

**EDUCATION**

**Child Protection & Safeguarding Policy**

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| **Approved by**  | **Name**  | **Date**  |
| Head of Education  | Lauren Tallis  | July 2022  |
| Education Review Board  |  | July 2022  |

Document reviews

The information in the table below provides details of this document’s reviews and where appropriate, amendments which will have been made to a later version and the reason.

|  |  |  |
| --- | --- | --- |
| Version  | Review Description  | Date  |
| 1  | Original  | Sept 2018  |
| 2  | Updated to reflect new standards  | Jan 2019  |
| 3  | Updated to new policy format with procedures inserted, updated LADO email contact, Extremist tool-kit information  | Apr 2019  |
| 4  | Updated to include updates following managing allegations against staff training  | Jun 2019  |
| 5  | Updated following the KCSIE September 2019 changes  | Sept 2019  |
| 6  | Updated to reflect Ofsted Guidance  | Mar 2020  |
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**Safeguarding Children Policy (including Child Protection)**

## 1. Policy Statement

*The Children’s Homes (England) Regulations 2015*

‘The protection of children standard 12.—(1) The protection of children standard is that children are protected from harm and enabled to keep themselves safe.’

In Relation to Children and young people safeguarding and promoting their welfare is defined in ‘*Working together to safeguarding Children*’ as: -

* Protecting Children from maltreatment
* Preventing impairment of children health or development
* Ensuring that children grow up in circumstance consistent with the provision of safe and effective care.
* Taking action enable all children to have the best outcomes.

*Keeping Children Safe in Education* states that: “Safeguarding and promoting the welfare of children is everyone’s responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child”.

# Safeguarding Statement of intent

Our Place School Safeguarding and Child Protection policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2020 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools ), the Non-maintained Special Schools (England) Regulations 2015 (for non-maintained special schools) and the guidance contained in [Working Together to Safeguard Children 2018](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf), the DfE’s statutory Guidance - [keeping children safe in education](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf)

**School Details:**

Address: Our Place School, The Orchard, Bransford, Worcester WR6 5JE

Phone: 01886 833378

Email. contactus@ourplaceschools.com

## 2. Key Personnel

**Designated Safeguarding Leads**: (Education): Lauren Tallis.

**Deputy DSL** (Education): Ali Price, Marc Soley

Other named staff and contacts:

# Designated Teacher for Looked after Children: Lauren Tallis. Online safety Co-ordinator: Lauren Tallis

# Local Authority Designated Officer/Position of Trust: lado@worcschildrenfirst.org.uk

**Family Front Door**: 01905 822666 (core working hours) **Out of hours** or at weekends: 01905 768020

* Chanel Chair - Paul Kinsella (Advanced Public Health Practitioner)
* Safeguarding Advisor – Denise Hannibal.

[NSPCC’s whistleblowing advice line](https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/) dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by Our Place School. The NSPCC whistle blowing helpline number is also available (0800 028 0285).

Staff can call **0800 028 0285** – line is available from 8:00 am to 8:00 pm, Monday to Friday and email: help@nspcc.org.uk [NSPCC - When to call the police](https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf)

 **Introduction**

Our Place School fully recognises the contribution it can make to protect and support pupils in School. The aim of this policy is to safeguard and promote our pupils' welfare, safety, health, and well-being by creating an honest, open, caring and supportive environment. The pupils' welfare is of paramount importance.

This policy is also based on the following legislation*:*

Keeping Children Safe in Education has been extended from early years, schools and colleges to cover 16-19 academies (and apprenticeships).There is reference to the [Education and Training (Welfare of Children) Act 2021](https://www.legislation.gov.uk/ukpga/2021/16/introduction) which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 and places safeguarding duties on 16 to 19 academies and further education to ensure that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.

* Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
* The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
* Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
* The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
* Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
* The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
* Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what ‘regulated activity’ is in relation to children
* Statutory guidance on the Prevent duty, which explains schools’ duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
* Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at [Charity Commission Guidance](https://www.gov.uk/guidance/charity-commission-guidance)

Our staff are aware of the [West Midlands procedures:](https://westmidlands.procedures.org.uk/)

Our Place School policy applies to all our staff, governors, volunteers, and visitors to our school. Child protection is the responsibility of all our staff. We will ensure that we will comply with our duties under all relevant legislation We will ensure this policy and our procedures are effective and comply with the law at all times, this includes training for all staff.

We will ensure that all our parents and working partners are aware of this policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on the school website and by raising awareness at meetings with our parents/carers.

In our school the Education Review Board and proprietors will ensure we facilitate a whole school approach to safeguarding. Ultimately, all our systems, processes and policies will operate with the best interests of the child/children at their heart. Where there is a safeguarding concern, our proprietors and school leaders should ensure the child’s wishes and feelings are sought and taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

Raising concerns/complaints. We respond robustly when concerns are raised or complaints made (from children, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. The school will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The school's complaints procedures are available on the website.

All our staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Where the Headteacher is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO).

Statutory guidance contains further information on: [The Role and Responsibilities of the Designated Teacher](https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children)

 Human Rights Act

 The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual’s human rights when they make individual decisions about them.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances. Further information (including on absolute and qualified rights) can be found at Human Rights Equality and Human Rights Commission ( equalityhumanrights.com ).

**Equality Act**

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK (www.gov.uk), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission (equalityhumanrights.com).

# Safeguarding Commitment

At Our Place School we will:

* Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to.
* Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty.
* Include in the curriculum activities and opportunities (specifically through PHSE/ ICT/RSE, which equip children with the skills they need to stay safe from abuse (including online) and to know where to get help.
* Ensure every effort if made to establish effective working relationships with parents/carers and colleagues from other agencies.
* Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools “s128” For senior leaders and members of the Education Review Board.
* As Education Safeguarding Practitioners we will liaise with the three safeguarding partners in line with Working Together 2018.
* Criminal history and suitability to work with children information should only be requested from applicants who have been shortlisted.
* As part of the shortlisting process schools and colleges should consider conducting an online search as part of their due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.
* Contextual safeguarding concerns local to us are violence and sexual offences and anti-social behaviour (June 2022, crime-statistics.co.uk)

What our school staff need to know:

**All** staff are aware of systems within our school which support safeguarding, and these should be explained to them as part of staff induction. This should include the:

* child protection policy.
* behaviour policy (which should include measures to prevent bullying, including cyberbullying),
* staff behaviour policy (sometimes called a code of conduct).
* safeguarding response to children who go missing from education; and
* role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
* Copies of policies and a copy of Part one (or Annex A in Keeping Children Safe if appropriate) of this document is provided to staff at induction.
* **All our** staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training is regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
* **All our** staff will be aware of their local early help process and understand their role in it.
* **All our** staff are aware of the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
* **All our staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.
* **All our** staff know what to do if a child tells them he/she is being abused, exploited, or neglected. Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children’s social care. Staff never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
* **All our** staff are able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

**All our** staff receive appropriate safeguarding and child protection training (including online safety) at induction. The training should be regularly updated. In addition, all our staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

## 4. Definitions and signs of abuse

The terms “children” and “child” refer to anyone under the age of 18.

For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:

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

For the purposes of this policy, “consent” is defined as having the freedom and capacity to choose to engage in sexual activity. Consent may be given to one sort of sexual activity but not another, and can be withdrawn at any time during sexual activity and each time activity occurs. A person only consents to a sexual activity if they agree by choice to that activity, and has the freedom and capacity to make that choice. Children under the age of 13 can never consent to any sexual activity. The age of consent is 16.

# Signs and Symptoms of Physical abuse

For the purposes of this policy “abuse” is defined as a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institute or community setting by those known to them or by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by one or multiple adults or other children.

For the purposes of this policy, “physical abuse” is defined as a form of abuse which may involve actions such as hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating, or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child.

It is normal for children to have cuts and bruises on their bodies caused by accidents which happen whilst they are moving about and/or playing. These are marks that have an acceptable and reasonable explanation.

Marks or injuries which do not have an acceptable explanation may indicate that a child has been abused. This may include:

Bruising:

* Bruises on the cheeks, ears, palms, arms and feet
* Bruises on the back, buttocks, tummy, hips and backs of legs
* Multiple bruises in clusters, usually on the upper arms or outer thighs
* Bruising which looks like it has been caused by fingers, a hand, or an object (i.e. belt, shoe, etc.) –
* Large oval shaped bite marks. Burns or scalds:
* Any burns which have a clear shape of an object, e.g. cigarette burns
* Burns to the backs of hands, feet, legs, genitals, or buttocks.

Other signs of physical abuse include multiple injuries (i.e. bruising, fractures) inflicted at different times. It is particularly concerning if parents/carers are unable to explain these injuries and it is not clear whether they took the child to receive medical treatment at the time of the injury.

Be vigilant to possible abuse if a child is frequently described as ill by their parent or carer but does not have any symptoms which are obvious to others. In addition, the parent will be unable to provide details of a medical diagnosis for the child’s apparent condition.

# Emotional abuse

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

Cyberbullying is a growing problem and includes:

* Sending threatening or disturbing text messages
* Homophobia, racism or sexism
* Making silent, hoax or abusive calls
* Creating and sharing embarrassing images or videos
* ‘Trolling’, the sending of menacing or upsetting messages on social networks, chat rooms or online games
* Excluding children from online games, activities or friendship groups
* Setting up hate sites or groups about a particular child
* Encouraging young people to self-harm
* Voting for someone in an abusive poll
* Hijacking or stealing online identities to embarrass a young person or cause trouble using their name - Sending ‘sexts’ to pressure a child/peer into sending images or other activity.

# Signs and Symptoms of Emotional abuse

It is important to remember that some children are naturally open and affectionate whilst others are quieter and more self-contained.

Children also develop at different rates from one another and some may be slightly more or less advanced than other children in their age group. Mood swings and challenging behaviour are also a normal part of growing up for teenagers and children going through puberty. Be alert to behaviours which appear to be out of character for the individual child.

The following signs may indicate emotional abuse:

* Inappropriate knowledge of ‘adult’ matters such as sex, alcohol and drugs
* Extreme emotional outbursts
* Very low self-esteem, often with an inability to accept praise or to trust
* Lack of any sense of fun, over-serious or apathetic
* Excessive clingy or attention seeking behaviour
* Over-anxiety, either watchful and constantly checking or over-anxious to please
* Developmental delay, especially in speech
* Substantial failure to reach potential in learning, linked with lack of confidence, poor concentration and lack of pride in achievement
* Self-harming, compulsive rituals, stereotypic repetitive behaviour - Unusual pattern of response to others showing emotions.

# Sexual abuse, violence and harassment

“Sexual abuse” is defined as abuse that involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening.

The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Recognition of sexual abuse generally follows either a direct statement from the child (or very occasionally from the abuser), or more often, suspicion based on the child’s circumstances, behaviour, or physical symptoms or signs.

For the purposes of this policy, “sexual violence” refers to the following offences as defined under the Sexual Offences Act 2003:

* Rape: A person (A) commits an offence to rape if they intentionally penetrate the vagina, anus or mouth of another person (B) with their penis, B does not consent to the penetration, and A does not reasonably believe that B consents.
* Assault by penetration: A person (A) commits an offence if they intentionally penetrate the vagina or anus of another person (B) with a part of their 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 they intentionally touch 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) commis an offence if they intentionally cause 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.

For the purposes of this policy, “Sexual harassment” refers to unwanted conduct of a sexual nature that

occurs online or offline, inside or outside of school. Sexual harassment is likely to violate a person’s dignity, make them feel intimidated, degraded or humiliated, and create a hostile, offensive or sexualised environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence. Sexual harassment can include, but is not limited to:

* Sexual comments, such as sexual stories, lewd comments, sexual remarks about clothes and appearance, and sexualised name-calling.
* Sexual “jokes” and taunting.
* Physical behaviour, such as deliberately brushing against someone, interfering with someone’s clothes, and displaying images of a sexual nature.
* Online sexual harassment, which may be standalone or part of a wider pattern of sexual harassment and/or sexual violent. This includes:
	+ The consensual and non-consensual sharing of nude and semi-nude images and/or videos. o Sharing unwanted explicit content. o Upskirting. o Sexualised online bullying. o Unwanted sexual comments and messages, including on social media.
	+ Sexual exploitation, coercion and threats.

For the purposes of this policy, “upskirting” refers to the act, as identified in the Voyeurism (Offences) Act 2019, of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks, with or without clothing, to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Upskirting is a criminal offence. Anyone, including pupils and staff, of any gender can be a victim of upskirting.

For the purposes of this policy, “consensual and non-consensual sharing of nude and semi-nude images and/or videos”, colloquially known as “sexting”, is define as the sharing between children/staff of sexually explicit content, including indecent imagery. This is defined as:

* Nude or semi-nude sexual posing
* A child touching themselves in a sexual way
* Any sexual activity involving a child
* Someone hurting a child sexually
* Sexual activity that involves animals.

# Signs and Symptoms of Sexual abuse

Sexual abuse often presents itself in a veiled way. Although some child victims have obvious genital injuries, a sexually transmitted disease or are pregnant, relatively few show such obvious signs.

The following list of commonly observed indicators is not exhaustive and there may be situations where none of them is present, even though a child is known to have been abused sexually. Equally, even if some are present it may also not be definitive of sexual abuse. These physical signs should alert professionals to the possibility of abuse. Suspicion increases where several features are present together.

Physical manifestations:

* Sexually transmitted diseases
* Pregnancy (especially in younger girls or when identity of father is uncertain)
* Genital lacerations or bruising
* Vaginal bleeding in pre-pubescent girls - Abnormal dilation of vagina, anus or urethra - Additional physical signs.
* Although these signs are not on their own indicative of sexual abuse, they include:
* Itching, redness, soreness
* Unexplained bleeding from vagina or anus
* Daytime wetting
* Faecal soiling or retention. Emotional and behavioural manifestations
* Behaviour with sexual overtones (depending on age and understanding):
* Explicit or frequent sexual preoccupation in talk and play
* Sexual relationships with adults or other children
* Hinting at sexual activity or secrets through words, play or drawings.

Children may also behave in the following ways:

* Withdrawn, fearful or aggressive behaviour to peers or adults
* Running away from home
* Suicide attempts and self-mutilation
* Child psychiatric problems, including behaviour problems
* Withdrawal from social contact
* Onset of wetting or soiling when previously dry and clean
* Severe sleep disturbances
* Arson (fire setting)
* Learning problems which do not match intellectual ability, or poor concentration (NB: for some sexually abused children, school may be a haven - they will arrive early, are reluctant to leave and perform well)
* Marked reluctance to participate in physical activity or to change clothes for PE, etc.

# Neglect

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

* Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
* Protect a child from physical and emotional harm or danger
* Ensure adequate supervision (including the use of inadequate care-givers)
* Ensure access to appropriate medical care or treatment.
* It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

Signs and Symptoms of Neglect:

It is important to remember that some children are very picky eaters whilst others may refuse to wear a coat regardless of how cold it is outside. A child may also appear to be underweight, but is, in fact, naturally thin.

Further Signs of Neglect:

* **Hygiene** = Poor hygiene, frequently smelly or dirty and regularly have dirty and unwashed clothing.
* **Health** = Untreated health and dental problems, Poor muscle tone and prominent joints, Poor skin; sores, rashes, flea bites, scabies and ringworm, Thin swollen tummy, Injuries caused by accidents, e.g. cuts or burns becoming infected, anaemia, Incontinence, Faltering growth and not reaching developmental milestones, Recurring illness or infections.

- **Nutrition** = Often hungry, No breakfast.

- **Development** = Being tired, Withdrawn and unhappy, anxious and avoiding people, Difficulty making friends, Poor language and communication skills, Poor social skills, Missing school.

Some of the most obvious signs of neglect (e.g. children being thin, dirty or not wearing a coat) are not in themselves indicators of abuse. However, if, over time, it is clear that a child is not receiving an adequate level of care and supervision appropriate to their age, it may indicate that the child is being neglected.

Other safeguarding issues:

**Online Safety**

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school and college approach to online safety empowers a school or college 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. All staff are aware that abuse can take place solely online.

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: child on child 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 [APWG | Unifying The Global Response To Cybercrime](https://apwg.org/)

## 5. Bullying

Including, racist, disability, homophobic and transphobic abuse and other prejudice-based bullying See also Our Place School’s Anti- Bullying Policy, Child on child Abuse and Online Safety Policy.

Bullying occurs when a person or group of people behave in ways which are designed to cause distress or to hurt a person or group of people. Bullying can be overt and plain for all to see or can be subtle and insidious. It can take many forms, but the three main types are:

* Physical – e.g. hitting, kicking, theft
* Verbal – e.g. racist or homophobic remarks, threats, name calling
* Psychological – e.g. excluding from social groups and activities, spreading hurtful rumours.

## 6. Honour Based Abuse - including Female Genital Mutilation and Forced Marriage

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing.

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. If in any doubt, staff should speak to the designated safeguarding lead.

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.

Female genital mutilation (FGM) is the partial or total removal of external female genitalia or other injury to the female genital organs for non-medical reasons. It’s also known as female circumcision, cutting or sunna. Religious, social or cultural reasons are sometimes given for FGM. However, FGM is child abuse. It’s dangerous and has been a criminal offence in the UK since 1985.

In 2003 it also became a criminal offence for UK nationals or permanent UK residents to take their child abroad to have female genital mutilation. Anyone found guilty of the offence faces a maximum penalty of 14 years in prison.

There are no medical reasons to carry out FGM. It doesn’t enhance fertility and it doesn’t make childbirth safer. It is used to control female sexuality and can cause severe and long-lasting damage to physical and emotional health.

FGM is a hidden crime, so we don’t know exactly how common it is. Even partial removal or ‘nipping’ can risk serious health problems for girls and women.

FGM is usually performed by someone with no medical training. Girls are given no anaesthetic, no antiseptic treatment and are often forcibly restrained. The cutting is made using instruments such as a knife, a pair of scissors, scalpel, glass or razor blade.

Girls are more at risk if FGM has been carried out on their mother, sister or a member of their extended family.

A girl at immediate risk of FGM may not know what’s going to happen. But she might talk about:

* being taken ‘home’ to visit family
* a special occasion to ‘become a woman’ an older female relative visiting the UK.
* She may ask a teacher or another adult for help if she suspects FGM is going to happen or she may run away from home or miss school.

A girl or woman who has had FGM may:

* have difficulty walking, sitting or standing
* spend longer than normal in the bathroom or toilet
* have unusual behaviour after an absence from school or college
* be particularly reluctant to undergo normal medical examinations
* ask for help, but may not be explicit about the problem due to embarrassment or fear.
* FGM can be extremely painful and dangerous. It can cause:
* severe pain
* shock
* bleeding
* infection such as tetanus, HIV and hepatitis B and C
* organ damage
* blood loss and infections that can cause death in some cases.
* Long-term effects
* Girls and women who have had FGM may have problems that continue through adulthood, including:
* difficulties urinating or incontinence
* frequent or chronic vaginal, pelvic or urinary infections
* menstrual problems
* kidney damage and possible failure
* cysts and abscesses
* pain when having sex
* infertility
* complications during pregnancy and childbirth
* emotional and mental health problems.

The FGM helpline is 0808 028 3550.

Our Place School is an ‘open environment’, where young people feel able to discuss issues that they may be facing:

* The DSLs are aware of the issues surrounding FGM and Forced Marriage
* Advice and signposting are available for accessing additional help, e.g. the NSPCC’s helpline, ChildLine services, Forced Marriage Unit
* Awareness raising about FGM is incorporated in the school’s safeguarding training.

If there is a disclosure of abuse of this kind, or staff are concerned for any other reason, they are advised:

* to alert the DSL to their concerns. This member of staff will then refer concerns to children’s social care, who will inform the police. If a pupil has disclosed that they are at risk in this way, the case will still be referred to social care even if it is against the pupil’s wishes. Where a staff member discovers that an act of FGM appears to have been carried out on a girl who is aged under 18, there will be a statutory duty for it to be reported to the police
* not to consult or discuss with the pupil’s parents or family, or others within the community.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girls being at risk from FGM, or already having suffered from FGM.

There is a range of potential indicators that a girl may be at risk of FGM.

Warning signs that FGM may be about to take place, or may have already taken place, can be found on pages 16-17 of the Multi- Agency Practice Guidelines and chapter 9 of those guidelines (p42-44) focuses on the role of schools and colleges. Section 5C of the Female Genital Mutilation Act 2003 (as inserted by section 75 of the Serious Crime Act 2015) give Government powers to issue statutory guidance on FGM to relevant persons. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) will place statutory duty upon staff, along with social workers and healthcare professionals, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. If a member of staff, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18 they must report this to the police immediately.

Mandatory reporting commenced in October 2015. Staff must report to the police cases where they discover that an act of FGM appears to have been carried out.

For further information see Section 5b of the Female Genital Mutilation Act 2003 or in Keeping Children Safe in Education, September 2022.

# Breast Ironing

Breast Ironing is practiced in some African countries, notably Cameroon. Girls aged between 9 and 15 have hot pestles, stones or other implements rubbed on their developing breast to stop them growing further. In the vast majority of cases breast ironing is carried out by mothers or grandmothers and the men in the family are unaware. Estimates range between 25% and 50% of girls in Cameroon are affected by breast ironing, affecting up to 3.8 million women across Africa.

Why does breast ironing happen?

The practice of breast ironing is seen as a protection to girls by making them seem ‘child-like’ for longer and reduce the likelihood of pregnancy. Once girls’ breasts have developed, they are at risk of sexual harassment, rape, forced marriage and kidnapping; consequently, breast ironing is more prevalent in cities. Cameroon has one of the highest rates of literacy in Africa and ensuring that girls remain in education is seen as an important outcome of breast ironing.

Breast ironing is a form of physical abuse that has been condemned by the United Nations and identified as Gender-based Violence. Although, countries where breast ironing is prevalent have ratified the African Charter on Human Rights to prevent harmful traditional practices, it is not against the law.

Breast ironing does not stop the breasts from growing, but development can be slowed down. Damage caused by the ‘ironing’ can leave women with malformed breasts, difficulty breastfeeding or producing milk, severe chest pains, infections and abscesses. In some cases, it may be related to the onset of breast cancer.

Concerns have been raised that breast ironing is also to be found amongst African communities in the UK, with as many as 1000 girls at risk.

Staff worried about the risk of breast ironing in their school should speak to the Designated Safeguarding Lead as soon as possible. Schools need to know the risk level within their communities and tackle the risk as appropriate.

Where schools have a concern about a child, they should contact Children’s Social Care Services. If the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

* Contact the parents before seeking advice from children’s social care;
* Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it.

Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

**The ‘one chance’ rule**

In the same way that we talk about the ‘one chance rule’ in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the ‘one chance’, of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child’s disclosure that they bring forward their plans or take action to silence her.

# Forced Marriage

A forced marriage is a marriage in which one or both people do not (or in cases of people with learning disabilities cannot) consent to the marriage but are coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/ child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014. A forced marriage is not the same as a pre-introduced or arranged marriage which is common in several cultures, whereby the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

All staff will be alert to the indicators that a pupil is at risk of forced marriage, including:

* Becoming anxious, depressed and emotionally withdrawn with low self-esteem.
* Showing signs of mental health disorders and behaviours such as self-harm or anorexia.
* Displaying a sudden decline in their educational performance, aspirations, or motivation.
* Regularly being absent from school.
* Displaying a decline in punctuality.
* An obvious family history of older siblings leaving education early or marrying early.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with Family Front Door.

For further guidance, read ‘Forced Marriage’ and Worcestershire’s Forced Marriage, Honour-Based Violence and Female Genital Mutilation Protocol – January 2016.

## 7. Child on child Abuse

Please also refer to Our Place Schools Child on child abuse Policy

We recognise that children are also vulnerable to physical, sexual and emotional abuse by their peers or siblings.

This is most likely to include, but not limited to: bullying (including cyberbullying bullying), physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; sexting (also known as youth produced sexual imagery); and initiation/hazing type violence and rituals.

Abuse perpetrated by children can be just as harmful as that perpetrated by an adult, so it is important to remember the impact on the victim of the abuse as well as to focus on the support for the child or young person exhibiting the harmful behaviour. Such abuse will always be taken as seriously as abuse perpetrated by an adult and the same safeguarding children procedures will apply in respect of any child who is suffering or likely to suffer significant harm.

Staff must never tolerate or dismiss concerns relating to child on child abuse, must not pass it off as ‘banter’, ‘just having a laugh’ or ‘part of growing up’.

# Allegations of abuse made by other children (Child on child)

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 emotional and learning attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk.

Evidence shows girls, children with SEND and LGBTQ+ children are at greater risk. Staff should be aware of the importance of:

* Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up; not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts.
* Dismissing or tolerating such behaviour risks normalising them. Upskirting which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm is illegal and as such is a specific sexual offence.

Our Place School recognise that children are capable of abusing their peers or other children. This child on child abuse can take the form of physical abuse, sexual violence, sexual harassment, sexting and initiation ceremonies amongst other forms.

Our Place School will make clear that abuse is abuse and should never be tolerated or passed off as “banter” or “part of growing up”. It should be clear as to how victims of child on child abuse will be supported. The allegations will be passed to the Safeguarding team, and will be recorded, investigated and a resolution in place. At all times the alleged victim and alleged perpetrator will be supported and given guidance.

Professional support will be sought if and as necessary.

Child on child abuse can manifest itself in many ways. The Department of Education provides searching screening and confiscation advice for schools which is used in our school policy. The UK Council for Child Internet Safety (UKCCIS) Education Group has recently published sexting advice for schools. Our Place School’s staff should be vigilant and aware of potential of child on child abuse both in day and residential settings.

Reporting and recording of these incidents are essential in the continuing protection of all children and young people in our care.

## 8. Radicalisation and Extremist Behaviour

“Extremism” is 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. Calls for the death of members of the British armed forces is also included in this definition. From 1st July 2015 specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015, in the exercise of their functions, to have “due regard” to the need to prevent people from being drawn into terrorism. This duty is known as the prevent duty. It applied to a wide range of public-facing bodies. Bodies to which the duty applies must have regard to statutory guidance issues under section 29 of the CTSA 2015 (the prevent guidance), Paragraphs 57- 76 of the Prevent guidance are concerned specifically with schools.

Extremism takes many forms and all ideologies are included in this area of safeguarding:

* Islamic extremism
* Left-wing extremism
* Right-wing extremism
* Animal rights extremism

The statutory Prevent guidance summarises the requirements on schools in terms of four general themes: risk assessment, working in partnership, staff training and IT policies.

Our Place Schools is expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation.

These procedures may be set out in existing safeguarding policies on implementing the Prevent Duty

The Prevent Duty builds on existing local partnership arrangements.

The Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to other members of staff on protecting children from the risk of radicalisation. Our Place Schools provides Prevent awareness to all staff [https://www.elearning.prevent.homeoffice.gov.uk](https://www.elearning.prevent.homeoffice.gov.uk/) to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

Our Place Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools. Schools should ensure that suitable filtering is in place. It is also important that schools teach pupils about Online-Safety more generally.

The Department for Education has also published advice for schools on the prevent duty. The advice is intended to complement the Prevent Guidance and signposts other sources of advice and support. Staff should understand when it is appropriate to make a referral to the Channel Programme. Channel is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages.

Section 36 of the CTSA 2015 places a duty on local authorities to ensure Channel panels are in place. The panel must be chaired by the Local Authority and include the police for the relevant Local Authority area. Following a referral, the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary, consent is obtained, arrange for support to be provided to those individuals. Section 38 of the CTSA 2015 requires partners of Channel panels to cooperate with the panel in the carrying out of its functions and with the police in providing information about a referred individual. Schools and colleges which are required to have regard to Keeping Children Safe in Education September 2019 are listed in the CTSA 2015 as partners to cooperate with local Channel panels.

Indicators of vulnerability (signs and symptoms) include:

* Identity
* The student is distanced from their cultural/religious heritage and experiences
* Discomfort about their place in society
* Personal crises, the student may be experiencing family tensions
* A sense of isolation
* Low self-esteem
* They may be disassociated 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 their identity, faith and belonging. Personal Circumstances - Migration
* Local community tensions and events affecting the student’s country of origin may contribute to a sense of grievance that is triggered by a personal experience of racism or discrimination or aspects of Government policy.
* Unmet Aspirations
* The student may have perceptions of injustice
* A feeling of failure
* Rejection of civic life
* Experiences of Criminality
* Involvement with criminal groups
* Imprisonment and poor resettlement/reintegration on release
* Special Educational Needs
* Social interaction
* Empathy with others
* Understanding the consequences of their actions; and awareness of the motivation of others. More Critical Risk factors could include:
* Being in contact with extremist recruiters
* 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
* Experiencing a high level of social isolation, resulting in issues of identity crises and/or personal crises - De-radicalisation
* All-inclusive ethos
* Create doubt or disillusionment
* Question ideas
* Safe discussions
* Range of views

Our Place School follows Worcester County Council and District Authority guidance that they have produced- ‘Supporting practitioners who work with people at risk of radicalisation in Worcestershire- October 2018’.

The introduction states:

“Worcestershire County Council (WCC) and the District Authorities (DAs) in Worcestershire have a longstanding commitment to the elimination of unlawful discrimination, the promotion of equality of opportunity and to promote good relations between different individuals, people and community groups.

The county’s Counter Terrorism Local Profile identifies a risk (albeit low) from the far-right wing and extreme right wing and addressing this issue is part of the work of our PREVENT Strategy Board, reporting to our Safer Communities Board.

It should be noted that Worcestershire borders with Birmingham which has the second highest extremism risk in the country and that recent events have seen EDL activity in both Redditch and Worcestershire with tensions around publicised CSE cases and a proposed new mosque.

WCC and the DAs are committed to ensuring the people and communities of Worcestershire, particularly groups who may be at greater risk, are well safeguarded and protected against making lifestyle choices that mean they could become involved in extreme behaviours.”

## 9. Child Sexual Exploitation

Definition of Child Sexual Exploitation (CSE)

“Sexual exploitation of C & YP under 18 involves exploitative situations, contexts and relationships, where young people (or a third person or persons) receive ‘something’ (e.g. food, accommodation, drugs. Alcohol, cigarettes, affection, gifts money) as a result of them performing, and/or another or others performing on them sexual activities. Child exploitation can occur through the use of technology without the Child’s immediate recognition; for example being persuaded to post sexual images on the internet/mobile phone without immediate payment or gain. In all cases, those exploiting the Child/Young Person will have more power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidation are common, involvement in exploitative relationships being characterised in the main by the C & YP’s limited availability of choice resulting from their social/economic and/or emotion vulnerability.”

# Signs and Symptoms of Child Sexual Exploitation

Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying bullying and grooming. It is important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse and some do not recognise that they are being exploited. However, there are a number of tell-tale signs that the child may be being groomed for sexual exploitation. These include:

* Going missing for periods of time or regularly returning back to the home late
* Regularly missing school or not taking part in education
* Appearing with unexplained gifts or new possessions
* Associating with other young people involved in exploitation
* Having older boyfriends or girlfriends
* Suffering from sexually transmitted infection
* Mood swings or changes in emotional well-being
* Drug and alcohol misuse
* Displaying inappropriate sexualised behaviour.

Our Place School carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school’s or college’s initial response. Important considerations will include:

* the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. We will support victims to be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school’s duty and responsibilities to protect other children;

At Our Place School we recognise the term ‘**victim**’ to refer to those who have been subjected to abuse. But we recognise that not every victim will view themselves as such, also we use the term ‘**alleged perpetrator(s)**’ and where appropriate ‘**perpetrator(s)**.’ Though they caution the use of this term as in some cases the abusive behaviour will have been harmful to the perpetrator as well.

* the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour;
* the ages of the children involved;
* the developmental stages of the children involved;
* any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty
* if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).

# Child Victims of Trafficking

Trafficking of children is a form of human trafficking which means the recruitment, transportation, transfer, harbouring, and/or receipt of a child by means of a threat or use of force or other forms of coercion for the purposes of exploitation.

Trafficking specifically targets the child as an object of exploitation; the child may be unaware of their fate. Reason for trafficking children:

* Sexual exploitation
* Domestic servitude
* Sweatshops, restaurants and other catering work
* Agricultural labour, including tending plants in illegal cannabis farms
* Benefit fraud
* Involvement in petty criminal activity
* Organ harvesting
* Drug mules, drug dealing or decoys for adult drug traffickers
* Illegal inter-country adoption

It is possible that unaccompanied asylum seeking children (UASC) may have been trafficked into the UK and are likely to remain under the influence of their traffickers, even whilst they are looked after.

Any child who has been a victim of trafficking will have a risk assessment setting out how the child will be protected from any trafficker, to minimise any risk of traffickers being able to re-involve a child in exploitative activities. This plan should include contingency plans to be followed if the young person goes missing.

Signs that a child may be trafficked include:

* Is withdrawn and refuses to talk or appears afraid to talk to a person in authority
* Does not appear to have money but does have a mobile phone
* Possession of large amounts of money or expensive belongings with no plausible explanation
* Receives unexplained/unidentified phone calls whilst in placement
* Has a history with missing links and unexplained moves.

# Grooming

Grooming can happen in person, online and in gangs or groups. Once they have established trust, groomers will exploit the relationship by isolating the child from friends or family and making the child feel dependent on them. They will use any means of power or control to make a child believe they have no choice but to do what they want. Groomers may introduce ‘secrets’ as a way to control or frighten the child. Sometimes they will blackmail the child, or make them feel ashamed or guilty, to stop them telling anyone about the abuse. Groomers can use social media sites, instant messaging apps including teen dating apps, or online gaming platforms to connect with a young person or child. They can spend time learning about a young person’s interests from their online profiles and then use this knowledge to help them build up a relationship.

It’s easy for groomers to hide their identity online - they may pretend to be a child and then chat and become ‘friends’ with children they are targeting.

Groomers may look for:

* usernames or comments that are flirtatious or have a sexual meaning
* public comments that suggest a child has low self-esteem or is vulnerable

Groomers don’t always target a particular child. Sometimes they will send messages to hundreds of young people and wait to see who responds.

The DSL will use the Worcester Safeguarding Children’s Board CSE Screening Tool on all occasions when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases if the tool identifies any level of concern the DSL should contact their local Missing and Child Sexual Exploitation Forum and email the completed CSE Screening Tool along with a Family Front Door (FFD) Cause for Concern form. If a child is in immediate danger the police should be called on 999.

Groomers no longer need to meet children in real life to abuse them. Increasingly, groomers are sexually exploiting their victims by persuading them to take part in online sexual activity. Groomers may be male or female. They could be any age. Many children and young people don’t understand that they have been groomed, or that what has happened is abuse.

Grooming can be more than just one single person, it can happen in gangs or groups of people who are of both the same, and different, age, ethnicity, religion and social backgrounds. For further guidance please refer to [www.nspcc.org.uk.](http://www.nspcc.org.uk/)

# MAPPA

Our Place School is in liaison with the Multi-Agency Public Protection Arrangements who share relevant information regarding Category 1, 2 and 3 offenders. Please see the Our Place School Location Risk Assessment for more information.

## 10. Child Criminal Exploitation and County Lines

For the purposes of this policy, “Child criminal exploitation” is defined as a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in criminal activity, for any of the following reasons:

* In exchange for something the victim wants or needs.
* For the financial advantage or other advantage of the perpetrator or facilitator.
* Through violence or threats of violence.

Specific forms of CCE can include:

* Being forced or manipulated into transporting drugs or money through county lines.
* Working in cannabis factories.
* Shoplifting or pickpocketing.
* Committing vehicle crime.
* Committing, or threatening to commit, serious violence to others.

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Signs to look out for:

A young person’s involvement in criminal activity often leaves signs. A person might exhibit some of these signs, either as a member or as an associate of a gang dealing drugs.

* Are they always going missing from school or their home?
* Are they travelling alone to places far away from home?
* Do they suddenly have lots of money/lots of new clothes/new mobile phones?
* Are they receiving much more calls or texts than usual?
* Are they carrying or selling drugs?
* Are they carrying weapons or know people that have access to weapons?
* Are they in a relationship with or hanging out with someone/people that are older and controlling?

# County Lines

County Lines is a very serious issue where criminal gangs set up a drug dealing operation in a place outside their usual operating area. Gangs will move their drug dealing from big cities (e.g. London, Manchester, Liverpool etc.) to smaller towns and rural areas in order to make more money. This can have a really big effect on the community who live there and bring with it serious criminal behaviour.

The UK Government defines county lines as: County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Child criminal exploitation is increasingly used to describe this type of exploitation where children are involved, and is defined as: Child Criminal Exploitation is common in county lines and occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18. The victim may have been criminally exploited even if the activity appears consensual. Child Criminal Exploitation does not always involve physical contact; it can also occur through the use of technology.

Criminal exploitation of children is broader than just county lines and includes, for instance, children forced to work on cannabis farms or to commit theft.

As well as the general indicators for CCE, school staff will be aware of the specific indicators that a pupil may be involved in county lines, including:

* Going missing and subsequently being found in areas away from their home.
* Having been the victim or perpetrator of serious violence, e.g. knife crime.
* Receiving requests for drugs via a phone line.
* Moving drugs.
* Handing over and collecting money for drugs.
* Being exposed to techniques such as “plugging” where drugs are concealed internally to avoid detection.
* Being found in accommodation they have no connection with or a hotel room where there is drug activity.
* Owing a “debt bond” to their exploiters.
* Having their bank account used to facilitate drug dealing.

# Cyber-crime

For the purposes of this policy, “cyber-crime” is defined as criminal activity committed using computers and/or the internet. This includes “cyber-enabled” crimes, i.e. crimes that can happen offline but are enabled at scale and at speed online, and “cyber-dependent” crimes, i.e. crimes that can be committed only by using a computer. Crimes include:

* Unauthorised access to computers, known as “hacking”.
* Denial of Service attacks, known as “booting”.
* Making, supplying or obtaining malicious software, or “malware”, e.g. viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence.

All staff will be aware of the signs of cyber-crime and follow the appropriate safeguarding procedures. This may include the DSL referring pupils to the National Crime Agency’s Cyber Choices programme.

# Young people with family members in prison

Pupils with a family member in prison will be offered support as necessary. They will receive a copy of “*Are you a young person with a family member in prison?*” from Action for Prisoners’ Families where appropriate and allowed the opportunity to discuss questions and concerns.

# Young People required to give evidence in court

Pupils required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed will be offered appropriate support. Pupils will be provided with the booklet “*Going to Court*” from HMCTS where appropriate and given the opportunity to discuss questions and concerns.

## 11. Serious Violence

Through training, all staff will be made aware of the indicators which may signal a pupil is at risk from, or is involved with, serious violent crime. These indicators can include:

* Increased absence from school.
* A change in friendships.
* Relationships with older individuals or groups.
* A significant decline in mood or educational engagement,
* Signs of self-harm.
* A significant change in wellbeing.
* Signs of assault.
* Unexplained injuries.
* Unexplained gifts or new possessions.

Staff will be made aware of some of the most significant risk factors that could increase a pupil’s vulnerability to becoming involved in serious violence. These risk factors include, but are not limited to:

* Being male
* Having been frequently absent from school.
* Having been permanently excluded from school.
* Having experienced child maltreatment.
* Having been involved in offending.

Our Place School has an open environment for young people to feel comfortable to talk to staff.

Our Place School staff will need to ensure that they look for signs of abuse and report anything causing to the DSL immediately.

## 12. Substance Misuse

Due to our registration and assessment process we do not accommodate young people with drug and alcohol abuse as they would not be compatible with our current young people.

As part of our PSHE programme of study we teach our young people about the risks involved through Drug, Alcohol and Tobacco education.

## 13. Domestic Abuse

[Ending Domestic abuse Save Lives](https://safelives.org.uk/)

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 sex or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

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.

Where we identify a victim of domestic abuse being high risk, we will consider a referral to MARAC (multi agency risk assessment conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders. We will continue to provide help and support in order to safeguard children. This will usually be led by the designated safeguarding lead. MARAC does not replace a referral to children social care.

[Worcestershire children first Domestic abuse guidance](https://www.worcestershire.gov.uk/info/20379/domestic_abuse_and_sexual_violence/885/domestic_abuse)

# Operation Encompass

Our Place School are receiving Operation Encompass Notification- Operation Encompass is to highlight that a Domestic Abuse Incident has taken place and the police have been called. We will be keeping an eye on changed behaviour and logging anything out of the ordinary. Operation Encompass is working really well in Worcestershire Schools and Worcestershire Children First have successfully notified over 8000 incidents since 2019. All this is great news for children and their families. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform Worcestershire Children First, who then inform the School (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This is so we have up to date relevant information about the child’s circumstances and can enable support to be given to the child according to their needs.

# Child abduction and community safety incidents

“Child abduction” is defined as the unauthorised removal or retention of a child from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents, other relatives, other people known to the victim, and strangers.

All staff will be alert to community safety incidents taking place in the vicinity of the school that may raise concerns regarding child abduction, e.g. people loitering nearby or unknown adults conversing with pupils.

# Mental Health

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

Staff will not attempt to make a diagnosis of mental health problems – the school will ensure this is done by a trained mental health professional. Staff will, however, be encouraged to identify pupils whose behaviour suggests that they may be experiencing a mental health problem or may be at risk of developing one. Staff will also be aware of how pupils’ experiences can impact on their mental health, behaviour and education.

Staff who have a mental health concern about a pupil that is also a safeguarding concern will act in line with this policy.

## 14. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child’s welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children’s social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: Homeless Reduction Act Factsheets. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children’s services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation.

## 15. Modern Slavery

The Modern Slavery Act 2015 places a new statutory duty on public authorities, including schools, to notify the National Crime Agency (NCA) (section 52 of the Act) on observing signs or receiving intelligence relating to modern slavery. The public authority (including school) bears this obligation where it has “reasonable grounds to believe that a person may be a victim of modern slavery or human trafficking”. Staff need to be aware of this duty and inform the DSL should they suspect or receive information that either parents or their children may be victims of modern slavery. The DSL will then contact the NCA.

## 16. Procedures for managing Concerns

We will follow the procedures set out by Safeguarding Worcestershire

[(www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk/) ) and take account of guidance issued by the Department for Education (DfE), Working Together to Safeguard Children and Keeping Children Safe in Education.

Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the West Mercia Consortium inter-agency procedures and the WSCP Levels of Need Guidance. The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child or young person should be reported without delay and recorded in writing using the agreed template (see Appendix for pro-forma). The DSL will consider what action to take and have appropriate discussions with parents/carers prior to referral to children’s social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation.

All referrals will be made in line with local procedures as detailed on the Worcestershire website. If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children’s Services immediately. Anybody can make a referral. If the child’s situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Headteacher. Concerns should always lead to help for the child at some point.

Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children’s Services, or the police if:

* the situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable;
* they are convinced that a direct report is the only way to ensure the pupil’s safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Headteacher. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children’s Services directly with their concerns.

**17. Health and Safety and Safe Environments**

# Health & Safety

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the safeguarding of our children both within the school environment and when away from the school, for example when undertaking school trips and visits. Risk Assessments are undertaken and reviewed regularly, in respect of site security, risk of children being drawn into terrorism or exposed to extremist behaviour, risk to and from children displaying harmful behaviour.

# Safe Environment

Our Place Group undertakes appropriate risk assessments and checks in respect of all equipment and of the building and grounds in line with local and national guidance and regulations concerning health and safety. The Our Place Group has adequate security arrangements in place in respect of the use of its grounds and buildings by visitors both in and out of school hours. Visitors to the school, for example visiting speakers, theatre groups or curriculum specialists, will be appropriately checked and vetted, to ensure they are not linked to extremist groups or promoting extremist or other harmful material.

**18. Physical Intervention/use of “Reasonable Force”**

Our policy on positive handling is set out in our behaviour policy, a separate policy and acknowledges that staff must only ever use physical intervention as a last resort, and that at all times it must be the minimal force

necessary for the minimal time to prevent injury or damage to property. We understand that physical intervention of a nature that causes injury or distress to a child may be considered under management of allegations or disciplinary procedures.

Staff who are likely to need to use physical intervention will be appropriately trained in the CPI technique, or equivalent. All incidences of physical intervention will be recorded in accordance with the CPI recommended procedures. We recognise that touch is appropriate in the context of working with children and all staff have been given ‘safe working practice’ guidance to ensure they are clear about their professional boundaries which can be viewed in our “Safe Touch” Policy.

## 19. Managing Safeguarding Concerns and Allegations against Staff, including supply teachers, volunteers, and contractors.

All allegations against staff, supply staff, volunteers and contractors will be managed in line with the following processing and procedures. All staff should be mindful of the position of trust that they are in when working within an education and social care setting. They need to comply with guidance about conduct and safe practice, including safe use of mobile phones.

Young People’s allegations or concerns about staff conduct will be taken seriously and followed up in a transparent and timely way.

If an allegation is made which meets the criteria as identified in Part 4 of Keeping Children Safe in Education, the member of staff receiving the allegation will immediately inform the head teacher, unless the allegation concerns the head teacher, in which case the Proprietor will be informed immediately.

For the home the registered manager and the responsible individual will be notified immediately. The head of care or head of education on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.

The home and school will follow the relevant procedure and guidance procedures for managing allegations against staff.

The appropriate head of function will be guided by the LADO and an HR consultant when considering suspension or other neutral protective steps. Publication of material that may lead to the identification of a member of staff who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

When managing allegations against staff, Our Place Group will recognise the distinction between allegations that meet the harms threshold and allegations that do not, also known as “low-level concerns”.

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

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

It applies regardless of whether the alleged abuse took place in the home or school. Allegations against staff who is no longer working and historical allegations of abuse will be referred to the police.

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

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

# Suspension

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

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

* Redeployment within the organisation so that the individual does not have direct contact with the child or children concerned
* Providing an assistant to be present when the individual has contact with children
* Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
* Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents and/or social worker have been consulted.

# Definitions for outcomes of allegation investigations

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

# Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the head of function (or Proprietor where the head of function is the subject of the allegation) – “case manager” – will take the following steps:

1. Immediately discuss the allegation with the Local Authority Designated Officer (LADO). 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 LADO – for example, if the accused individual is deemed to be an immediate risk to children and there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as practicably possible after contacting the police).
2. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (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.
3. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined in 12.2 can be put in place. Advice will be sought from the LADO, police and/or children’s social care services, as appropriate.
4. If immediate suspension is necessary, agree and record the rationale for this with the LADO. 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 Our Place Schools and their contact details.

# For Education

Following the guidance from Keeping Children Safe in Education section 329 “Schools and colleges have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

* the harm test is satisfied in respect of that individual;
* the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence; and
* the individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left.”

Section 329 and 321 continues to say “Referrals should be made as soon as possible, and ordinarily on conclusion of an investigation, when an individual is removed from working in regulated activity, which could include being suspended, or is redeployed to work that is not regulated activity”.

Following this guidance, a DBS referral notification will be made at the point of suspension.

1. 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 LADO 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.
2. If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate.
3. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate e.g. Trade Union representative or the Employee Assistance Programme.
4. Inform the parents and/or social worker of the child/children involved about the allegation as soon as possible if they do not already know (following agreement from children’s social care services and/or police, if applicable). The case manager will also inform the parents and/or social worker of the requirement to maintain confidentiality about any allegation made against a teacher (where this applies) while investigations are ongoing. Any parent/social worker who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
5. Keep the parents and/or social worker of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
6. 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.
7. Where a school dismisses or ceases to use the services of a teacher because of serious misconduct, they must consider whether to refer the case to the Secretary of State for referral to the Teaching Regulation Agency (TRA) Section 333 of KCSIE)
8. 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.
9. Where the police are involved, wherever possible, the education review will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school’s disciplinary process, should this be required at a later date.

# For the Home

1. 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 LADO 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.
2. If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action and/or liaise with the police and/or children’s social care services as appropriate.
3. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate e.g. Trade Union representative or the Employee Assistance Programme.
4. Inform the parents and/or social worker of the child/children involved about the allegation as soon as possible if they do not already know (following agreement from children’s social care services and/or police, if applicable). The case manager will also inform the parents and/or social worker of the requirement to maintain confidentiality about any allegation made against a staff member (where this applies) while investigations are ongoing. Any parent/social worker who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
5. Keep the parents and/or social worker of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
6. 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.

# Timescales

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

# Specific actions

* Action following a criminal investigation or prosecution

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

* Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school’s personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

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

# Individuals returning to work after suspension

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

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

# Unsubstantiated or malicious allegations

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

# Confidentiality

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

The case manager will take advice from the local authority’s designated officer, 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. Such records will include:

A clear and comprehensive summary of the allegation

* Details of the internal strategy meeting held
* Details of how the allegation was followed up and resolved
* Notes of any action taken and decisions reached (and justification for these, as stated above)

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

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

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

# References

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

# Learning lessons

After all cases, we will review the circumstances of the case with the local authority’s designated officer to determine whether there are any improvements that we can make to the school’s procedures or practice to help prevent similar events in the future. This will include consideration of (as applicable):

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

## 20. Managing a Disclosure

Staff at Our Place Schools are in a unique position to observe children’s behaviour over time and often develop close and trusting relationships with pupils. If a child discloses directly to a member of staff, the following procedures will be followed:

* Listen carefully to what is said
* Ask only open questions such as:

o ‘Tell me what happened.’

o ‘Please explain what you mean when you say …..’ o ‘Can you describe the person?’ or

o ‘Can you describe the place?’

* Do not ask questions which may be considered to suggest what might have happened, or who has perpetrated the abuse, e.g. ‘Did your Dad hit you?’
* Do not force the child to repeat what he/she said in front of another person;
* Do not begin an investigation – for example by asking the child to record what happened in writing or taking a photograph of any injuries;
* Report immediately to the DSL and complete a hand-written record as soon after the disclosure as possible, using the child’s words as far as possible. Use body maps to record any observed injuries Where a child discloses safeguarding allegations against another pupil in the same setting, the DSL should refer to the local procedures on the WSCB website (section 2.11) and seek advice from the Access Centre before commencing its own investigation or contacting parents where appropriate as identified in the care plan.

**21. Raising a Concern from Observation**

# Recognition of children at risk of abuse and neglect

Section 4 gives indicators of signs that a child who is experiencing abuse or neglect may demonstrate as a result of abuse. If staff are concerned about any indicators of abuse, neglect, poor practice, unsafe behaviour then they must:

* ensure the immediate safety of the child
* If in doubt- report
* raise a concern immediately to their line manager or the DSL;
* not investigate themselves as this will be coordinated by the DSL and relevant agencies;
* record the information clearly and factually on the ‘Safeguarding Concern Form’, including any relevant skin maps;
* maintain professional confidentiality and;
* request feedback when the incident has been closed.
* If the concern is about a line manager or the DSL, then the Proprietor should be informed.

If you believe the concern raised is not being addressed then seek confirmation; if you are still not satisfied that the concern is being addressed then you should contact the Local Children’s Safeguarding Board directly- Contact details are included within this policy.

**22. Roles and Responsibilities**

# Role of Designated Safeguarding Lead

The responsibilities of the Designated Safeguarding Lead are found in Annex B of “Keeping Children Safe in Education” 2022 and “Working Together to Safeguard Children” and include:

* Provision of information to the WSCP/Local Authority on safeguarding and child protection in compliance with section 14B of the Children Act 2004.
* Liaison with the Education Review Board and the Local Authority on any deficiencies brought to the attention of the Leadership Team and how these should be rectified without delay.
* Management and Referral of cases of suspected abuse to Family Front Door FFD (and/or Police where a crime may have been committed) and Disclosure and Barring Service (cases where a person is dismissed or left due to presenting risk / harm to a child).
* Liaise with the Head of Education/Care to inform them of issues.
* Understand the assessment process for providing early help and make use of the Levels of Need guidance when making a decision about whether or not the threshold for Early Help or Social Care intervention is met.
* Act as a source of support, advice and expertise within the school.
* To attend and contribute to child protection conferences and other key partnership risk management meetings when required (Signs of Safety model).
* Be alert to the specific needs of children in need, those with educational needs and young carers.
* Ensure each member of staff has access to and understands the school’s child protection policy especially new or part-time staff who may work with different educational establishments.
* Ensure all staff have induction training covering child protection and staff behaviour and are able to recognise and report any concerns immediately they arise.

* Ensure that all staff have Part 1 of “Keeping children safe in education”. Keeping detailed, accurate and secure written records of concerns and referrals; Ensure that there are resources and effective training for all staff.

Keep up to date with new developments in safeguarding by accessing briefings and journals. Attend refresher training every 2 years and face to face CSE training.

* Ensure compliance with relevant procedures and policies, for example in relation to safe record keeping and transfer.
* Carrying out, in conjunction with the Head of Education/Care and Leadership Team Safeguarding rep, an annual audit of safeguarding procedures, using the County safeguarding checklist or similar.
* Ensure that the school provides appropriate support for staff who may feel distressed when dealing with safeguarding concerns.
* Any returns requested by the LA/WSCP (e.g. s 175/157 audit, CSE audit) are completed in a timely manner to enable the WSCP to meet its statutory duties.
* DSL’s should work closely with senior mental health leads
* Training should provide DSL’s with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children’s social care
* DSL’s should help promote educational outcomes by working closely with their teachers and sharing information about their welfare, safeguarding and child protection concerns.

# Education Review Board

In accordance with the Statutory Guidance “Keeping Children Safe in Education” September 2022 and

“Working Together to Safeguard Children”, the Education Review Board will ensure that:

* Child protection/safeguarding policy, procedures and training are in place which are always effective and comply with the law. The policy is made available publicly.
* We will ensure that **all member of the Education Review Board** receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our school are effective and support the delivery of a robust whole
* The policy will be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
* We operate safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. This includes carrying out Section 128 checks on members of the leadership team and Education Review Board. Furthermore, the Head Teacher and other staff involved in the recruitment process have undertaken Safer Recruitment Training
* Procedures are in place for dealing with allegations of abuse against members of staff and volunteers/ people in a position of trust.
* There is a senior member of Our Place School leadership team who is designated to take lead responsibility for dealing with child protection (the “Designated Safeguarding Lead”) and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after school and out of term activities.
* The Designated Safeguarding Lead undertakes effective Local authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
* The Head Teacher, and all other staff and volunteers who work with children (including early years practitioners within settings on the school site), undertake appropriate training which is regularly updated (at least every year); and that new staff and volunteers who work with children are made aware of the school’s arrangements for child protection and their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education 2022). Training should include FGM/Prevent/Child Exploitation.
* Any deficiencies or weaknesses in these arrangements brought to the attention of the Governing Body and will be rectified without delay.
* The Chair of Education Review Board – Jane Spilsbury - deals with any allegations of abuse made against the Head Teacher, with advice and guidance from the Local Authority Designated Officer (LADO).
* Effective policies and procedures are in place and updated annually including a behaviour “code of conduct” for staff and volunteers - “[Professional and Personnel Relationships (safeguardingchildren.co.uk)](https://www.safeguardingchildren.co.uk/wp-content/uploads/2020/04/Guidance-For-Safer-Working-Practice-COVID-addendum-April-2020.pdf)
* Information is provided to the Local Authority (on behalf of the WSCP) when requested, for example through the Annual Safeguarding Return (e.g. section 175 audit)
* Our school Education Review Board and proprietors ensure that children are taught about safeguarding, including online safety. This as part of providing a broad and balanced curriculum.
* Our Place School contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” 2018 including providing a co-ordinated offer of Early Help for children who require this. Early Help may be offered directly through our school early help provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).
* GDPR- Our governing body and proprietors are aware that among other obligations, the [Data Protection Act 2018](https://www.gov.uk/data-protection) and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure in . [Data protection: toolkit for schools - GOV.UK (www.gov.uk)](https://www.gov.uk/government/publications/data-protection-toolkit-for-schools)
* Our Place School complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. In conjunction with the Head and DSL they should assess the level of risk within the school and put actions in place to reduce that risk

# Head of Education/Head of Care

The Head of Education and Head of Care will ensure that:

* The Safeguarding policies and procedures adopted by the Education Review Board are effectively implemented and followed by all staff.
* Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
* Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer in a timely manner.
* All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
* All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children’s Social Care (Children’s Services) or the Police.

# Multi-agency working and Early Help

* The school contributes to inter-agency working in line with statutory guidance “Working Together to Safeguard Children” 2018 including providing a co-ordinated offer of Early Help for children who require this.
* The school will be fully engaged, involved and included in local safeguarding arrangements. Once the school has been named as a relevant agency by local safeguarding partners, it will follow its statutory duty to cooperate with the published arrangements in the same way as other relevant agencies.
* The school will work with local authorities, the police, health services and other services to protect the welfare of children, through the early help process and by contributing to multi-agency plans to provide additional support.
* Our Place Group recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet the pupils needs.
* Considering the above, staff will be aware that whilst the UK GDPR and the Data Protection Act 2018 places a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in a child being placed at risk of harm.

Early Help means providing support as soon as a problem emerges, at any point in a child’s life. Any child may benefit from early help, but in particular, staff will be alert to the potential need for early help for pupils who: o Are disabled, have certain health conditions, or have specific additional needs o Have SEND, regardless of whether they have a statutory EHC plan o Have mental health needs o Are young carers

* + Show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.
	+ Are frequently missing or going missing from care, school or home. o Are at risk of modern slavery, trafficking or sexual or criminal exploitation. o Are at risk of being radicalised or exploited. o Have family members in prison, or are affected by parental offending. o Are in family circumstances presenting challenges for them, such as drug and alcohol misuse, adult mental health problems, or domestic abuse. o Misuse drugs or alcohol. o Have returned home to their family from care. o Are at risk of HBA, such as FGM or forced marriage. o Are privately fostered. o Are persistently absent from education, including persistent absences for part of the school day.
	+ Show early signs of abuse and/or neglect in other ways.

This Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).

The school complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. In conjunction with the Head and DSL they should assess the level of risk within the school and put actions in place to reduce that risk.

## 23. Safer Recruitment

Our Place Group has a written recruitment and selection policy statement and procedures linking explicitly to this policy. The statement is included in all job advertisements, publicity material, recruitment websites, and candidate information packs.

The recruitment process is robust in seeking to establish the commitment of candidates to support the school’s measures to safeguard children and to identify, deter or reject people who might pose a risk of harm to children or are otherwise unsuited to work with them. All staff working within our school who have substantial access to children have been checked as to their suitability, including verification of their identity, references, qualifications and a satisfactory barred list check, enhanced DBS check and a right to work in the UK. Our Education Review Board are subject to an enhanced DBS check without barred list check, in line with Worcestershire recommendation.

The school maintains a single central record of recruitment checks for audit purposes. Any member of staff working in regulated activity prior to receipt of a satisfactory DBS check will not be left unsupervised and will be subject to a risk assessment.

Volunteers who are not working in regulated activity will be supervised at all times. DSL’s and selected other staff involved in recruitment and interviewing have completed NSPCC ‘Safer Recruitment Training’ and at least one person interviewing for any position will have completed this training.

# Single Central Record (SCR)

The school keeps an SCR which records all staff, including agency and third-party staff who work in the school. All members of the proprietary body (Education Review Board) are also recording on the SCR.

The following information is recorded on the SCR:

1. An identity check.
2. A barred list check.
3. An enhanced DBS check.
4. A prohibition from teaching check (where required).
5. A check of professional qualifications.
6. A check to determine the individual’s right to work in the UK.
7. Additional checks for those who have lived or worked outside of the UK.
8. A section 128 check for those in management positions.

For agency and third-party staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that the necessary checks have been conducted and the date that confirmation was received.

If any checks have been conducted for volunteers, this will also be recorded on the SCR. If risk assessments are conducted to assess whether a volunteer should be subjected to an enhanced DBS check, the risk assessment will be recorded. The school is free to record any other information it deems relevant. The details of an individual will be removed from the SCR once they no longer work at the school.

**Appointing new staff**

When appointing new staff, we will:

* Verify their identity (KSCIE 22 Paragraph 231 - Best practice is checking the name on their birth certificate
* Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
* Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
* Verify their mental and physical fitness to carry out their work responsibilities
* Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff’s employment and for 2 years afterwards
* Verify their professional qualifications, as appropriate
* Ensure they are not subject to a prohibition order if they are employed to be a teacher
* Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
* Secretary of State section 128 directionA section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. An individual who is subject to a section 128 direction is unable to:
	+ take up a management position in an independent school, academy, or in a free school as an employee.
	+ be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or
	+ be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
	+ A person subject to a section 128 direction is also disqualified from holding or continuing to hold office as a governor of a maintained school
* Ask for written information about previous employment history and check that information is not contradictory or incomplete.
* Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (August 2018).

We will seek references on short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

**Regulated activity** means a person who will be:

* Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children
* Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
* Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

**Existing staff**

If we have concerns about an existing member of staff’s suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

**Agency and third-party staff**

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

**Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

**Trainee/student teachers**

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

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

**Volunteers**

We will:

* Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
* Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
* Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
* Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

**Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in schools or colleges (set out in paragraphs 213). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK’s exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world

**Governance (Education Review Board members)**

• All members of the governance will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.

Where the ‘harm test’ is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant) or Where the individual has received a caution or conviction for a relevant offence:
If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009 Where the ‘harm test’ is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)

* Where the individual has received a caution or conviction for a relevant offence
* If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
* If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not i.e. Where the ‘harm test’ is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant.)

## 24. Records, Monitoring and Transfer

Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school. The record should include the child’s words as far as possible and should be timed, dated and signed. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies. Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

Child protection records are stored securely, with access confined to specific staff, e.g. Designated

Safeguarding Leads and the Head of Education/Head of Care. Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals (e.g. child who repeatedly goes missing) and ensuring these are acted upon. Each stand - alone file should have a chronology of significant events. When children transfer school, their safeguarding records are also transferred **within 5 days**. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving education/care setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, should be copied.

A record of any allegations (proven) made against staff is kept in a confidential file by the Head of Education/Head of Care.

# Monitoring and Evaluation

Our Safeguarding Children policy and procedures will be monitored and evaluated by:

* Completion of the annual safeguarding audit;
* Completion and return to the LA of the annual safeguarding report to Education review Board;

Quality monitoring surveys and questionnaires;

* Discussions with children and staff;
* Scrutiny of data and risk assessments;
* Scrutiny of the school’s single central record of recruitment checks;
* Scrutiny of Committee meeting minutes;
* Monitoring of logs of bullying/ racism/ behaviour incidents and Physical Intervention5 records; - Supervision of staff involved in child protection; - Case file audits undertaken by the DSL.

## 25. Information Sharing and Confidentiality

We recognise the importance of information sharing between practitioners and local agencies. We have ensured arrangements are in place that set out clearly the processes and principles for sharing information within our school/college and with WCF children’s social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

In our school our staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children’s social care.

Our Place School are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

This includes:

* We are confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is treated as ‘special category personal data’.
* understanding that ‘safeguarding of children and individuals at risk’ is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

When children transfer from our school, the safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, will be copied.

## 26. Communication with Parents

We recognise that good communication with parents is crucial in order to safeguard and promote the welfare of children effectively. We will always undertake appropriate discussion with parents, where appropriate as identified in the care plan, prior to involvement of another agency unless to do so would place the child or an adult at further risk of harm or would impede a criminal investigation.

We will ensure that parents have an understanding of the responsibilities placed on the school and staff to safeguard children and their duty to co-operate with other agencies in this respect.

## 27. Photography and use of Images

The welfare and protection of our children is paramount and consideration should always be given to whether the use of photography will place our children at risk.

Images may be used to harm children, for example as a preliminary to ‘grooming’ or by displaying them inappropriately on the internet, particularly social networking sites.

For this reason consent is always sought when photographing children and additional consideration given to photographing vulnerable children, particularly Looked After Children.

Consent must be sought from those with parental responsibility (this may include the Local Authority in the case of Looked After Children).

## 28. Links to other Policies

* Child Sexual Exploitation Policy
* Complaints Policy
* Behaviour Management Policy
* Anti-Bullying Policy
* Physical Intervention Policy
* Administration of Medicines and First Aid Policy
* Health and Safety Policy
* Lone Working Policy – - Intimate and Personal Care
* Relationship and Sexual Relationships Education Policy
* Equal Opportunities Policy
* Online Safety Policy
* Whistleblowing Policy
* Child on child Abuse Policy
* Educational Visits Policy
* Safer Recruitment and Selection Policy

## 29. Useful Contacts

**Referring to Children’s Social Care, Children’s Social Work Services:**

The Family Front Door, Initial Contact and Referral Team is the central point for all referrals for children and young people aged 0 to 18 years and living in Worcestershire where there is safeguarding or child protection concerns for them.

This team receives referrals from professionals, members of the community, family members, children and young people directly. Please contact the Family Front Door directly telephone 01905 822666. If you have a child protection concern outside of normal office hours please contact our out of hours emergency duty team (EDT) telephone 01905 768020.

If you have an immediate concern about the safety and welfare of a child please phone the Family Front Door directly on: 01905 822666. You will be required to submit the information on a referral form following this as per the WLSCB procedure.

Link to Position of Trust Referral Form

[http://www.worcestershire.gov.uk/info/20559/refer\_to\_childrens\_social\_care/1659/are\_you\_worried\_about \_an\_adult\_who\_works\_with\_children](http://www.worcestershire.gov.uk/info/20559/refer_to_childrens_social_care/1659/are_you_worried_about_an_adult_who_works_with_children)

**Who can I contact if I have a concern?**

For advice and information about allegations against staff and volunteers; the LADO Team can be contacted on Telephone: 01905 846221

Initial contact to be made via the above Duty Number. The Duty LADO can help you with any concerns you have.

All statutory partner agencies are required to report all allegations to the LADO within one working day. Referrals should be submitted through the portal if the threshold for LADO procedures is met.

Safeguarding Report Form 1

|  |  |
| --- | --- |
| **Date:**  | **Time:**  |
| **Your Name:**  | **Your Position:**  |
| **Place of Work:**  | **Contact Number:**  |
| **About the Young Person**  |
| **Young Person Name:**  | **YP’s DOB:**  |
| **Details of the Allegations / Suspicions**  |
| **Are you reporting:** * **Disclosure made from a child or young person**
* **Disclosure or suspicion from a third person**
* **Your suspicion or concern**
 |
| **Date and Time of Disclosure:**  |
| **Date and Time of Incident:**  |
| **Details of allegations, suspicion, or concern: (State exactly what you were told/observed, use the person words were possible, it must be fact and not your feelings)**  |
| **Names of any Witnesses:**  |
| **Staff Signature:**  |
| **Management Response and Action:**  |
| **Date and Time received:**  |
| **Date and Time passed to DSL:**  |
| **Date and Time informed Safeguarding Team:**  |
| **Safeguarding Log Number:**  |

**Safeguarding Report Form 2**

**DSL Response and Actions**

|  |  |  |
| --- | --- | --- |
| **Date received Report Form 1:**  | **Time Received Report Form 1:**  |  |
| **DSL Name:**  |  |
| **Place of Work:**  |  |
| **Safeguarding Log Number:**  |  |
| **About the Young Person**  |  |
| **Young Person Name:**  | **YP’s DOB:**  |  |
| **Is Skin Map required?:**  | **YES / NO**  |  |
| **DSL Checklist**  | **YES**  | **NO**  |
| **Is the Young Person at risk?:** (If NO continue to keep them safe; if YES make them safe from harm now)  |   |   |
| **Has a Criminal Act been committed?** (If YES, then the Police need to be informed)  |   |   |
| **Has this been reported to the Safeguarding Team?**  |   |   |
| **Acknowledgement Letter been sent to Staff?**  |   |   |
| **Has the Local Authority been informed?**  |   |   |
| **Where appropriate have parents been informed?**  |   |   |
| **Has LADO been informed?**  |   |   |
| **Have you started a Case Log of Events?**  |   |   |
| **Has Ofsted been notified?** Ofsted Case Number:  |   |   |
| **Have you got written Statements?**  |   |   |
| **Overview of Action and response of DSL (in connection with Case Log of Events)** **DSL Signature:**  |  |
| **Conclusion:**  |  |
| **Does the Outcome require notification to DBS**  | **YES**  | **NO**  |
| **Date completed:**  |  |
| **Date closed:**  |  |

Safeguarding Report Form 3

**Case File Log of Events**

|  |  |
| --- | --- |
| **Y P Name:**  | **Safeguarding Log No:**  |

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Date**  | **Time**  | **Summary of Events**  | **Evidence**  | **Initials**  |
|   |   |   |   |   |
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# Safeguarding Report Form 4 Skin Map

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Young Person Name:**  | **Date:**  |  | **Time:**  | **Safeguarding Log No:**  |
| **Person completing Skin Map:**  |  |   |  |

|  |  |  |
| --- | --- | --- |
|  |

|  |
| --- |
| **Description of Injury** Ensure you describe size, colour, shape  |

 |