/ risk for the child;</i></li> <li>• <i>Case discussions in DSL supervision sessions.</i></li> </ul>
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<p><b>7.0 Mental Health</b></p> <ul style="list-style-type: none"> <li>• All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.</li> <li>• Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children’s experiences, can impact on their mental health, behaviour and education.</li> </ul>	<p><i>In our organisation this means that:</i></p> <ul style="list-style-type: none"> <li>• <i>All staff will take immediate action and speak to a DSL if they have a mental health concern about a child.</i></li> <li>• <i>The children in our settings will have staff that that they know they can talk to about their feelings.</i></li> <li>• <i>Staff will promote positive health, wellbeing and resilience among young people including following the guidance <b><u>Promoting children and young people’s emotional health and wellbeing</u></b></i></li> </ul>
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## 8.0 The Designated Teacher for Looked After and Previously Looked After Children

- The governing body must appoint a designated teacher (in non-maintained schools and colleges an appropriately trained teacher should take the lead) and should work with local authorities to promote the educational achievement of registered pupils who are looked after. On commencement of sections 4-6 of the Children and Social Work Act 2017, our designated teachers will have responsibility for promoting the educational achievement of children/ young people who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.
- Birmingham Children's Trust has ongoing responsibilities to the young people who cease to be looked after and become care leavers. That includes keeping in touch with them, preparing an assessment of their needs and appointing a personal adviser who develops a pathway plan with the young person. This plan describes how Birmingham Children's Trust will support the care leaver to participate in education or training.

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

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

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

*In our school the Designated Teacher is:  
Name: **Sarah Hyde***

*Our Designated Teacher will:*

- *Work with the Virtual school to provide the most appropriate support utilising the pupil premium plus to ensure they meet the needs identified in the child's personal education plan.*
- *Work with the virtual school head to promote the educational achievement of previously looked after children. In other schools and colleges, an appropriately trained teacher should take the lead.*

*Our DSLs will keep the details of the Birmingham Children's Trust Personal Advisor appointed to guide and support the care leaver and will liaise with them as necessary regarding any issues of concern affecting the care leaver.*

*In our organisation this means that:*

*Staff will promote children's well-being welfare, and ensure absences and changes in behaviour are followed up. Staff will support educationally and emotionally.*

*DSL's will attend multi agency meetings and compile reports as required.*

## 9.0 The governing body

Governing bodies and proprietors should ensure that there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare:

- The Trust operates "Safer Recruitment" procedures and ensures that appropriate checks are carried out on all new staff and relevant volunteers (including members of the governing body);
- The leadership team and all other staff who work with children undertake safeguarding training on an annual basis with additional updates as necessary within a 2-year framework and a training record maintained;
- Temporary staff and volunteers are made aware of the Trust's arrangements for safeguarding & child protection and their responsibilities;
- The settings' remedies any deficiencies or weaknesses brought to its attention without delay;
- The governing body has a written policy and procedures for dealing with allegations of abuse against members of staff, visitors, volunteers or governors that complies with all BSCP procedures;
- The Nominated Governor is responsible for liaising with the Head Teacher and Lead DSL over all matters regarding safeguarding and child protection issues. The role is strategic rather than operational – they will not be involved in concerns about individual children.

*In our school this means that:*

*Our Trustees and school governors will attend Child Protection Training as part of their induction and undertake refresher training every 2 years.*

*All governors and Trustees must have read part 2 of "KCSIE" and completed the update training each September.*

*Our nominated school governor for safeguarding and child protection is:  
Name: **Natasha Streeter**  
Our nominated Trustee is: **Amy Lassman***

*This governor will receive safeguarding training relevant to the governance role and this will be updated every 2 years.*

*The governing body and Board of Trustees will review all policies/procedures that relate to safeguarding and child protection annually.*

*A member of our governing body (usually the Chair) is nominated to be responsible for liaising with Birmingham Children's Trust in the event of allegations of abuse being made against the Head Teacher and or the CEO.*

*The Nominated Governor will liaise with the Head Teacher and the Lead DSL to produce a report at least annually for governors and ensure the annual Section 175 safeguarding self-assessment is completed and submitted on time.*

## 10.0 Safer recruitment and selection

The Trust will pay full regard to 'Safer Recruitment' practice including scrutinising applicants, verifying identity and academic or vocational qualifications, obtaining professional and character references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job.

It also includes undertaking interviews and appropriate checks including disclosure & barring check, barred list checks and prohibition checks. Evidence of these checks will be recorded on our Single Central Record.

All recruitment materials will include reference to the Trust's commitment to safeguarding and promoting the wellbeing of pupils.

Volunteers and students will also undertake similar checks who are helping in a regulated activity capacity.

In the event of DBS checks disclosing information on an applicant the Trust will check the information against what the applicant has declared in their job application. If the information is the same the Trust will assess the case fairly. A decision not to appoint somebody because of their conviction(s) will be clearly documented, so if challenged the Trust can defend its decision, in line with our Staff Recruitment & Vetting policy.

*This means that in our organisation:*

*The following staff have undertaken Safer Recruitment training:*

- 1 Anita Moore**
- 2 Kerenza Palmer**
- 3 Sayma Bibi**
- 4 Fuazia Azad**
- 5 Elaine Hanrahan**
- 6. Matt Humpage**

*One of these will be involved in all staff recruitment processes and sit on the recruitment panel.*

*And the following members of the Governing Body have also been trained:*

- 1. Patrick Wing**
- 2. Amy Lassman**

## 10.1 Induction

All staff, especially staff who have been redeployed, must be aware of systems within their setting which support safeguarding, and these should be explained to them as part of staff induction.

## 10.2 Staff support

DSLs should be given additional time, particularly in the autumn term, to support staff and children regarding new safeguarding and welfare concerns. Regular safeguarding supervision will be offered to the Senior DSLs, safeguarding supervision may need to be offered to other members of staff as deemed appropriate by the setting. DSLs will be supported to access training as appropriate including training in behaviour and mental health.

*Our staff induction process will cover:*

- *The Safeguarding & Child Protection policy;*
- *The Behaviour Policy;*
- *The Staff Code of Conduct;*
- *The safeguarding response to children who go missing from education; and*
- *The role of the DSL (including the identity of the DSL and any deputies).*

*Copies of policies and a copy of Part one of the KCSIE-22 document is provided to staff at induction.*

*We recognise the importance of practice oversight and multiple perspectives in safeguarding and child protection work. We will support staff by providing opportunities for reflective practice including opportunity to talk through all aspects of safeguarding work within education with the DSL and to seek further support as appropriate.*

## 11.0 The use of reasonable force

There are circumstances when it is appropriate for staff in our settings to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involves a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to prevent violence or injury.

'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

*This means in our school:*

*By planning positive and proactive behaviour support, the occurrence of challenging behaviour and the need to use reasonable force will reduce.*

*We will write pupil handling and behaviour plans for our 'more vulnerable children and agree them with parents and carers.*

*We will not have a 'no contact' policy as this could leave our staff unable to fully support and protect their pupils.*

*When using reasonable force in response to risks presented by incidents involving **children** including any with SEN or disabilities, or with medical conditions, our staff will consider the risks carefully.*

*All staff who would be in a position to use reasonable force are 'team teach' trained and understand that reasonable force must only be used in the event that:*

- *A pupil is at risk harm from themselves or their peers*
- *The school environment is going to get damaged causing considerable risk to the pupil (s).*

## 12.0 The Trust's role in the prevention of abuse

This Safeguarding & Child Protection Policy cannot be separated from the general ethos of the organisation, which should ensure that children are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

Safeguarding issues, including online safety will be addressed through all areas of the curriculum including extra familial harm (multiple harms)

*This means that in our organisation:*

*All staff will be made aware of our unauthorised absence and children missing from education procedures.*

*We will provide opportunities for children to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.*

*All our policies which address issues of power and potential harm, for example Anti-Bullying, Discrimination, Equal Opportunities, Handling, Positive Behaviour, will be inter-linked to ensure a whole 'school' approach.*

*We also recognise the particular vulnerability of children who have a social worker.*

### 13.0 What we will do when we are concerned – Early Help response

Where unmet needs have been identified for a child utilising the **Right Help Right Time** (RHRT) model but there is no evidence of a significant risk, the DSL will oversee the delivery of an appropriate Early Help response.

The child/young person`s voice must remain paramount within a solution focused practice framework.

The primary assessment document is the 2020 Early Help Assessment (EHA).

Should it be felt that a Think Family or social care response is needed to meet the unmet safeguarding need, the DSL will initiate a Request for Support, seeking advice from Children`s Advice and Support Service (CASS) as required.

The DSL will then oversee the agreed intervention as part of the multiagency safeguarding response and ongoing support.

*This means that in our organisation we will: implement **Right Help Right Time***

*All Staff will notice and listen to children and young people, sharing their concerns with the DSL in writing.*

*Safeguarding leads will assess, plan, do and review plans.*

*Senior leaders will analyse safeguarding data and practice to inform strategic planning and staff CDP.*

*The DSL will generally lead on liaising with other agencies and setting up the Our Family Plan. This multi-agency plan will then be reviewed regularly, and progress updated towards the goals until the unmet safeguarding needs have been addressed.*

*In our organisation although any member of staff can refer a situation to CASS, it is expected that the majority are passed through the DSL team.*

#### **14.0 Safeguarding students who are vulnerable to radicalisation**

With effect from 1<sup>st</sup> July 2015, all schools are subject to a duty to have “due regard to the need to prevent people being drawn into terrorism” (section 26, Counter Terrorism and Security Act 2015). This is known as The Prevent Duty.

The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation.

Definitions of radicalisation, terrorism and extremism, and indicators of vulnerability to radicalisation are in Appendix 4.

*This means that our organisation:*

*Values freedom of speech and the expression of beliefs and ideology as fundamental rights underpinning our society’s values. children and staff have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.*

## 14.1 Risk reduction

The Trust's leadership team, school governors and the Senior DSLs will assess the level of risk within the Trust and put actions in place to reduce that risk. Risk assessment may include consideration of the school's curriculum, the Trust's SEND policies, the use of Trust's premises by external agencies, integration of children by gender and SEN, anti-bullying policy and other issues specific to the Trust's values, community and philosophy. To this end, open source due diligence checks will be undertaken on all external speakers invited to our organisation and childcare settings.

The setting is required to identify a Prevent Single Point of Contact (SPOC) who will be the lead within the organisation for safeguarding in relation to protecting individuals from radicalisation and involvement in terrorism: this will normally be the DSL. The responsibilities of the SPOC are described in Appendix 5

The Trust will monitor online activity within the school to ensure that inappropriate sites are not accessed by children or staff.

The Trust has a duty to cooperate with the Channel programme in the carrying out of its functions, and with the Police in providing information about an individual who is referred to Channel (Section 38, Counter Terrorism and Security Act 2015).

Within other settings across the Trust staff will have the same awareness training about Prevent and follow the same procedures as the school. We are aware that younger children and vulnerable adults can also be drawn into radicalisation.

## 14.2 Channel

Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to:

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

Further guidance about duties relating to the risk of radicalisation is available in the Advice for Schools on **The Prevent Duty**.

*We are clear that this exploitation and radicalisation must be viewed as a safeguarding concern and that protecting children from the risk of radicalisation from any group (including, but not restricted to, those linked to Islamist ideology, or to Far Right/Neo-Nazi/White Supremacist, Domestic Terrorism, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements) is part of our organisations' safeguarding duty.*

*The SPOC for our school is:  
Name: Kerenza Palmer*

*All staff within our organisation will be alert to changes in a child's behaviour or attitude which could indicate that they are in need of help or protection.*

*We will use specialist online monitoring software, which in this school is called 'Smoothwall Web Filter and Self Service Monitor'*

*Our organisation will make referrals to Channel if we are concerned that an individual might be vulnerable to radicalisation.*



## **15.0 Pupils/students who are vulnerable to exploitation, trafficking, or so-called ‘honour-based’ abuse (including female genital mutilation and forced marriage)**

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

With effect from October 2015, all schools are subject to a mandatory reporting requirement in respect of female genital mutilation (FGM). When a staff member suspects or discovers that an act of FGM is going to be or has been carried out on a girl aged under 18, they have a statutory duty to report it to the Police.

Failure to report such cases will result in disciplinary sanctions.

The staff member will also discuss the situation with the DSL who will consult Birmingham Children’s Trust before a decision is made as to whether the mandatory reporting duty applies.

This will also apply to all other staff working within the Children’s Centre and Childcare settings.

*This means that in our organisation we ensure:*

*Our staff are supported to talk to families and local communities about sensitive concerns in relation to their children and to find ways to address them together wherever possible.*

*All staff are up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation around;*

- *Forced marriage*
- *FGM*
- *Honour based abuse*
- *Trafficking*
- *Criminal exploitation and gang affiliation*

*Our staff will be supported to recognise warning signs and symptoms in relation to each specific issue, and include such issues, in an age appropriate way, in their lesson plans.*

## 16.0 Children missing from education

A child going missing and or patterns of unauthorised absence, particularly repeatedly, can act as a vital warning sign of a range of safeguarding risks, including abuse and neglect, which may include sexual abuse or exploitation; child criminal exploitation; mental health problems; substance abuse and other issues. Early intervention is necessary to identify the existence of any underlying safeguarding risks and to help prevent the risk of them going missing in future.

Work around attendance and children missing from education will be coordinated with safeguarding interventions.

The school must notify the Local Authority of any pupil/student who has been absent without the school's permission for a continuous period of 5 days or more after making reasonable enquiries

The school (regardless of designation) must also notify the Local Authority of any pupil/student who is to be deleted from the admission register under any of the prescribed regulations outlined in the Education (Pupil Registration) (England) Regulations 2016 amendments

Within our Early Year's settings staff will follow up any absences within 24 hours. Where a child has been missing for 2 week's we are required to report the absence to the Early Years Duty Team. This is regardless of whether or not we are aware of the reason for their absence.

*This means that in our organisation we will:*

*Hold two or more emergency contact numbers for each pupil.*

*All our attendance work will liaise closely with the DSL.*

*We will adapt our attendance monitoring on an individual basis to ensure the safety of each child at our school and childcare settings.*

*Our senior staff will demonstrate that we have taken reasonable enquiries to ascertain the whereabouts of children that would be considered 'missing'.*

*We will work closely with the CME Team, School Admissions Service, Education Legal Intervention Team and the Elective Home Education Team*

## 17.0 Child on child abuse

Children can abuse other children and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); financial abuse including criminal coercion, theft, extortion and abuse surrounding personal belongings; abuse within intimate and non-intimate relationships including coercive control; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; 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; 'upskirting' and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

### 17.1 Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. 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 development & educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same setting. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

Staff should recognise the impact of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence this policy is referring to sexual offences under the Sexual Offences Act 2003 as described below:

- **Rape:** A person (A) commits an offence of rape if: there is intentional penetration of the vagina, anus or mouth of another person (B) with his penis, (B) does not consent to the penetration and (A) does not reasonably believe that (B) consents.

*This means that in our organisation:*

*All staff will be made aware of the types and effects of child on child abuse. We will recognise that child on child abuse can occur between and across different age ranges.*

*Staff will be aware that children may not be ready or feel that they can tell someone about the abused or even realise that what they are experiencing is actually abuse and so staff will exercise professional curiosity and speak to a DSL about any concerns that they have about a child.*

*Staff within their own departments will know the best ways to communicate with their pupils/children in order to create a safe environment and trust in order to enable children to speak out.*

*Staff will be aware that some groups are potentially more at risk: Girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk for example.*

*Staff will also consider the wider contexts surrounding child on child abuse such as the children's home environments, online activity, changes in family dynamics etc as children who abuse others are generally experiencing abuse themselves or post-traumatic stress from adverse childhood experiences. With these considerations it means all children involved will be considered at risk.*

*We recognise that sexual harassment can be online and offline and can include sexual comments and remarks, 'jokes', taunting, physical behaviours and consensual and non-consensual sharing of nude & semi-nude images. As a preventative measure we will adopt the 'whole school approach' to tackling sexism. We will not pass it off as "banter", "just having a laugh" or "part of growing up".*

*We will follow the guidance on managing reports of child-on-child sexual violence and sexual harassment in schools.*

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

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

## 17.2 Children who are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse.

*We will utilise the **Children who pose a Risk to Children School Safety Plan** produced by the local authority*

*Our DSL will follow **local guidance** to enable provision of effective support to any child affected by this type of abuse*

*We fully understand that even if there are no reports of child on child abuse in our settings it may be happening. As such all our staff and children are supported to:*

- *be alert to child on child abuse (including sexual harassment);*
- *understand how the school and child care settings view and respond to child on child abuse*
- *stay safe and be confident that reports of such abuse will be taken seriously and a victim will not ever be made to feel ashamed for making a report*

*This means that in our organisation:*

*Staff will ensure pupils within our settings know that they can approach staff and will be listened to in a safe space in order to share their concerns and be supported.*

*Staff across the Trust will not discriminate any child who is LGBT within our settings and will deal with any issues of discrimination and or bullying in accordance with our behaviour and anti-bullying policies.*

## 18.0 Child Criminal Exploitation

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

### 18.1 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### 18.2 Modern Slavery and The National Referral Mechanism

*This means that in our organisation we will:*

*Notice and listen to children/ young people showing signs of being drawn in to anti-social or criminal behaviour, use the risk assessment screening tool to support our referrals to CASS for any children in our settings that we are concerned about.*

*Ensure staff are aware of the indicators that signal a child is at risk of **serious violence**, absence from school, changes in relationships, a decline in performance, signs of self-harm & change of wellbeing, signs of assault & unexplained gifts or new possessions. That males are more at risk.*

*Be aware of and work with the Police and local organisations to disrupt as much as possible criminal exploitation activity within our settings.*

*We will act when children are missing from education and contact families to ascertain why.*

*‘One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.’*

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK ([www.gov.uk](http://www.gov.uk))

### 18.3 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include;

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime

### 19.0 Domestic Abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse.

### 20.0 Online Safety

*If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests*

*This means that in our organisation:*

*Staff will understand that the effects of domestic can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.*

*We will listen to children and parents and notice when we see or hear signs of domestic abuse. We will refer to CASS and or work together with partner agencies who can support victims of domestic abuse.*

*Staff will also be alert to teenage relationship abuse and support victims of abuse but also acknowledge that the alleged perpetrators will also need help.*

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole Trust approach to online safety empowers us to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**Content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**Contact:** being subjected to harmful online interaction with other users; for example: 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:** online behaviour that increases the likelihood of, or causes, harm; for example, 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. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>)

*This means that in our organisation:*

*We have an Online Safety Policy and Use of Mobile Phone & Devices Policy.*

*We will use specialist online monitoring software, which in this school is called 'Smoothwall Web Filter and Self Service Monitor'*

*Our staff will be aware of the risks children face with online activity and teach children about the risks and how to respond and report concerns whilst online.*

*Ensure online safety is integrated within the school curriculum.*

*Be aware that children can use mobiles and smart technology to sexually harass, bully and control others and have mechanisms to identify, intervene in, and escalate any concerns where appropriate.*

## Part Two: Key procedures

### Responding to concerns about a child

In our **organisation**

Our Senior DSL(s) are **Kerenza Palmer, Anita Moore, Tracey Newton, Carol Ferron-Smith, Sayma Bibi & Fuazia Azad**

Our safeguarding Trustee is Amy Lassman

Our safeguarding School Governor Natasha Steeter

#### **CONCERN ABOUT A CHILD:**

Speak to Designated Safeguarding Lead (DSL) if urgent.

The school staff are to Record on School Pod

Other staff can Record in writing on Safeguarding Concerns Form and hand to a DSL

#### **DSL(s) review concerns and decide next steps**

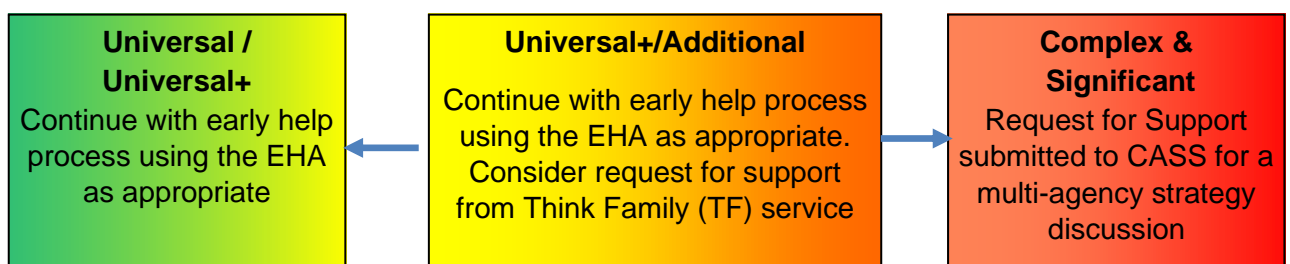
##### **referring to Right Help Right Time (RHRT)**

- Consider discussing concerns with parent / carers and seek consent where appropriate.
- Consider completing Early Help Assessment (EHA).

#### **At any point consider seeking advice:**

Children's Advice Support Service (CASS)  
0121 303 1888

In case of emergency phone police on 999





## 21.0 Involving parents/carers

21.1 In general, we will discuss any safeguarding or child protection concerns with parents/carers before approaching other schools or agencies and will seek their consent to making a referral to another agency. Appropriate staff will approach parents/carers after consultation with the DSL.

However, there may be occasions when the DSL will contact another school or agency before informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

21.2 Parents/carers will be informed about our Safeguarding & Child Protection Policy through **the school prospectus, nursery & out of school handbooks and the Trust's website.**

## 22.0 Multi-agency work

22.1 We work in partnership with other agencies in line with **Right Help Right Time** to promote the best interests of our children and keep them as a top priority in all decisions and actions that affect them. Our organisation will, where necessary, liaise with these agencies to implement or contribute to an Early Help Assessment and Our Family Plan and make requests for support from Birmingham Children's Trust. These requests will be made by the DSL to the Children's Advice and Support Service (CASS) - 0121 303 1888. Where the child already has a safeguarding social worker or family support worker, concerns around escalation of risks must be reported immediately to the social/ family support worker, or in their absence, to their team manager.

22.2 When invited the DSL will participate in a MASH strategy meeting, usually by conference phone, adding school/nursery/family-held data and intelligence to the discussion so that the best interests of the child are met.

22.3 We will co-operate with any child protection enquiries conducted by Birmingham Children's Trust: the Trust will ensure representation at appropriate inter-agency meetings such as Our Family Plan, Children in Need, Initial and Review Child Protection Conferences, and Core Group meetings.

22.4 We will provide reports as required for these meetings. If the Trust is unable to attend, a written report will be sent and shared with Birmingham Children's Trust at least 24 hours prior to the meeting.

22.5 Where a child is subject to an inter-agency Child Protection Plan or a multi-agency risk assessment conference (MARAC) meeting, the Trust will contribute to the preparation, implementation and review of the plan as appropriate.

## 23.0 Our role in supporting children

23.1 Our staff will offer appropriate support to individual children or young people who have experienced abuse, who have abused others (peer on peer abuse) or who act as Young Carers in their home situation.

23.2 An Our Family Plan will be devised, implemented and reviewed regularly for these children. This Plan will detail areas of support, who will be involved, and the child's wishes and feelings. A copy of the Plan will be kept in the child's safeguarding record.

23.3 Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the Trust community through a multi-agency risk assessment. Within our organisation we will ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

23.4 We will ensure the Trust works in partnership with parents/ carers and other agencies as appropriate.

## 24.0 Responding to an allegation about a member of staff

See also Birmingham Safeguarding Children Partnership procedures on [allegations against staff and volunteers](#).

24.1 This procedure must be used in any case in which it is alleged that a member of staff, **Governor, Trustee**, visiting professional or volunteer has:

- Behaved in a way that has harmed a child or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved in a way that indicates s/he may not be suitable to work with children.
- Behaved towards a child or children in a way that indicated s/he may pose a risk of harm to children.
- The new provision as set out in part 4 of KCSIE should apply to anyone working in the school who has behaved, or may have behaved, **in a way that indicates they may not be suitable to work with children.**

24.2 Although it is an uncomfortable thought, it needs to be acknowledged that there is the potential for staff in our organisation to abuse children. In our organisation we also recognise that concerns may be apparent before an allegation is made.

24.3 All staff working within our organisation must report any potential safeguarding concerns about an individual's behaviour towards children and young people immediately.

23.3.1 Allegations or concerns about staff, colleagues and visitors (recognising that schools hold the responsibility to fully explore concerns about supply staff) must be reported directly to the **CEO** who will liaise with the Birmingham Children's Trust Designated Officer (LADO) Team who will decide on any action required. (Where a Head Teacher is also the sole Proprietor of an Independent school it is mandatory to report to the LADO).

23.3.2 If the concern relates to the **CEO or Head Teacher in the school**, it must be reported immediately to the Chair of the Governing Body, who will liaise with the Designated Officer in Birmingham Children's Trust (LADO) and they will decide on any action required.

23.3.3 If the safeguarding concern relates to the proprietor of the setting then the concern must be made directly to the Birmingham Children's Trust Designated Officer (LADO) Team who will decide on any action required.

## 25.0 Children with additional needs

25.1 Our Organisation recognises that all children have a right to be safe. Some children may be more vulnerable to abuse, for example those with a disability or special educational need, those living with domestic violence or drug/alcohol abusing parents, etc.

25.2 When our school is considering excluding, either for a fixed term or permanently, a vulnerable pupil or one who is the subject of a Child Protection Plan, or where there is an existing child protection file, we will conduct a holistic multi-agency risk-assessment prior to making the decision to exclude. In the event of a one-off serious incident resulting in an immediate decision to exclude, the risk assessment should be completed prior to convening a meeting of the governing body.

## 26.0 Children in specific circumstances

26.1 Private Fostering

- 26.1.1 Many adults find themselves looking after someone else's child without realising that they may be involved in private fostering. A private fostering arrangement is one that is made privately (that is to say without the involvement of Birmingham Children's Trust) for the care of a child under the age of 16 (under 18, if disabled) by someone other than a parent or immediate relative. If the arrangement is to last, or has lasted, for 28 days or more, it is categorised as private fostering.
- 26.1.2 The Children Act 1989 defines an immediate relative as a grandparent, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage or civil partnership), or a step parent.
- 26.1.3 People become involved in private fostering for all kinds of reasons. Examples of private fostering include:
- Children who need alternative care because of parental illness;
  - Children whose parents cannot care for them because their work or study involves long or antisocial hours;
  - Children sent from abroad to stay with another family, usually to improve their educational opportunities;
  - Unaccompanied asylum seeking and refugee children;
  - Teenagers who stay with friends (or other non-relatives) because they have fallen out with their parents;
  - Children staying with families while attending a school away from their home area.
- 26.1.4 There is a mandatory duty on the Trust to inform Birmingham Children's Trust of a private fostering arrangement - this is done by contacting CASS (0121 303 1888). The Trust then has a duty to check that the child/young person is being properly cared for and that the arrangement is satisfactory.

## 27. Quality assurance

Quality assurance is about assessing the quality of the work we undertake in safeguarding children and understanding the impact of this work in terms of its effectiveness in helping children and young people feel safe.

- This Quality Assurance Framework is aimed at: Ensuring that data and quality assurance outputs are regularly reviewed through s.175/157 and s.11 audits across the Trust and related governance and challenge arrangements.
- Ensuring that the safeguarding data Trust generate is of good quality and contributes to a culture of continuous learning and improvement whereby key learning is embedded into practice, policies and guidance.

The BSCP has recommended that “in reviewing the safeguarding data safeguarding governors and governors should be given reports detailing the number of early help interventions in school and multi-agency early help interventions, the number of requests for support being made and the number being accepted.

*This means that in our organisation:*

*We will complete the s175/157 and S.11 audits on time, implement and review the resulting Action Plan with a view to reporting to relevant governance and challenge arrangements.*

*We will contribute quality data to inform multi-agency audits and practice reviews.*

*We will participate in activities that demonstrate the strength of partnership working and contribute our data to identify aspects that could have been better.*

*Safeguarding leads will not only assess, plan, do and review plans but also regularly audit the quality of these against the agreed quality assurance framework:*

- 1. How much did we do? (Numbers)*
- 2. How well did we do it? (Whole school; File and themed audits, partner agency, pupil/parent feedback)*
- 3. Are there opportunities to learn and improve? (Could Do Better Still;) reflective-learning case studies; local Safeguarding-Practice-Reviews, complaints; inspections)*
- 4. Is anyone better off? (Impact)*

## 28. Child Safeguarding Practice Reviews, Domestic Homicide Reviews and Lessons Learnt Reviews

We will ensure that the DSL updates all staff at least annually about the relevant outcomes and findings of local and national Child Safeguarding Practice Reviews, Domestic Homicide Reviews and Lessons Learnt Reviews.

We will collaborate with Birmingham Safeguarding Children Partnership to share information.

*This means that in our organisation:*

*Senior leaders will analyse safeguarding data and practice to ensure that all staff receive updates about the relevant outcomes and findings of local and national Child Safeguarding Practice Reviews, Domestic Homicide Reviews and Lessons Learnt Reviews at least once per year.*

*Where a case is relevant to a setting, we will ensure that we fully support Child Safeguarding Practice Reviews, Domestic Homicide Reviews and Lessons Learnt Reviews with all necessary information and implement the resulting actions and learning.*

## 29.0 Links to additional information about safeguarding issues and forms of abuse

- 29.1 Staff who work directly with children, and their leadership team should refer to this information
- 29.2 Guidance on children in specific circumstances found in Annex A of KCSIE 22, and additional resources as listed below:

Issue	Guidance	Source
Abuse	<p><a href="http://westmidlands.procedures.org.uk/pkphz/regional-safeguarding-guidance/abuse-linked-to-faith-or-belief">http://westmidlands.procedures.org.uk/pkphz/regional-safeguarding-guidance/abuse-linked-to-faith-or-belief</a></p> <p><a href="http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse">http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse</a></p> <p><a href="http://westmidlands.procedures.org.uk/pkphl/regional-safeguarding-guidance/neglect">http://westmidlands.procedures.org.uk/pkphl/regional-safeguarding-guidance/neglect</a></p> <p><a href="#"><b>Children who abuse others   West Midlands Safeguarding Children Group</b></a></p>	West Midlands Safeguarding Children Procedures
Bullying	<a href="http://westmidlands.procedures.org.uk/pkphh/regional-safeguarding-guidance/bullying#">http://westmidlands.procedures.org.uk/pkphh/regional-safeguarding-guidance/bullying#</a>	West Midlands Safeguarding Children Procedures
Children and the Courts	<p><a href="https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-5-to-11-year-olds</a></p> <p><a href="https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds">https://www.gov.uk/government/publications/young-witness-booklet-for-12-to-17-year-olds</a></p>	MoJ advice
Missing from Education, Home or Care	<p><a href="http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education">http://westmidlands.procedures.org.uk/pkpls/regional-safeguarding-guidance/children-missing-from-care-home-and-education</a></p> <p><a href="http://westmidlands.procedures.org.uk/pkotx/regional-safeguarding-guidance/children-missing-education-cme">http://westmidlands.procedures.org.uk/pkotx/regional-safeguarding-guidance/children-missing-education-cme</a></p>	West Midlands Safeguarding Children Procedures
Family Members in Prison	<a href="https://www.nicco.org.uk/">https://www.nicco.org.uk/</a>	Barnardo's in partnership with Her Majesty's Prison and Probation Service (HMPPS)
Drugs	<p><a href="http://policeandschools.org.uk/KNOWLEDGE%20BASE/Psychoactive%20Substances.html">http://policeandschools.org.uk/KNOWLEDGE%20BASE/Psychoactive%20Substances.html</a></p> <p><a href="http://policeandschools.org.uk/KNOWLEDGE%20BASE/alcohol.html">http://policeandschools.org.uk/KNOWLEDGE%20BASE/alcohol.html</a></p> <p><a href="http://westmidlands.procedures.org.uk/pkpzo/regional-safeguarding-guidance/children-of-parents-who-misuse-substances">http://westmidlands.procedures.org.uk/pkpzo/regional-safeguarding-guidance/children-of-parents-who-misuse-substances</a></p>	Birmingham Police and Schools Panels

<b>Issue</b>	<b>Guidance</b>	<b>Source</b>
Domestic Abuse	<a href="http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse">http://westmidlands.procedures.org.uk/pkost/regional-safeguarding-guidance/domestic-violence-and-abuse</a>	West Midlands Safeguarding Children Procedures
Child Exploitation	<a href="http://westmidlands.procedures.org.uk/pkpll/regional-safeguarding-guidance/child-sexual-exploitation">http://westmidlands.procedures.org.uk/pkpll/regional-safeguarding-guidance/child-sexual-exploitation</a> <a href="http://westmidlands.procedures.org.uk/pkpsx/regional-safeguarding-guidance/trafficked-children">http://westmidlands.procedures.org.uk/pkpsx/regional-safeguarding-guidance/trafficked-children</a> <b><u>Birmingham Criminal Exploitation &amp; Gang Affiliation Practice Guidance (2018)</u></b> <a href="https://www.birmingham.gov.uk/downloads/file/11545/birmingham-criminal-exploitation-and-gang-affiliation-practice-guidance-2018">https://www.birmingham.gov.uk/downloads/file/11545/birmingham-criminal-exploitation-and-gang-affiliation-practice-guidance-2018</a>	West Midlands Safeguarding Children Procedures  WMP, BCSP, BCT
Homelessness	<a href="https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets">https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets</a>	HCLG
Health & Wellbeing	<a href="http://westmidlands.procedures.org.uk/pkpht/regional-safeguarding-guidance/self-harm-and-suicidal-behaviour">http://westmidlands.procedures.org.uk/pkpht/regional-safeguarding-guidance/self-harm-and-suicidal-behaviour</a> <a href="https://www.birmingham.gov.uk/downloads/file/9462/medicine-in-schools-feb-2018">https://www.birmingham.gov.uk/downloads/file/9462/medicine-in-schools-feb-2018</a>	West Midlands Safeguarding Children Procedures  BCC Education Safeguarding
Online	<a href="https://www.birmingham.gov.uk/downloads/file/8446/sexting-flow-chart-feb-2017">https://www.birmingham.gov.uk/downloads/file/8446/sexting-flow-chart-feb-2017</a> <a href="http://policeandschools.org.uk/onewebmedia/Searching%20Screening%20&amp;%20Confiscation%20Jan%202018.pdf">http://policeandschools.org.uk/onewebmedia/Searching%20Screening%20&amp;%20Confiscation%20Jan%202018.pdf</a> <b><u>Online safety: Children exposed to abuse through digital media   West Midlands Safeguarding Children Group</u></b> <b><u>Teaching online safety in school</u></b>	BCC Education Safeguarding  Birmingham Police and Schools Panels  DfE
Private Fostering	<a href="https://www.birmingham.gov.uk/downloads/file/2792/private-fostering-in-birmingham-information-for-professionals">https://www.birmingham.gov.uk/downloads/file/2792/private-fostering-in-birmingham-information-for-professionals</a>	BCC
Radicalisation	<a href="http://westmidlands.procedures.org.uk/pkpzt/regional-safeguarding-guidance/safeguarding-children-and-young-people-against-radicalisation-and-violent-extremism">http://westmidlands.procedures.org.uk/pkpzt/regional-safeguarding-guidance/safeguarding-children-and-young-people-against-radicalisation-and-violent-extremism</a>	West Midlands Safeguarding Children Procedures
Violence	<a href="http://westmidlands.procedures.org.uk/pkplh/regional-safeguarding-guidance/sexually-active-children-and-young-people-including-under-age-sexual-activity">http://westmidlands.procedures.org.uk/pkplh/regional-safeguarding-guidance/sexually-active-children-and-young-people-including-under-age-sexual-activity</a> <a href="https://www.birmingham.gov.uk/downloads/file/8321/responding-to-hsb-school-guidance">https://www.birmingham.gov.uk/downloads/file/8321/responding-to-hsb-school-guidance</a> <a href="https://www.birmingham.gov.uk/downloads/file/9504/children-who-pose-a-risk-to-children">https://www.birmingham.gov.uk/downloads/file/9504/children-who-pose-a-risk-to-children</a>	West Midlands Safeguarding Children Procedures  BCC Education Safeguarding

Issue	Guidance	Source
	<p data-bbox="368 159 1203 226"><a href="http://policeandschools.org.uk/KNOWLEDGE%20BASE/secondary_menu.html">http://policeandschools.org.uk/KNOWLEDGE%20BASE/secondary_menu.html</a></p> <p data-bbox="368 259 1187 360"><a href="http://westmidlands.procedures.org.uk/pkpzs/regional-safeguarding-guidance/children-affected-by-gang-activity-and-youth-violence">http://westmidlands.procedures.org.uk/pkpzs/regional-safeguarding-guidance/children-affected-by-gang-activity-and-youth-violence</a></p> <p data-bbox="368 394 1187 461"><a href="https://www.gov.uk/government/policies/violence-against-women-and-girls">https://www.gov.uk/government/policies/violence-against-women-and-girls</a></p> <p data-bbox="368 495 1126 562"><a href="#">Honour-based violence   West Midlands Safeguarding Children Group</a></p>	<p data-bbox="1241 159 1406 293">Birmingham Police and Schools Panels</p>

# Appendices

## Appendix 1

### Definitions and indicators of abuse

#### 1. Neglect

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 maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- Constant hunger
- Stealing, scavenging and/or hoarding food
- Frequent tiredness or listlessness
- Frequently dirty or unkempt
- Often poorly or inappropriately clad for the weather
- Poor school attendance or often late for school
- Poor concentration
- Affection or attention seeking behaviour
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones, for example growth, weight
- Failure to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is regularly not collected or received from school
- The child is left at home alone or with inappropriate carers

## 2. Physical abuse

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.

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- Multiple bruises in clusters, or of uniform shape
- Bruises that carry an imprint, such as a hand or a belt
- Bite marks
- Round burn marks
- Multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks;
- An injury that is not consistent with the account given
- Changing or different accounts of how an injury occurred
- Bald patches
- Symptoms of drug or alcohol intoxication or poisoning
- Unaccountable covering of limbs, even in hot weather
- Fear of going home or parents being contacted
- Fear of medical help
- Fear of changing for PE
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

## 3. Sexual abuse

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 rape and/or penetration or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Anal or vaginal discharge, soreness or scratching
- Reluctance to go home
- Inability to concentrate, tiredness
- Refusal to communicate
- Thrush, persistent complaints of stomach disorders or pains
- Eating disorders, for example anorexia nervosa and bulimia
- Attention seeking behaviour, self-mutilation, substance abuse
- Aggressive behaviour including sexual harassment or molestation
- Unusual compliance
- Regressive behaviour, enuresis, soiling
- Frequent or openly masturbating, touching others inappropriately
- Depression, withdrawal, isolation from peer group
- Reluctance to undress for PE or swimming
- Bruises or scratches in the genital area



## 4. Sexual exploitation

Child sexual exploitation occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to Birmingham Children’s Trust. The significant indicators are:

- Having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- Entering and/or leaving vehicles driven by unknown adults
- Possessing unexplained amounts of money, expensive clothes or other items
- Frequenting areas known for risky activities
- Being groomed or abused via the Internet and mobile technology; and
- Having unexplained contact with hotels, taxi companies or fast food outlets.
- Missing for periods of time (CSE and county lines)

## 5. Emotional abuse

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

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- The child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Sudden speech or sensory disorders
- Inappropriate emotional responses, fantasies
- Neurotic behaviour: rocking, banging head, regression, tics and twitches
- Self-harming, drug or solvent abuse
- Fear of parents being contacted
- Running away
- Compulsive stealing
- Appetite disorders - anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis.

N.B: Some situations where children stop communicating suddenly (known as “traumatic mutism”) can indicate maltreatment.

## 6. Responses from parents/carers

Research and experience indicate that the following responses from parents may suggest a cause for concern across all five categories:

- Delay in seeking treatment that is obviously needed
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- Reluctance to give information or failure to mention other known relevant injuries
- Frequent presentation of minor injuries
- A persistently negative attitude towards the child
- Unrealistic expectations or constant complaints about the child
- Alcohol misuse or other drug/substance misuse
- Parents request removal of the child from home; or
- Violence between adults in the household
- Evidence of coercion and control.

## 7. Disabled children

When working with children with disabilities, practitioners need to be aware that additional possible indicators of abuse and/or neglect may also include:

- A bruise in a site that may not be of concern on an ambulant child such as the shin, maybe of concern on a non-mobile child
- Not getting enough help with feeding leading to malnourishment
- Poor toileting arrangements
- Lack of stimulation
- Unjustified and/or excessive use of restraint
- Rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries
- Unwillingness to try to learn a child's means of communication
- Ill-fitting equipment, for example, callipers, sleep boards, inappropriate splinting
- Misappropriation of a child's finances; or
- Inappropriate invasive procedures.

## Appendix 2

### Dealing with a disclosure of abuse

When a pupil tells me about abuse they have suffered, what should I remember?

- Stay calm.
- Do not communicate shock, anger or embarrassment.
- Reassure the child. Tell her/him you are pleased that s/he is speaking to you.
- Never enter into a pact of secrecy with the child. Assure her/him that you will try to help but let the child know that you will have to tell other people in order to do this. State who this will be and why.
- Tell her/him that you believe them. Children very rarely lie about abuse; but s/he may have tried to tell others and not been heard or believed.
- Tell the child that it is not her/his fault.
- Encourage the child to talk but do not ask "leading questions" or press for information.
- Listen and remember.
- Check that you have understood correctly what the child is trying to tell you.
- Praise the child for telling you. Communicate that s/he has a right to be safe and protected.
- Do not tell the child that what s/he experienced is dirty, naughty or bad.
- It is inappropriate to make any comments about the alleged offender.
- Be aware that the child may retract what s/he has told you. It is essential to record in writing, all you have heard, though not necessarily at the time of disclosure.
- At the end of the conversation, tell the child again who you are going to tell and why that person or those people need to know.
- As soon as you can afterwards, make a detailed record of the conversation using the child's own language. Include any questions you may have asked. Do not add any opinions or interpretations.
- If the disclosure relates to a physical injury do not photograph the injury but record in writing as much detail as possible.

NB - it is not staff's role to seek disclosures. Their role is to observe that something may be wrong, ask about it, listen, be available and try to make time to talk.

### Immediately after a disclosure

You should not deal with this yourself. Clear indications or disclosure of abuse must be reported to Birmingham Children's Trust without delay, by the Senior DSL, Head Teacher, or in exceptional circumstances by the staff member who has raised the concern.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak. Listening to and supporting a child who has been abused can be traumatic for the adults involved. Support for you will be available from your DSL or manager.

## Appendix 3: allegations of abuse made against staff

### Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, student, 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 both inside and outside of school

All concerns must be brought to the attention of the Trust's CEO. If we're in any doubt as to whether a concern meets the harm threshold, the CEO will consult our local authority designated officer (LADO). The CEO can delegate this to the head teacher if the concern relates to school staff or to the Lead DSL if the concern relates to staff within other departments. If the concerns are about the CEO, the Lead DSL will contact the chair of Trustees.

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.

Following the advice from LADO, a 'case manager' will lead any investigation. This will be the headteacher, the Lead DSL or the chair of governors where the headteacher is the subject of the allegation, or the chair of Trustees if the CEO is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

### Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that 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/department so that they do not have unsupervised access to children
- Moving the child or children to classes/groups 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 department in the Trust.
- If in doubt, the case manager will seek views from HR and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### 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

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

1. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
2. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children in the Trust is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the Lead DSL and make a risk assessment of the situation. If necessary, the Lead DSL may make a referral to children's social care
6. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
7. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
8. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school/Trust and/or liaise with the police and/or children's social care services as appropriate
9. Provide effective support for the individual facing the allegation or concern, HR will be the point of contact including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. If the member of staff is a member of a Trade Union, HR will advise them to make contact and take advice.
10. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against staff (where this applies) while

investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a staff member will be advised to seek legal advice

11. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
12. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible we 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 Trust's disciplinary process, should this be required at a later point.

### **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 Trust, 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 governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the Trust, 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.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and 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.

### **Specific actions**

#### **Action following a criminal investigation or prosecution**

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

## **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the Trust ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the we will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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 and HR 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/child care settings.

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the CEO/head teacher and or Lead 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 Trust 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

## **Confidentiality and information sharing**

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

The case manager will take advice from the 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

## **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, are 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 Trust will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

## 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 Trust'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, students 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 Trust
- 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 Trust 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

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone contrary to the Trust's Mobile Phone/Device Policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils
- Using inappropriate sexualised, intimidating or offensive language

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns
- Empowering staff to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the Trust's safeguarding system

## Responding to low-level concerns

If the concern is raised via a third party, a senior member of staff will collect evidence where necessary by speaking:

- › Directly to the person who raised the concern, unless it has been raised anonymously
- › To the individual involved and any witnesses

The senior member of staff will use the information collected to categorise the type of behaviour and determine any further action, in line with the Trust's staff behaviour policy/code of conduct. The senior manager/head teacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the Lead DSL and HR manager.

## Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the Trust

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## Appendix 4

### Indicators of vulnerability to radicalisation

1. Radicalisation is defined in KCSiE 2020 as:  
The process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
2. Extremism is defined by the government in the Prevent Strategy as:  
Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.
3. Extremism is defined by the Crown Prosecution Service as:  
The demonstration of unacceptable behaviour by using any means or medium to express views which:

- Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.
4. KCSiE 2020 describes terrorism as an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no such thing as a “typical extremist”. Those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.

5. Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
- **Identity crisis** - the student/pupil is distanced from their cultural/religious heritage and experiences discomfort about their place in society
  - **Personal crisis** - the student/pupil may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
  - **Personal circumstances** - migration; local community tensions; and events affecting the student/pupil's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy
  - **Unmet aspirations** - the student/pupil may have perceptions of injustice; a feeling of failure; rejection of civic life
  - **Experiences of criminality** - which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration
  - **Special educational need** - students/pupils may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. This list is not exhaustive, nor does it mean that all children experiencing the above are at risk of radicalisation for the purposes of violent extremism.
8. More critical risk factors could include:
- Being in contact with extremist recruiters
  - Family members convicted of a terrorism act or subject to a Channel intervention
  - Accessing violent extremist websites, especially those with a social networking element
  - Possessing or accessing violent extremist literature
  - Using extremist narratives and a global ideology to explain personal disadvantage
  - Justifying the use of violence to solve societal issues
  - Joining or seeking to join extremist organisations
  - Significant changes to appearance and/or behaviour; and
  - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.

## Appendix 5

### Preventing violent extremism - Roles and responsibilities of the Single Point of Contact (SPOC)

The SPOC for **School** is Kerenza Palmer, who is responsible for:

- Ensuring that staff are aware that you are the SPOC in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Maintaining and applying a good understanding of the relevant guidance in relation to preventing students/pupils from becoming involved in terrorism, and protecting them from radicalisation by those who support terrorism or forms of extremism which lead to terrorism;
- Raising awareness about the role and responsibilities of School in relation to protecting students/pupils from radicalisation and involvement in terrorism;
- Monitoring the effect in practice of the school's RE curriculum and assembly policy to ensure that they are used to promote community cohesion and tolerance of different faiths and beliefs;
- Raising awareness within the Trust about the safeguarding processes relating to protecting students/pupils from radicalisation and involvement in terrorism;
- Acting as the first point of contact within the school/Trust for case discussions relating to students/pupils who may be at risk of radicalisation or involved in terrorism;
- Collating relevant information in relation to referrals of vulnerable students/pupils into the Channel<sup>1</sup> process;
- Attending Channel meetings as necessary and carrying out any actions as agreed;
- Reporting progress on actions to the Channel co-ordinator; and sharing any relevant additional information in a timely manner.

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<sup>1</sup> Channel is a multi-agency approach to provide support to individuals who are at risk of being drawn into terrorist related activity. It is led by the West Midlands Police Counter-Terrorism Unit, and it aims to

- Establish an effective multi-agency referral and intervention process to identify vulnerable individuals;
- Safeguard individuals who might be vulnerable to being radicalised, so that they are not at risk of being drawn into terrorist-related activity; and
- Provide early intervention to protect and divert people away from the risks they face and reduce vulnerability.

## Appendix 6 – COVID-19 and safeguarding

Schools must have regard to the statutory safeguarding guidance, **keeping children safe in education** and should refer to the now updated and update safeguarding procedures in line with DfE updates.

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak>

## Appendix 7 - Online safety

**Coronavirus (COVID-19): keeping children safe online** - All schools and colleges should continue to consider the safety of their children when they are asked to work online. The starting point for online teaching should be that the same principles as set out in the school's or college's staff behaviour policy (sometimes known as a code of conduct) should be followed. This policy should amongst other things include acceptable use of technologies, staff pupil/student relationships and communication including the use of social media. The policy should apply equally to any existing or new online and distance learning arrangements which are introduced. Schools and colleges should, as much as is reasonably possible, consider if their existing policies adequately reflect that some children (and in some cases staff) continue to work remotely online. As with the child protection policy, in some cases an annex/addendum summarising key coronavirus related changes may be more effective than re-writing/re-issuing the whole policy.

The principles set out in the **guidance for safer working practice for those working with children and young people in education settings** published by the Safer Recruitment Consortium may help schools and colleges satisfy themselves that their staff behaviour policies are robust and effective. In some areas schools and colleges may be able to seek support from their local authority when planning online lessons/activities and considering online safety.

Schools and colleges should continue to ensure any use of online learning tools and systems is in line with privacy and data protection requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school or college this should also signpost children to age appropriate practical support from the likes of:

- **Childline** - for support
- **UK Safer Internet Centre** - to report and remove harmful online content
- **CEOP** - for advice on making a report about online abuse

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should continue to be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school or college online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, schools and colleges should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children.

Support for parents and carers to keep their children safe online includes:

- **Thinkuknow** provides advice from the National Crime Agency (NCA) on staying safe online.
- **Parent info** is a collaboration between Parentzone and the NCA providing support and

guidance for parents from leading experts and organisations.

- **Childnet** offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support.
- **Internet Matters** provides age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world.
- **London Grid for Learning** has support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online.
- **Net-aware** has support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games.
- **Let's Talk About It** has advice for parents and carers to keep children safe from online radicalisation.
- **UK Safer Internet Centre** has tips, advice, guides and other resources to help keep children safe online, including parental controls offered by home internet providers and safety tools on social networks and other online services.

Government has also provided:

- **Support to stay safe online** includes security and privacy settings, blocking unsuitable content, and parental controls.

The department encourages schools and colleges to share this support with parents and carers.