

Malvern Wyche C of E Primary School

Together We Soar



Safeguarding & Child Protection Policy

2024-2025

Signature  (Chair of Governors) Name Dan Eglin

Ratified by the Full Governing Board 18th September 2024

By living and learning together through our Christian values of **Safety**, **Trust**, **Respect**, **Inspiration**, **Value** & **Engagement**, with God's help, we will support each other to "soar", lifting hearts and broadening horizons, so that by giving our best today, the world may be better tomorrow.

They will soar on wings like eagles Isaiah 40:31

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated Safeguarding Lead (DSL) Designated Teacher for Children in Care	Stephen Murphy	email: head@wyche.worcs.sch.uk Telephone: 01684 573205
Deputy DSL GET SAFE Lead Mental Health Champion	Sam Baylis	email: sjb140@wyche.worcs.sch.uk Telephone: 01684 573205
Deputy DSL Behaviour & Prevent Lead	Ruth Charles	Email rcharles@wyche.worcs.sch.uk
Local authority designated officer (LADO)	Jon Hancock (and duty team)	01905846221 For agencies excluding schools: mailto:LADO@worcschildrenfirst.org.uk For schools: Children's Services Portal - https://www.worcestershire.gov.uk/csp
Chair of governors	Dan Eglin	d.eglin@wyche.worcs.sch.uk
Safeguarding Governor	Ellie Wilson	e.wilson@wyche.worcs.sch.uk
Channel Chair	Paul Kinsella	020 7340 7264
Children's Services	Family Front Door	01905 822666 (core working hours) 01905 768020 (out of hours or at weekends)
Online safety co-ordinator	Gren Wilson	g.wilson@wyche.worcs.sch.uk
Safeguarding in Education Adviser, WCF	Denise Hannibal	dhannibal@worcestershire childrenfirst.org.uk

1. Aims

The school aims to ensure that:

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

2. Safeguarding Statement

2.1 Malvern Wyche C of E Primary School is committed to safeguarding and promoting the welfare of children and young people and expects all staff, visitors and volunteers to share this commitment.

2.2 At Malvern Wyche C of E Primary School, our motto is "Together We Soar!" In this Church of England school, inspired by Isaiah 40:31, we want children to "soar on wings like eagles" experiencing freedom and opportunity in their lives, today and tomorrow. This vision is underpinned by our STRIVE values: Safety, Trust, Respect, Inspiration, Value and Engagement, all of which properly exemplified and lived will make The Wyche and its community safer and more likely to flourish.

2.3 The Wyche is committed to providing an environment where children feel safe and are safe, where the adults with a duty of care and in a position of trust listen and are vigilant to safeguard pupil and staff health and wellbeing and where the right steps are taken promptly to protect pupils at risk of, or experiencing, harm swiftly, effectively and without fear or favour.

2.4 We not only have a culture of promoting safeguarding underpinned by regular quality training, consistent raising of awareness and clear internal reporting systems, but have a robustly planned curriculum which educates children about risk, hazard, potential harm and abuse in an inclusive and age-appropriate way, teaching ways to be safe, stay safe, and get help, developed in consultation with all stakeholders.

2.5 We work closely with families, offering support where it is needed through a well-planned early help offer and maintaining an open door and listening ear policy. We are unafraid to challenge where it is our duty and work in partnership with families and wider services to secure, in partnership, the safety and wellbeing of children.

2.5 Malvern Wyche C of E Primary School's Safeguarding Child Protection Policy draws upon and fulfills 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 2023](#), the DfE's statutory Guidance - [Keeping Children Safe in Education September 2024](#)

3. Legislation and statutory guidance

3.1 This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education \(2024\)](#) and [Working Together to Safeguard Children 2023](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners (see 4.7)

3.2 This policy is also based on the following legislation:

- a) Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

- b) [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least 1 person conducting an interview to be trained in safer recruitment techniques
- c) [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- d) 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
- e) [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- f) [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- g) Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- h) [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- i) [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights](#) (ECHR)
- j) [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- k) [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- l) The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- m) This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

4. Definitions

4.1 Safeguarding and promoting the welfare of children means:

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

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

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

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

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

4.6 "Children" includes anyone under the age of 18, emphasising the prominence of exploitation, adultification and teenage relationship abuse.

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

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

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

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

5. Equality statement

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

5.2 We give special consideration to children who:

- a) Have special educational needs and/or disabilities (SEND) or health conditions (see section 11)
- b) Are young carers
- c) May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- d) Have English as an additional language
- e) Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- f) Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- g) Are asylum seekers
- h) Are at risk due to either their own or a family member's mental health needs

- i) Are looked after (LAC, also known as ‘fostered’) or previously looked after (PLAC – also known as ‘adopted’.) (see section 13)
- j) Are missing or absent from education for prolonged periods and/or repeat occasions
- k) Whose parent/carer has expressed an intention to remove them from school to be home educated

6. Roles and responsibilities

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

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

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

6.3 All staff

6.31 All staff will:

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

6.32 All staff will be aware of:

- a) Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy DSL, the behaviour lead and respective policy, the online safety and acceptable use policy and the safeguarding response to children who go missing from education.

- b) The early help assessment process (sometimes known as the common assessment framework or) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- c) The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- d) What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- e) The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- f) The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- g) The fact that children can be at risk of harm inside and outside of their home, at school and online
- h) The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBTQ+) can be targeted by other children.
- i) What to look for to identify children who need help or protection

6.33 A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm, however, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

6.34 However, the Cass review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

6.35 It recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

6.36 As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

6.37 Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

6.38 In addition staff are aware of:

- a) [West Midlands Safeguarding procedures](#): led by the statutory safeguarding partners/organisations: local authorities, clinical commissioning groups and the police.
- b) [WCF Levels of Need threshold](#), a document intended to assist professionals to make decisions about how to respond to the needs of the children, young people and families they are in contact or working with,

acknowledging that every child and family are unique, and their needs should be considered on a case-by-case basis and decisions made using professional judgement, supported by this guidance.

6.39 Training and awareness

All staff receive appropriate safeguarding and child protection training (including online safety) at induction, which is regularly updated, including 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.

6.4 The designated safeguarding lead (DSL)

6.41 The DSL is a member of the senior leadership team. Our DSL is the headteacher Mr Stephen Murphy. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

6.42 During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of hours members of staff may contact the DSL by phone and may still make referrals to the school's safeguarding log.

6.43 When the DSL is absent, the deputy DSL, Mrs Sam Baylis will act as cover.

6.44 In the unlikely event that the DSL and Deputy are not available, staff should seek advice through the Worcestershire Family Front Door or through the education safeguarding advisory service, using the contact details at the beginning of this document. Not being able to contact DSLs is no excuse for failing to act upon safeguarding concerns.

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

- a) Provide advice and support to other staff on child welfare and child protection matters
- b) Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- c) Contribute to the assessment of children
- d) Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- e) Have a good understanding of harmful sexual behaviour
- f) Have a good understanding of the filtering and monitoring systems and processes in place at our school

6.46 The DSL will also:

- e) Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- f) Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- g) Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- h) Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search
- i) Report trends and data to governors in a generalised and appropriately anonymised fashion.

The full responsibilities of the DSLs are set out in their job description.

6.5 The governing board

They will soar on wings like eagles Isaiah 40:31

6.51 The governing board will:

- a) Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- b) Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- c) Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- d) Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board.
- e) Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners
- f) Ensure that the school has appropriate filtering and monitoring systems in place, and review their effectiveness. This includes:
 - i. Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - ii. Reviewing the [DfE's filtering and monitoring standards](#), and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards
- g) Make sure:
 - i. The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
 - ii. Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
 - iii. The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place
 - iv. The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
 - v. That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- h) Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
 - i. Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
 - ii. Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
 - iii. Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

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

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

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

6.6 The headteacher

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

- a) Ensuring that staff (including temporary staff) and volunteers:
 - i. Are informed of our systems which support safeguarding, including this policy, as part of their induction
 - ii. Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- b) Communicating this policy to parents/carers when their child joins the school and via the school website
- c) Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- d) Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- j) Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this.
- k) Ensuring the relevant staffing ratios are met, where applicable.
- l) Overseeing the safe use of technology, mobile phones and cameras in the setting.

6.7 Virtual school heads

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

6.72 They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

7. Confidentiality

7.1 Malvern Wyche C of E Primary School understands that under GDPR legislation personal data information related to be it known, verbalised or recorded, is protected by law and will have due regard to this legislation. We are also aware that matters of children's and family's welfare, including child protection are by definition of a sensitive nature and must be treated as confidential whilst being acted upon appropriately in a timely manner.

7.2 We know, and act upon the premise that:

- a) Timely information sharing is essential to effective safeguarding
- b) Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- c) The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe (see the [DfE Data Protection for schools guidance document.](#))
- d) If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- e) Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- f) If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- i. There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- ii. The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- iii. The DSL should consider that:
 - o Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - o The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
 - o Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

7.3 Regarding anonymity, all staff will:

- a. Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
- b. Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
- c. Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- g) The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- h) If staff are in any doubt about sharing information, they should speak to the DSL (or deputy).

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

8. Recognising abuse and taking action

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

8.11 Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. [NB in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".]

8.12 Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.** Contact details are at the head of this policy.

8.13 Tell the DSL (see 6.4) as soon as possible if you make a referral directly.

8.14 Child protection referrals should be made to Children's Services through the "Family Front Door" on **01905 822666** (core working hours) and **01905 768020** (out of hours or at weekends) in the first instance. Web-referrals may be made through the Children's Services Portal <https://www.worcestershire.gov.uk/childrens-social-care/refer-childrens-social-care> .

8.15 Advice may be sought from the Education safeguarding Advisor Denise Hannibal on 01905844436 07825531295 or at dhannibal@worcchildrenfirst.org.uk

8.16 If there are barriers to making a referral, child protection charities can offer assistance, (the [NSPCC Helpline](#) is a good example) as can the government’s page here: <https://www.gov.uk/report-child-abuse-to-local-council>

8.2 If a child makes a disclosure to you

8.21 If a child discloses a safeguarding issue to a member of staff

Staff will:	Staff will not :
<ul style="list-style-type: none"> a) Listen to them and take what they say seriously b) Allow them time to talk freely, prompting, exploring and clarifying exploring with open questions (how, when, why, where, who, what?) c) Stay calm and professional d) Tell the child they have done the right thing in telling you. e) Explain what will happen next and that you will have to pass this information on. f) Write up your conversation as soon as possible in the child’s own words, sticking closely to the facts, even if they are unclear. g) Ensure disclosures are logged electronically on My Concern and the DSL is notified the same day. h) Where My Concern is unavailable, sign and date the write-up and pass it on to the DSL, treating it as sensitive material. i) Maintain the confidentiality of the disclosure, discussing it only with the DSL and any members of staff the DSL deems need to be informed on a need-to-know basis. j) Where appropriate, make a referral to children’s social care and/or the police directly (see section 8), and tell the DSL as soon as possible that you have done so. 	<ul style="list-style-type: none"> a) Talk too much, preventing the child from speaking fully and freely b) Ask leading questions, make suggestions or speculate aloud. c) Express shock, disapproval, disgust, upset or anger. d) Ask why they did not tell us sooner e) Promise to keep it a secret f) Elaborate, exaggerate or embellish a disclosure. g) Pass judgement or record assumptions and opinions. h) Dismiss, ignore or fail to pass on any disclosures which indicate a child may be at risk or suffering abuse. i) Unless instructed to by a relevant authority (DSL or representative of external partners) discuss the matter with anybody who is not entitled to know for the purposes of safeguarding, including their own colleagues, family and friends.

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

8.3 If staff discover that FGM has taken place or a pupil is at risk of FGM

8.31 Keeping Children Safe in Education explains that FGM (Female Genital Mutilation) comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

8.33 Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 2 of this policy.

8.34 Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions should they fail to meet it.

8.36 Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

8.39 Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out should speak to the DSL and follow our local safeguarding procedures. Worcestershire guidance can be found here [Worcestershire FGM Pathway](#).

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

8.41 Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare. Where possible, speak to the DSL first to agree a course of action.

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

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

8.44 Early help assessment

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

- a) is disabled or has certain health conditions and has specific additional needs
- b) has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- c) has a mental health need
- d) is a young carer
- e) is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- f) is frequently missing/goes missing from education, home, or care,
- g) has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit.
- h) is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- i) is at risk of being radicalised or exploited

- j) has a parent or carer in custody, or is affected by parental offending
- k) is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- l) is misusing alcohol and other drugs themselves
- m) is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- n) is a privately fostered child.

8.46 If an early help assessment is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

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

8.49 In Worcestershire we make early help assessments using an assessment template provided by our local Safeguarding Partnership. [Early Help Assessments](#)

8.48 Referral

8.49 If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 8), you must tell the DSL as soon as possible.

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

8.51 If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves. Worcestershire has an escalation policy which is available here [Escalation Policy: Resolution of Professional Disagreements](#)

8.5 If you have concerns about extremism

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

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

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

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

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

- a) Think someone is in immediate danger
- b) Think someone may be planning to travel to join an extremist group

c) See or hear something that may be terrorist-related

8.6 If you have a concern about mental health

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

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

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

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

8.65 Where DSLs are aware of a potential mental health problem in pupils we will liaise where appropriate with parents and carers and manage referrals to CAMHS. We may also provide pastoral care or therapeutic interventions in school within our own remit. School will never diagnose mental health problems nor suggest or attempt treatment but liaise with qualified professionals to and act accordingly on advice and recommendations.

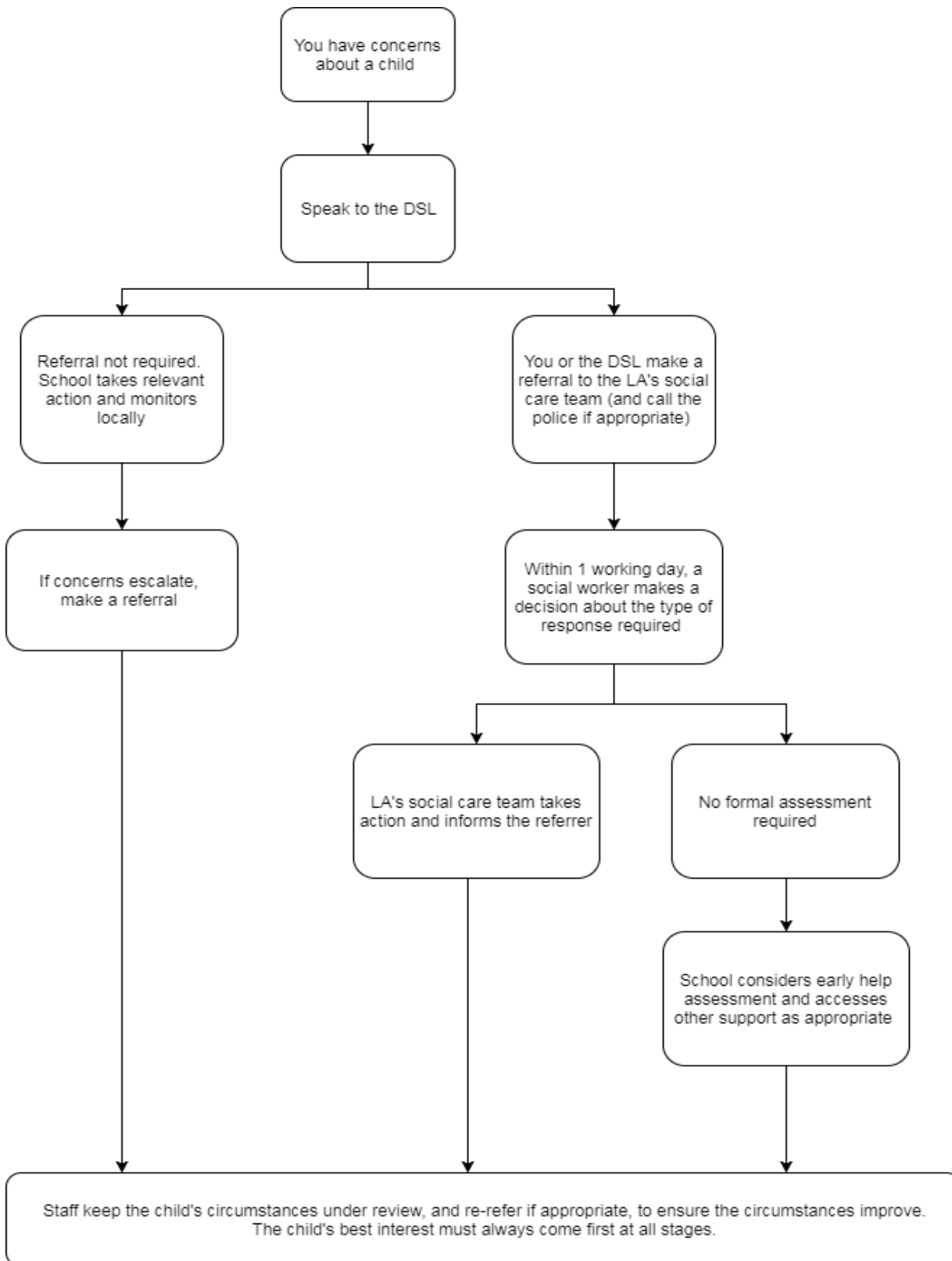
8.66 As with any other health condition school will understand the need for pupils with a mental health condition to attend appointments and approve these absence. Likewise school will make its best efforts to accommodate and make welcome any visiting mental health professionals who wish to carry out assessment and treatment in school where appropriate.

8.67 The school's DSL and Deputy DSL both received training in mental health awareness and promotion and the school's SENDCo in Trauma informed practice. All of this training forms the basis of policy writing and the development of a safe and inclusive ethos designed to promote our vision that "Together We Soar".

8.68 The school has due regard to the Department for Education guidance on [mental health and behaviour in schools](#) as it responds to this need in children and develops school based policy.

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

(Note – if the DSL is unavailable, this should not delay action. See section 8 for what to do.)



8.7 Concerns about a staff member, supply teacher, volunteer or contractor

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

risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

8.72 The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate. Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

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

8.8 Allegations of abuse made against other pupils

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

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

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

(See appendix 2 for more information about child-on-child abuse.)

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

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

- a) You must record the allegation and tell the DSL, but do not investigate it
- b) The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- d) The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

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

8.85 We have a separate Child on Child Abuse policy, ratified by governors and written in collaboration with local Safeguarding Partners which can be found in the policies section of the website.

<https://www.wyche.worcs.sch.uk/policies>

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

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

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

8.87 The DSL will take the lead role in any disciplining of the alleged perpetrator(s), consulting with partners where appropriate. We will provide support at the same time as taking any disciplinary action.

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

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

8.89 In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the local early help process is and how and where to access support. More information on early help is set out in Part one of this guidance with full details of the early help process in [Working together to safeguard children - GOV.UK \(www.gov.uk\)](http://www.gov.uk)

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

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

8.92 Staff **must not**:

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

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

Initial review meeting

8.94 Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

- a) Whether there is an immediate risk to pupil(s)
- b) If a referral needs to be made to the police and/or children's social care

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

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

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

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

Further review by the DSL

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

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

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

Informing parents/carers

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

Referring to the police

8.911 If it is necessary to refer an incident to the police, this will be done through Priory & Malvern Wells local neighbourhood police with whom we work closely. DSLs may choose to telephone officers directly, use the West Mercia Police portal or dial 101.

Recording incidents

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

Curriculum coverage

8.913 Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Relationships and Sex Education, and Personal, Social, Health & Economic Education curriculum, in an age-appropriate way, across the strands “Me & My Relationships” and “Keeping Myself Safe” through SCARF materials. ([see RSE/PSHE Curriculum](#)) and in Online Safety assemblies and computing lessons. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- a) What it is
- b) How it is most likely to be encountered
- c) The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
- d) Issues of legality
- e) The risk of damage to people’s feelings and reputation
- f) Pupils also learn the strategies and skills needed to manage:
 - g) Specific requests or pressure to provide (or forward) such images
 - h) The receipt of such images

8.914 This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

8.10 Reporting systems for our pupils

8.101 Where there is a safeguarding concern, we will take the child’s wishes and feelings into account when determining what action to take and what services to provide. We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

8.102 To achieve this, we will:

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

8.103 Our first Christian value is *Safety* and through living and exploring these values, in assemblies, classrooms and relationships, staff make clear that

- a) If a child feels unsafe and does not like what is happening to them, or
- b) if a child feels this way about someone they know,
they should tell a trusted adult immediately.

8.104 Other procedures in place to encourage reporting are:

- a) When we teach RSE with any sexual or safeguarding context we allow children to write or ask questions in advance.
- b) Children who we consider to be vulnerable learners build, a relationship with our pastoral staff which gives them an enhanced opportunity to disclose or ask for help.
- c) The school endorses and clearly displays Childline posters and covers this in assembly.
- d) The school puts a online safeguarding element in its weekly letter to parents.

9. Online safety and the use of mobile technology

9.1 In school we use Smoothwall to filter and monitor our internet and IT network. This is installed and maintained by our Infrastructure provider Chestnut Services Ltd. who monitor in the first instance and report infringements to the headteacher and deputy headteacher for their response and action according to this policy.

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

9.3 To address this, our school aims to:

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

The 4 key categories of risk

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

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

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

- a) Educate pupils about online safety in collective worship, and as part of our planned curriculum. For example:
 - i. The safe use of social media, the internet and technology
 - ii. Keeping personal information private
 - iii. How to recognise unacceptable behaviour online
 - iv. How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they're a witness rather than a victim
- b) Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. (All staff members will receive refresher training as required and at least once each academic year.)
- c) Educate parents/carers about online safety via our website and in weekly bulletins, and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety.
- d) Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- i. Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
 - ii. Staff will not take pictures or recordings of pupils on their personal phones or cameras
- e) Make all staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology,
 - f) Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones ,
 - g) Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
 - h) Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
 - i) Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
 - j) Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively
 - k) Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website at <https://www.wyche.worcs.sch.uk/policies>

Digital Devices

9.6 We make good use of a range of digital and internet-enabled devices in school. These are monitored and maintained by our IT service Privier Chestnut and their use is supervised. Internet access is monitored and filtered by Smoothwall and logs on this software which give cause for concern are reported to the DSL for action.

9.7 We do not allow pupils to bring into school, or on an offsite trip, any digital device which is either internet enabled, or can make recordings, because of the safeguarding risks this presents. On the rare occasions where parents wish their child to have a mobile phone for security, or after-school contact, this can be kept securely in the office during the school day, between 8.55am and 3.25pm.

9.8 Prohibited devices, if found in school, will be confiscated by a member of staff, held in safekeeping and handed to the parent at the end of the day.

9.9 Whilst we will make our best efforts to safeguard private property, we admit no liability for damage or loss occurring to digital devices which are the personal property of children or families brought into school in contravention of this policy, without the prior knowledge of the school.

Minimising the risk of the misuse of images of children

9.10 It is important that images of children, when made to gather evidence or record successes, are treated as sensitive material and protected data.

9.11 Where devices are used by staff, including early years practitioners, to record audio, stills or video of children, they will be school devices only. Personal devices of any kind may not be used in curriculum teaching or assessment.

9.12 Staff will have due regard to consents gathered by school from parents and will not make images or record children who do not have these permissions.

9.13 School devices must be password protected and the misuse, mislaying or loss of these must be reported to the headteacher immediately.

9.14 Images may be stored in school network cloud but not in personal clouds or storage. Audio and video should be edited on school laptops which are password protected. Only employees of the school may access these laptops. Images and videos of children must not be stored on the hard drives of personal devices in the home.

9.15 Pen drives or “memory sticks” **must not** be used to store or transport data of any kind.

9.2 Artificial intelligence (AI)

9.21 Generative artificial intelligence (AI) tools are now widespread and easy to access. Staff, pupils and parents/carers may be familiar with generative chatbots such as ChatGPT and Google Bard.

9.22 Malvern Wyche C of E Primary School recognises that AI has many uses, including enhancing teaching and learning, and in helping to protect and safeguard pupils. We do not use AI as a teaching tool and will work with external partners, including the DfE to offer best practice advice on its use where relevant.

9.23 As AI may also have the potential to facilitate abuse (e.g. bullying and grooming) and/or expose pupils to harmful content. For example, in the form of 'deepfakes', where AI is used to create images, audio or video hoaxes that look real.

9.24 Malvern Wyche C of E Primary School will treat any use of AI to access harmful content or bully pupils in line with this policy and behaviour policy.

9.25 Staff should be aware of the risks of using AI tools whilst they are still being developed and should carry out risk assessments for any new AI tool being used in planning or resourcing. The school does not use AI in teaching and learning. Staff considering using AI should discuss this with the Headteacher.

10. Notifying parents or carers

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

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

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

10.4 In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children’s social care to make sure our approach to information sharing is consistent.

10.5 The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

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

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

11.1 We recognise that pupils with SEND or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- a) Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- b) Pupils being more prone to peer group isolation or bullying (including discriminatory bullying) than other pupils
- c) The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- d) Communication barriers and difficulties in managing or reporting these challenges

11.2 We offer additional pastoral support for these pupils. This includes:

- a) Referral to our pastoral TA for a range of support and interventions
- b) THRIVE assessments and action plans to help with recovery and regulation
- c) A drop-in session for children struggling with socialising, communication etc.

11.3 Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO. Further information can be found in the following documents:

- a) [SEND code of practice: 0 to 25 years - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/send-code-of-practice-0-to-25-years)
- b) [Supporting pupils with medical conditions at school - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/supporting-pupils-with-medical-conditions-at-school)

And from specialist organisations such as:

- a) The Special Educational Needs and Disabilities Information and Support Services (SENDIASS). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND. All local authorities have such a service: [Find your local IAS service \(councilfordisabledchildren.org.uk\)](https://www.councilfordisabledchildren.org.uk)
- b) <https://www.mencap.org.uk/> - - Represents people with learning disabilities, with specific advice and information for people who work with children and young people
- c) [Children with special educational needs and disabilities \(SEND\) | NSPCC Learning](https://www.nspcc.org.uk/learn/children-with-special-educational-needs-and-disabilities-send/)
 - a. and
- d) [Safeguarding d/Deaf and disabled children and young people | NSPCC Learning](https://www.nspcc.org.uk/learn/safeguarding-d/deaf-and-disabled-children-and-young-people/)

12. Pupils with a social worker

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

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

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

- a) Responding to unauthorised absence or missing education where there are known safeguarding risks,
- b) The provision of pastoral and/or academic support

- c) Trends in a child's behaviour and safety in school, including if at risk of exclusion
- d) External interventions and services being accessed, with the attendant risk assessments and reduction measures
- e) Any disclosures or subsequent concerns.

13. Looked-after and previously looked-after children

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

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

13.2 We have appointed a designated teacher, Stephen Murphy who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

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

13.4 As part of their role, the designated teacher will:

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

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3). We will follow local procedures and after a risk assessment based on the facts as they are known, will seek guidance from the Local Area Designated Officer (LADO) and follow the guidance provided. Complaints about the head teacher must be made to the Chair of Governors, Dan Eglin at D.Eglin@wyche.worcs.sch.uk

14.2 Other complaints

Where complaints do not relate to the conduct of staff but to the arrangements for health and safety (such as premises or supervision) complainants will be directed to the complaints policy, available on the website. If it becomes apparent that a child has suffered harm as a result of this, the headteacher may decide to consult any or all of children's social care, the local authority safeguarding advisor or local authority legal services for guidance and quality assurance. If the allegation or complaint is about the headteacher, the complaint should be directed to the chair of governors.

14.3 Whistle-blowing

14.31 Whistle-blowing means the expectation that staff will raise concerns about any aspect of safety or professionalism they believe to be a risk to any stakeholder. We have a separate, dedicated Whistleblowing Policy, available to staff and displayed on the Wyche website.

15. Record-keeping

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

15.2 Safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. We use My Concern software to record ongoing information relevant to safeguarding.

15.3 Records will include:

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

15.4 Concerns and referrals will be kept in a separate child protection file for each child, stored digitally in the My Concern software.

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

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

15.7 If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.

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

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

15.9 In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

15.10 Further information about record-keeping:

- a) Records are kept, wherever possible on an electronic database *My Concern*.
- b) Paper records (letters, drawings, disclosure notes, etc.) which need to be retained are scanned into this database then the hard copies shredded.
- c) Records are kept secure by password protection to the system for logging or viewing relevant concerns and access control for users that only DSLs can view all records. DSLs who have full access to records use TFA (Two Factor Authentication).
- d) Where staff have need to access and view records (such as those they have created themselves of records relevant to their care of vulnerable children) they can be granted access.
- e) Whilst all staff can log concerns, they can only view data to which they have been invited based on the judgement of the DSL.
- f) Information will be retained in line with our document retention schedule and local guidance.

15.11 Where relevant school will share information with safeguarding partners (health, police and children's service). This will be done on a case-by-case basis, where it is in the interest of the child. Staff are mindful that GDPR legislation is not a barrier to safeguarding and will share information and co-operate with authorised partners promptly in order to secure the safety of children and families.

15.12 In addition:

Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

16. Training

15.1 All staff

15.11 All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

15.12 This training will be regularly updated and will:

- a) Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- b) Be in line with advice from the 3 safeguarding partners
- c) Include online safety, including an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring
- d) Have regard to the Teachers' Standards to support the expectation that all teachers:
 - i. Manage behaviour effectively to ensure a good and safe environment
 - ii. Have a clear understanding of the needs of all pupils

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

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

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

15.16 Volunteers will receive a safeguarding induction and orientation and, where relevant and applicable, appropriate training.

15.2 The DSL and deputy DSL

15.21 The DSL and deputy will undertake child protection and safeguarding training annually.

15.22 In addition, they will update their knowledge and skills at regular intervals throughout each school year and at least annually (for example, through e-bulletins, webinars, county and local DSL network meetings, meeting other DSLs, DSL refresher training, GET SAFE training and taking time to read and digest safeguarding developments).

15.23 They will also undertake Prevent awareness training.

15.3 Governors

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

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

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

15.4 Recruitment – interview panels

15.4 At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures. We use Safer Recruitment Training provided by The Key for Safeguarding. The headteacher and Safeguarding Governor are safer recruitment trained.

15.5 See our Safer Recruitment Policy (available on our website) for more information about our safer recruitment procedures.

15.5 Staff who have contact with pupils and families

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

16. Monitoring arrangements

This policy will be reviewed **annually** by Stephen Murphy as DSL. At every review, it will be presented to the Pastoral & Ethos committee for scrutiny then ratified by the full governing board.

17. Links with other policies

This policy links to the following policies and procedures:

- a) Behaviour
- b) Staff code of conduct
- c) Complaints
- d) Health and safety
- e) Attendance
- f) Online safety
- g) Digital Devices
- h) Equality
- i) Relationships and sex education
- j) First aid
- k) Privacy notices
- l) Whistleblowing
- m) Anti-bullying
- n) Child on Child Abuse
- o) Safer Recruitment
- p) Allegations against members of staff
- q) EVC (Offsite trips)
- r) Suspension and Exclusion

APPENDICES

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

18 Appendix 1: types of abuse

18.1 Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by 1 definition or label. In most cases, multiple issues will overlap.

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

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

18.4 Emotional abuse may involve:

- a) Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- b) Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- c) Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- d) Seeing or hearing the ill-treatment of another
- e) Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

18.5 Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- a) 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
- b) 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)

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

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

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

- a) Provide adequate food, clothing and shelter (including exclusion from home or abandonment)

- b) Protect a child from physical and emotional harm or danger. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects.
- c) Ensure adequate supervision (including the use of inadequate care-givers)
- d) Ensure access to appropriate medical care or treatment

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

Appendix 2: specific safeguarding issues

19 Local Trends in Child Protection and Safeguarding

19.1 The identification and response to specific issues form part of annual safeguarding training at Malvern Wyche C of E Primary

19.2 As part of our culture of safeguarding we identify those which are the highest risk for our catchment and community, based on crime statistics, local partnership guidance and our own experience of serving the community.

19.3 This is a rolling risk assessment but we identify the most prevalent risks to children's safety and well-being to be:

- a) Domestic Abuse
- b) Children absent from education, and the relation of this to neglect.
- c) Online Safety

19.4 These specific issues form a core focus for our culture of safeguarding, whilst maintaining awareness of all other forms of abuse and signs that children may be suffering harm.

a) Domestic abuse

19.5 Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness or overhear abuse are themselves abuse victims, even if they are not the direct targets of the abuse.

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

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

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

19.9 If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Mercia Police is part of Operation Encompass and Malvern Wyche C of E Primary School received notifications of DA incidents directly from the police through a secure portal. When such notifications are received we will not contact the parents but will inform relevant staff on a need-to-know basis in order to put the correct support in place for the child. OE reports will be logged by ourselves as safeguarding concerns.

19.10 As part of our early help offer, if we believe a family is experiencing domestic abuse we can signpost to a range of services. [Worcestershire's Domestic Abuse Support Offer](#) is an effective hub for advice and action and we can support victims of any category of abuse, including coercive control, to request help, make referrals and access guidance.

- a) [West Mercia Women's Aid Domestic abuse helpline](#): 1 in 4 women in the UK will experience domestic abuse at some point in their lives. WMWA works for a world that is free from domestic abuse and violence against women and girls, where everyone can live without the fear and reality of all forms of violence, abuse and discrimination.

- b) [Refuge - National Domestic Abuse Helpline](#): Our 24/7 Helpline could mean the difference between life and death for women and children experiencing domestic abuse. Can you help keep this lifeline running?
- c) [Sandycroft Centre Redditch](#): Providing domestic abuse assessments (DASH); safety planning and referrals for home security and therapeutic trauma counselling.
- d) [SafeLives](#) – Digital and Online Safety: For someone experiencing domestic abuse, it can feel like every aspect of their world is controlled by the abuser – and the online world is no different. Although technology can help victims to access information and support.

19.11 Where we feel that there is a risk of violence or serious harm related to domestic abuse we will seek guidance from children and adult social services and make a Child Protection referral or a MARAC referral.

19.12 We are aware that Domestic Abuse victims may have phones and emails monitored and so where a person asks for help or guidance will give the option of paper copies of helpline numbers and services which may help.

19.13 Whilst we will give assistance and signpost services to any person who asks for help, we will remain impartial, not jump to conclusions and ensure child protection is our watchword. We will not, on the say-so of either party in alleged domestic abuse, contravene the rights of the other or without recourse to advice or legal guidance.

b) Children who are absent from education

19.14 A child being absent from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. Unexplainable and/or persistent absences from education may indicate children are at risk of or experiencing harm. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

- a) Are at risk of harm or neglect
- b) Are at risk of forced marriage or FGM
- c) Come from Gypsy, Roma, or Traveller families
- d) Come from the families of service personnel
- e) Go missing or run away from home or care
- f) Are supervised by the youth justice system
- g) Cease to attend a school
- h) Come from new migrant families

19.15 We will follow our own procedures for unauthorised absence and for dealing with children who are absent from education, particularly on repeat occasions, (please see separate [Attendance Policy](#)) to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points. Our CME contact at county is Matt Pooler and we will seek advice and make referral to the CME team should the need arise. [Children Missing Education Team](#).

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

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

19.18 Where it is deemed, after expert advice and consultation from parents/carers and partners in education and/or health, that a child is medically unable to attend full time, then a part-time timetable may be put in place. All decisions will be made in their own best interests and the decision will be made from a safeguarding point of view. This will be time limited, with frequent reviews and the aspiration will be that, through the correct interventions, the child will return to full time attendance as soon as possible, in their own best interests. Part time timetables are never behaviour sanctions – if a child is unable to attend school as a behaviour consequence this is a suspension or an exclusion and covered in the relevant policies. [Suspension and Exclusion Policy](#). Where a child is medically unfit to attend full time the school will make referrals to other services so that timely interventions can be put in place. A part time timetable will also generate a Team Around a Child (TAC) meeting to ensure frequent review and effective partner working and vigilant safeguarding.

C) Online Safety

19.19 We are aware that the internet and online communication present great opportunities for children learn, explore and communicate. However, the internet offers content which may be unsuitable or harmful to children and our online safety policy outlines in full how we promote safe use of the internet. Below are some specific safeguarding measures:

19.20 Education.

- a) Our RSE, PSHE and Computing curriculum teaches online safety and respect from Reception to year 6.
- b) We provide regular online safety assemblies for the whole school
- c) We write to parents each week about a range of current Online Safety issues
- d) There are resources on our website helping children and adults stay safe online.

19.21 Supervision

- a) In all subjects and opportunities, children's use of the internet is carefully supervised.
- b) Children are taught to report content which they think is suspicious or unsuitable.

19.22 Filtering

- a) Our network is filtered by Smoothwall, meaning that requests and traffic is analysed and potentially harmful content is blocked and logged.
- b) Smoothwall is monitored by Chestnut Infrastructure, our IT service providers.

19.23 Monitoring

- a) Smoothwall also monitors what users are typing, requesting or looking at. It is important that we know if anyone on the school network is attempting to look at inappropriate, harmful or illegal material, as this may raise child protection or safeguarding concerns, and may contravene our acceptable use policy.
- b) Where words, abbreviations or phrases are used which indicate a level of risk the DSL and deputy DSL are notified so that they can assess the risk, look at the context and act appropriately.

19.24 Intervention

- a) We will act to support children who we think may be at risk of suffering harm online, either through pastoral and behavioural support at school, working in partnership with parents, making necessary referrals to wider services and working with the police.

Child criminal exploitation

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

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

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

19.28 Indicators of CCE can include a child:

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

19.5 If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. DSLs at Malvern Wyche ACCESS West Mercia Police.

20 Child sexual exploitation

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

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

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

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

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

- a) Having an older boyfriend or girlfriend

b) Suffering from sexually transmitted infections or becoming pregnant

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

21 Child-on-child abuse

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

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

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

- a) Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- b) Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- c) Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- d) Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- e) Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- f) Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- g) Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- h) Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- i) Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

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

22 Homelessness

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

22.2 The DSL and deputy are able to access advice, support and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

24 FGM

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

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

25.3 Indicators that FGM has already occurred include:

- a. A pupil confiding in a professional that FGM has taken place
- b. A mother/family member disclosing that FGM has been carried out
- c. A family/pupil already being known to social services in relation to other safeguarding issues
- d. A girl:
 - i. Having difficulty walking, sitting or standing, or looking uncomfortable
 - ii. Finding it hard to sit still for long periods of time (where this was not a problem previously)
 - iii. Spending longer than normal in the bathroom or toilet due to difficulties urinating
 - iv. Having frequent urinary, menstrual or stomach problems
 - v. Avoiding physical exercise or missing PE
 - vi. Being repeatedly absent from school, or absent for a prolonged period
 - vii. Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
 - viii. Being reluctant to undergo any medical examinations
 - ix. Asking for help, but not being explicit about the problem
 - x. Talking about pain or discomfort between her legs

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

- a. The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- b. FGM being known to be practised in the girl's community or country of origin
- c. A parent or family member expressing concern that FGM may be carried out

d. A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

e. A girl:

- i. Having a mother, older sibling or cousin who has undergone FGM
- ii. Having limited level of integration within UK society
- iii. Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
- iv. Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
- v. Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- vi. Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- vii. Being unexpectedly absent from school
- viii. Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

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

26 Forced marriage

26.1 Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

26.2 It is also illegal to cause a child under the age of 18 to marry, even if violence, threats or coercion are not involved.

26.3 Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

26.4 If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

26.5 The DSL will:

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

27 Preventing radicalisation

27.1 Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

27.2 Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

27.3 Terrorism is an action that:

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- a. Endangers or causes serious violence to a person/people;
- b. Causes serious damage to property; or
- c. Seriously interferes or disrupts an electronic system

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

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

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

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

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

27.9 Staff will be alert to changes in pupils' behaviour.

27.10 The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a pupil is being radicalised can include:

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

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

27.12 If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

28 Sexual violence and sexual harassment between children in schools

28.1 Sexual violence and sexual harassment can occur:

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

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

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

28.4 If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

28.5 When supporting victims, staff will:

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

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

28.7 Staff should be aware of the importance of:

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

28.8 If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate which sets out more detail about our school's approach to this type of abuse.

29 Serious violent crime

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

- a. Increased absence from school
- b. Change in friendships or relationships with older individuals or groups
- c. Significant decline in performance

- d. Signs of self-harm or a significant change in wellbeing
- e. Signs of assault or unexplained injuries
- f. Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above).

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

- a. Being male
- b. Having been frequently absent or permanently excluded from school
- c. Having experienced child maltreatment
- d. Having been involved in offending, such as theft or robbery

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

30 Checking the identity and suitability of visitors

30.1 All visitors will be required to verify their identity to the satisfaction of staff.

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

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

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

- a) Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- b) The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)
- c) All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.
- d) Where visitors in regulated activity will be visiting more than three times in 1 month they will be recorded on the single central register.
- e) Visitors from external agencies (such as teaching supply agencies, music teachers) who as employers have responsibility for the relevant checks, assurance will be sought from these companies that all background checks have been made and these assurances kept on file, updated regularly.

31 Non-collection of children

31.1 If a child is not collected at the end of the session/day, we will:

- a) Wait a reasonable amount of time (15 mins) Ensure the child is brought indoors and supervised whilst they wait.
- b) After 15.40, we will telephone the parent we are expecting, to see if they are delayed.
- c) If the parent cannot be contacted we will attempt to contact others with parental responsibility.
- d) If these cannot be contacted we will contact anybody on the contact list provided by the parent.
- e) If by 4.30pm the child has not been collected, and there is no reason why this should be, we will contact the Family Front Door (Children's services) for advice.

32 Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

32.1 Unaccountable absence in our care

32.11 If a child in our care is missing we will:

- a) Alert senior leaders
- b) In pairs, simultaneously
- c) Conduct a rapid but thorough search of the school
- d) Conduct a rapid but thorough search of the grounds and the area outside the school.

32.12 If the child is found we will comfort and give care if necessary, then staff responsible for care will debrief with headteacher about how this occurred and how we can respond to the incident. The HT will present an anonymised account to the Chair of Governors.

32.13 If the child cannot be found and we believe that they may have left the premises we will inform the police and parents by telephone and continue to search.

32.2 Absconding from site

32.21 If a child in our care is observed to leave the premises, to the best of their ability staff will:

- a) Firmly and clearly advise the child they are not safe must not go further. They will be told we need to call the police.
- b) The school will call first the police then parents to ask for assistance and notify.
- c) Two members of staff will follow slowly without chasing or provoking.
- d) Where a member of staff has business insurance and can take another member of staff as assistance we may follow in a car.
- e) Verbal de-escalation strategies and open body language will be used at all times.
- f) If there is a chance to use positive handling safely it will be taken, but only in pairs or greater in line with agreed policy.
- g) If there is serious danger of injury or death staff will act to along the principle of preventing serious harm whilst having due care to their own welfare.

32.22 When recovered we will give care to the child as necessary and where relevant inform the police and the parent/carer if they are not already present.

32.23 When the child is recovered we will comfort and give care if necessary, then staff responsible for care will debrief with headteacher about how this occurred and how we can respond to the incident. The HT will present an anonymised account to the Chair of Governors.

33 Elective Home Education

Where parents express a wish to remove their child from school we will honour this right but make a referral to WCF's EHE team as this child is at risk of missing education. Where we have care, wellbeing or safeguarding concerns we will complete a safeguarding risk assessment and forward this to the EGE team. If we have serious concerns about a child's safety we will follow our child protection referral protocols through the family front door.

34 Untraceable children

34.1 Where children are absent and cannot be located, we would make a Children Missing Education referral through Worcestershire Children First and seek guidance from the family front door about a child protection referral.

34.2 Depending on guidance we make ask the police to make a safe and well check.

34.3 CME would mark this as ‘whereabouts unknown’ with CME to be further assessed and use the Whereabouts Unknown Review Form where safeguarding and other risk factors are considered.

34.4 In such cases that require ongoing action the CME Lead Officer will retain oversight of these cases.

34.5 Periodic searching of national/local databases will continue to establish if an individual’s whereabouts become known.

34.6 If successful, the case will be re-assigned to a CME officer.

34.7 If unsuccessful the CME Lead Officer will continue to make periodic checks until successful, a further review can take place, or until the child is beyond statutory school age.

35 Placing children in alternative provision

35.1 Where we place a pupil with an alternative provision provider, we continue to be responsible for the safeguarding of that pupil we will satisfy ourselves that the placement meets the pupil’s needs by

- a) Consulting with Children’s services, local authority about recommended and approved organizations
- b) Building a transparent and positive working relationship with AP providers to aid risk assessment and communication.
- c) DSL site visit before the placement is agreed.
- d) Pupil and parent site visit before placement starts
- e) Obtaining enhanced DBS assurance and accreditation documentation in advance of placement starting and keeping these on file.
- f) Visiting the child during the placement to observe them in context.

35.2 The cohort of pupils in Alternative Provision often have complex needs, it is important that governing bodies and proprietors of these settings are aware of the additional risk of harm that their pupils may be vulnerable to. The DfE has issued two pieces of statutory guidance to which commissioners of Alternative Provision should have regard:

<https://www.gov.uk/government/publications/alternative-provision>

<https://www.gov.uk/government/publications/education-for-children-with-health-needs-who-cannot-attend-school>

Appendix 3 Allegations Against Staff

Allegations Against Staff: Relevant Personnel

Headteacher	Stephen Murphy head@wyche.worcs.sch.uk
Designated Safeguarding Lead	Stephen Murphy head@wyche.worcs.sch.uk
Deputy Designated Safeguarding Lead	Sam Baylis sjb140@wyche.worcs.sch.uk
Deputy Designated Safeguarding Lead	Ruth Charles rcharles@wyche.worcs.sch.uk
Chair of Governors	Dan Eglin d.eglin@wyche.worcs.sch.uk
LADO	John Hancock (& team) lado@worcschildrenfirst.org.uk
Education Safeguarding Advisor	Denise Hannibal dhannibal@worcschildrenfirst.org.uk
HR Advisor	Melanie Powell-Jones mpowelljones@worcestershire.gov.uk
School Improvement Advisor	Jane Howard jhoward@worcestershirechildrenfirst.co.uk

Section A

36 Allegations that may meet the harm threshold

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

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

36.2 If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO) for advice and make a referral through the WCF portal.

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

36.4 A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors (see above) where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

38.6 If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform the LADO service.

39 Suspension of the accused until the case is resolved

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

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

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

39.3 If in doubt, the case manager will seek views from the school's HR/personnel adviser and the designated officer at the local authority, as well as the police and children's social care where appropriate, or where they are already involved.

40 Definitions for outcomes of allegation investigations

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

41 Procedure for dealing with allegations

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

- a. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- b. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- c. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where

the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- d. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- e. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- f. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- g. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- h. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- i. 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. In addition we will offer counselling through the Education Support charity and offer guidance about seeking further support, such as through their trade union, should they be a member, or their GP, should they need mental or physical health support. If the school feels that it needs to offer more structured support it will contact the Local Authority for guidance.
- j. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, where applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- k. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- l. 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.

41.2 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.

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

42 Additional considerations for supply teachers and all contracted staff

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

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

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

43 Timescales

43.1 We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

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

44 Specific actions

44.1 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.

44.2 Conclusion of a case where the allegation is substantiated

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

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

44.3 Individuals returning to work after suspension

44.31 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.

44.32 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.

44.4 Unsubstantiated, unfounded, false or malicious reports

If a report is:

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

45 Confidentiality and information sharing

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

45.2 The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- a. Who needs to know about the allegation and what information can be shared
- b. 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
- c. What, if any, information can be reasonably given to the wider community to reduce speculation
- d. How to manage press interest if, and when, it arises

46 Record-keeping

46.1 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.

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

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

- a. A clear and comprehensive summary of the allegation
- b. Details of how the allegation was followed up and resolved
- c. Notes of any action taken, decisions reached and the outcome
- d. A declaration on whether the information will be referred to in any future reference

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

46.5 We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

47 References

When providing employer references, we will:

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

48 Learning lessons

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

48.2 This will include consideration of (as applicable):

- a. Issues arising from the decision to suspend the member of staff
- b. The duration of the suspension
- c. Whether or not the suspension was justified
- d. 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

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

49 Non-recent allegations

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

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

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

Section B

50 Concerns that do not meet the harm threshold

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

50.2 Concerns may arise through, for example:

- a. Suspicion
- b. Complaint
- c. Safeguarding concern or allegation from another member of staff
- d. Disclosure made by a child, parent or other adult within or outside the school
- e. Pre-employment vetting checks

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

51 Definition of low-level concerns

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

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

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

- a. Being overly friendly with children
- b. Having favourites
- c. Taking photographs of children on their mobile phone
- d. Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- e. Humiliating pupils

52 Sharing low-level concerns

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

52.2 We will create this culture by:

- a. Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- b. Empowering staff to share any low-level concerns by approaching the headteacher in confidence or the chair of governors if the concern is about the headteacher
- c. Empowering staff, through training and culture, to self-refer
- d. Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- e. Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- f. Helping to identify any weakness in the school's safeguarding system
- g. Training regularly and maintaining awareness of this policy and the need to refer

53 Responding to low-level concerns

53.1 If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

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

53.2 The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

53.3 Further action may include conversations with the member of staff to draw to their attention that their conduct of concern, to remind them of the code of conduct and the teacher standards and make clear the school's expectations.

53.4 It may be where staff behaviour repeatedly fall's short of expectations and gives concern that disciplinary measures may be put in place, after anonymised consultation with HR.

53.5 Persistent causes for concern which do not meet the harm threshold may call into question a member of staff's suitability to work with children and may necessitate guidance from the LADO service and a referral as children's welfare must remain of paramount importance.

54 Record keeping

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

54.2 Records will be:

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

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

55 References

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

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

Stephen Murphy, DSL July 2024

Review July 2025