



The Ecclesbourne School  
"Learning together for the future"

Child Protection and Safeguarding policy  
**September 2022**

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This Policy was agreed by the Trustees on the 12th  
October.

This policy is due to be renewed September 2023.

This is a Statutory Policy

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# 1 Definitions, Principles and Aims

## 1.1 Safeguarding Statement

The Ecclesbourne School operates a whole school approach to safeguarding and protecting children. Where safeguarding is concerned, we maintain an ethos of “*it could happen here*”. We recognise that everyone in the school has a role to play to keep children safe. This includes identifying concerns, sharing information, and taking prompt action. Safeguarding and child protection is incorporated in all relevant aspects of processes and policy development. All systems, processes and policies operate with the best interests of the child at their centre.

We ensure that all children are safeguarded while on or off school premises and are proactive about anticipating and managing risks that children face in the wider community and online. To support this the school assesses the risks and issues in the wider community when considering the well-being and safety of its learners.

We recognise we have an important role to play in multi-agency safeguarding arrangements and contribute to multi-agency working as set out in Working Together to Safeguard Children (2018). As a relevant agency, the school understands its role within local safeguarding arrangements and operates in accordance with the Derby and Derbyshire Safeguarding Children multi-agency procedures, including the local criteria for action (known as the Threshold Document) and local protocols for assessment in Derby and Derbyshire.

Safeguarding and promoting the welfare of children is defined for the purposes of this policy as:

- Protecting children (everyone under the age of 18) from maltreatment;
- Preventing impairment of children’s health or development;
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care and
- Taking action to enable all children to have the best outcomes.

## 1.2 Principles

We believe:

- Safeguarding is everyone’s responsibility: all staff should play their full part in keeping children safe.
- We will aim to protect children using national, local and school child protection procedures.
- All children have the *right* to be protected from harm as defined by Article 3 in the UN Declaration on the Rights of the Child.
- Children need to be safe and to feel safe in school in order to grow, learn and develop.
- Schools can contribute to the promotion of children’s welfare and the prevention of harm.
- Children need support which matches their individual needs, including those who may have experienced abuse.
- In a multi-agency approach and so we work in partnership with other agencies in promoting safeguarding arrangements as set out by Working Together to Safeguard Children 2020.
- In a child centred approach where students can clearly express their wishes, feelings and views.
- That all staff should have a clear understanding regarding abuse and neglect in all forms; including how to identify, respond and report.
- That all staff understand the process of managing allegations against staff including low level concerns.
- Staff should feel confident that they can report all safeguarding concerns in the school and that these will be dealt with swiftly, appropriately and securely, following correct procedures and always maintaining the safety and wellbeing of the children involved.

## 1.3 We help to keep children safe by:

- Providing safe environments, with secure access, where children can learn and develop.
- Clarifying standards of behaviour for staff and students.
- Identifying children who may need early help, and who are at risk of harm or who have been harmed. This can include, but is not limited to: neglect, abuse (including by other children), grooming or exploitation.

- Introducing appropriate work within the curriculum;
- Acting in the best interests of children to protect them online and offline, including when they are receiving remote education.
- Ensuring staff understand the causes of harm.
- Addressing concerns at the earliest possible stage.
- Implementing child protection procedures.
- Working in partnership with students, parents and other agencies.

#### **1.4 Our strong safeguarding culture - Why it is important.**

Safeguarding is everyone's responsibility and it is the duty of the school to safeguard and promote the welfare of children. This is our core safeguarding principle.

In adhering to this principle, we focus on providing a safe and welcoming environment for all children regardless of age, ability, culture, race, language, religion, gender identity or sexual identity. All children have equal rights to support and protection.

One of the cornerstones of our safeguarding culture is this policy and the procedures contained within it. This policy applies to all staff, volunteers and governors, all of whom are trained on its contents and on their safeguarding duties. This policy is updated at least annually to reflect changes to law and guidance and best practice.

This policy should be read alongside our other safeguarding policies, which are set out in Appendix Two.

#### **1.5 What it means for our students**

We work with our local safeguarding partners to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans which provide additional support to the child.

All staff have an equal responsibility to act on any suspicion or disclosure that may indicate that a child is at risk of harm. Any student or staff involved in a child protection or safeguarding issue will receive appropriate support.

Our strong safeguarding culture ensures that we treat all students with respect and involve them in decisions that affect them. We encourage positive, respectful and safe behaviour among students and we set a good example by conducting ourselves appropriately.

Identifying safeguarding and child protection concerns often begins with recognising changes in students' behaviour and knowing that these changes may be signs of abuse, neglect or exploitation. Challenging behaviour may be an indicator of abuse.

All staff will reassure children that their concerns and disclosures will be taken seriously and that they will be supported and kept safe.

## **2 Safeguarding legislation and guidance**

The following safeguarding legislation and guidance has been considered when drafting this policy:

- Keeping Children Safe in Education (2022)
- Working Together to Safeguarding Children (2018 - updates 2022 0
- What to do if you're worried a child is being abused (2015)
- The Teacher Standards (2012)
- The Safeguarding Vulnerable Groups Act (2006)
- Section 157 of the Education Act (2002)
- The Education (Independent School Standards) Regulations (2014)
- The Domestic Abuse Act (2021)

- PACE Code C (2019)

### 3 Roles and responsibilities

#### 3.1 Shared responsibilities for safeguarding

The safety and wellbeing of our children must always be at the heart of everything we do. Therefore, all adults in our school (staff, volunteers and Governors) are responsible for protecting the welfare of every child. If an adult has a concern about a child, then they must act. To say nothing is to do nothing. We will always strive to work together and do the basic things as well as possible. We will always aim to put the child first and make sure their voice is heard. From there we will always follow our procedures methodically and will ensure that dialogue and relationship building are central to securing the best academic and personal outcomes for our students.

#### 3.2 Staff and Governors with key safeguarding responsibilities

- Head Teacher: James McNamara (jmcnamara@ecclesbourne.derbyshire.sch.uk)
- Chair of Governors: Richard Lindop (rlindop@ecclesbourne.derbyshire.sch.uk)
- Designated Safeguarding and LAC Lead: Clarissa Ourabi (courabi@ecclesbourne.derbyshire.sch.uk)
- Safeguarding Assistant: Emma Williams ewilliams@ecclesbourne.derbyshire.sch.uk
- Head Lower School & Deputy DSL: Petra Owen-Moore (powen@ecclesbourne.derbyshire.sch.uk)
- Head Upper School & Deputy DSL: Dave Duncker-Brown (ddunckerbrown@ecclesbourne.derbyshire.sch.uk)
- Head Sixth Form and Deputy DSL: Hannah Weller (hweller@ecclesbourne.derbyshire.sch.uk)
- Designated Governor for Safeguarding: Elisabeth Page (lpage@ecclesbourne.derbyshire.sch.uk)
- SENDCO, Deputy DSL: David Partridge (dpartridge@ecclesbourne.derbyshire.sch.uk)
- Head of Inclusion: Helen Green (hgreen@ecclesbourne.derbyshire.sch.uk)
- Head of Year 7: Jake Poplawski (jpoplawski@ecclesbourne.derbyshire.sch.uk)
- Head of Year 8: Sally Smyth (ssmyth@ecclesbourne.derbyshire.sch.uk)
- Head of Year 9: Emma Stott (estott@ecclesbourne.derbyshire.sch.uk)
- Head of Year 10: Vicky Dodson (vdodson@ecclesbourne.derbyshire.sch.uk)
- Head of Year 11: Mark Sellers (msellers@ecclesbourne.derbyshire.sch.uk)
- Head of Year 12: Penny Bamber (pbamber@ecclesbourne.derbyshire.sch.uk)
- Head of Year 13: Zoe Farina (zfarina@ecclesbourne.derbyshire.sch.uk)
- Pastoral Support Worker: Louise Monk (lmonk@ecclesbourne.derbyshire.sch.uk)
- School Nurse: Lisa Tanser (ltanser@ecclesbourne.derbyshire.sch.uk)

#### 3.3 The Governing Body

The Governing Body will oversee the policy, ensure its implementation and review its content on an annual basis and will monitor the work of school leaders to ensure:

- The school remains up to date with emerging issues in safeguarding and understands the strategies being used by the Local Authority in trying to keep children safe.
- That enhanced DBS and any other checks that may be required for staff, volunteers and Governors are carried out.
- There is a nominated Governor responsible for oversight of Child Protection and safeguarding.
- The school provides annual safeguarding training for staff, volunteers and Governors.
- That all DSLs undertake WRAP/Prevent training and keep this training up to date.
- That there is a Senior Designated Safeguarding Lead and at least one Deputy Designated Safeguarding lead appointed from the Strategic Leadership Team. The school has a Designated Safeguarding Lead and four deputies. Ten other pastoral leaders are also trained to DSL standard.

- That the DSLs including deputy DSLs are fully equipped to undertake the DSL safeguarding role and that all DSLs have access to appropriate training including certified training every two years.
- That there is a Designated Safeguarding Lead on the premises, and available, at all times during the school day and that there is a contact for any school holiday activities.
- That there is an appointed teacher who is responsible for Looked after Children as defined by DfE guidance.
- That there is a link Governor responsible for oversight of the work of the SENDCO.
- That there is a designated lead for Mental Health and Wellbeing appropriately trained as a Senior Mental Health Lead.
- That there are procedures in place for handling allegations against staff including referral to the Local Area Designated Officer (LADO).
- That quality assurance and audit is carried out to make sure robust Safer Recruitment procedures and a framework of checks are in place, including tracking and monitoring of all staff on the Single Central Record.
- That all staff and anyone who has contact with children, including Governors, volunteers and frequent visitors, undertake an induction which includes knowledge of types of abuse and specific safeguarding concerns and how to make a referral.
- That in the curriculum children are taught about safeguarding, including online safety.
- That Relationship and Sex Education (RSE) is fully embedded into the curriculum and is compliant with statutory requirements.
- That all child protection records are kept centrally, kept up to date, are secure and reviewed regularly.
- That an overview of records and data used in the school are discussed with the governing body to help identify patterns, trends, specific safeguarding issues and that this is a regular activity of the Strategic Leadership Team and senior DSL.

**The Governing Body/Strategic Leadership Team will also ensure that:**

- We notify the Local Authority of a Child Missing from Education within the timescales set out by the Local Authority
- We notify the allocated Social Worker, if there is an unexplained absence of a child who is the subject of a Child Protection Plan.
- We notify Children’s Services if it is thought or known that a child may be Privately Fostered and will seek advice from Children’s Services on hosting families as they may come under this regulation.
- We notify the Local Authority and Children’s Services if we have welfare concerns of a child who is likely to be or is Electively Home Educated (EHE).
- That we use the Police Prevent referral pathway to report concerns about extremism or views considered to be extreme.
- That we use the national systems in place to report any unsuitable adult to:
  - The DBS service;
  - National Barring and Disclosure Service;
  - The Teacher Regulation Agency/Or if not a member of teaching staff any other relevant body.

**3.4 The Head Teacher**

The Head Teacher will take day-to-day responsibility for the above and will report on Safeguarding matters to the Governing Body annually and will report any significant Safeguarding issues to the Chair of the Governing Body and local authority, as appropriate, during the year. This includes against staff reported to the Local Area Designated Officer (LADO).

**3.5 The Designated Safeguarding Lead (DSL):**

The designated safeguarding lead takes lead responsibility for safeguarding and child protection (including online safety) in the school. The DSL duties include:

- ensuring child protection policies are known, understood and used appropriately by staff
- working with the board of trustees to ensure that the school’s child protection policies are reviewed annually and that the procedures are reviewed regularly

- acting as a source of support, advice and expertise for all staff on child protection and safeguarding matters
- liaising with the headteacher regarding ongoing enquiries under section 47 of the Children Act 1989 and police investigations and be aware of the requirement for Children to have an Appropriate Adult in relevant circumstances.
- acting as a point of contact with the three safeguarding partners
- making and managing referrals to children’s social care, the police, or other agencies
- taking part in strategy discussions and inter-agency meetings
- liaising with the Local Area Designated Officer (LADO) at the local authority if allegations are made against staff
- making staff aware of training courses and the latest local safeguarding arrangements available through the local safeguarding partner arrangements
- transferring the child protection file to a child’s new school

### **3.6 The Deputy Designated Safeguarding Lead(s):**

Our Deputy DSL(s) is/are trained to the same level as the DSL and support(s) the DSL with safeguarding matters on a day-to-day basis. The ultimate lead responsibility for child protection remains with the DSL.

### **3.7 The Safeguarding Governors**

The role of the safeguarding governors is to provide support and challenge to the DSL and the leadership of the school on how they manage safeguarding so that the safety and wellbeing of the children can continuously improve. The role includes:

- understanding the requirements of the Governance Handbook and Keeping Children Safe in Education 202
- supporting and challenging the DSL on the standards of safeguarding at the school
- confirming that consistent and compliant safeguarding practice takes place across the school
- check the single central record and human resource files to ensure we are compliant
- reporting to the Governing Body about the standard of safeguarding in the school
- The DSL and the safeguarding governors will meet on a regular basis to discuss safeguarding issues and to agree steps to continuously improve safeguarding practices in the school.

### **3.8 Heads of Year:**

The Designated Lead for Safeguarding may delegate responsibility for regular case monitoring and reviews of vulnerable children. These reviews are evidenced in discussions during PLT and supervision meetings and all notes and files are uploaded onto My Concern.

### **3.9 Individual Staff and Volunteer responsibilities**

Understand and abide by the provisions of this policy and the document Guidance for Safer Working Practices (2020) and refer as needed to the related documents set out in section two. The Ecclesbourne School Whistleblowing Policy (2022) should also be referred to.

- Know who the Designated Safeguarding Lead is and also the lead for Anti-Bullying, SEND and Children looked after/Previously looked after.
- Be alert to the signs of abuse and neglect and refer any concerns to the Designated Safeguarding Lead.
- Be aware of the schools safeguarding practices including the whistleblowing policy.
- Ensure Child Protection & Safeguarding training is up-to-date and completed at least annually.
- Listening to and seeking out, the views, wishes and feelings of children and can demonstrate this in their practice.
- Being aware of the ‘Allegations against Professionals’ LADO procedures and feeling confident about raising concerns about other staff and the setting in-line with the Whistle Blowing Policy 2022.
- Identifying children in their setting who may be vulnerable to criminal and sexual exploitation; including trafficking and knowing what action to take, including referring into children’s services and or the police.



- Recognising that children can abuse other children or their peers. This is referred to as child-on child abuse. That this abuse may constitute sexual violence and/or harassment and should be reported to the Designated Safeguarding Lead (DSL).
- There will also be occasions when you suspect that a child may be at risk, but you have no 'real' evidence or that the child may need support with their mental health. The child's behaviour and or appearance may have changed, their attendance may have reduced, their ability to concentrate and focus may have altered, or you may have noticed other behavioural and or physical but inconclusive signs. In these circumstances, you should try to give the child the opportunity to talk. The signs you have noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if you can help in any way. This is professional curiosity and is important to build a picture of what might have changed in a child's life and to then put the best support in place we can. These early concerns should be recorded using My Concern.
- It is not the responsibility of the school staff to investigate welfare concerns or determine the truth of any disclosure or allegation; this is the responsibility of local authority children's social care. All staff however have a duty to recognise where extra support is needed or where there are complex needs or child protection concerns requiring intensive or specialist support.

### 3.10 Staff Responsibilities

Staff must always **immediately** inform the designated safeguarding lead or their deputy if there are any:

- Concerns that a child is presenting signs or symptoms of abuse or neglect, including suspicion that a child is injured, marked, or bruised in a way which is not readily attributable to the normal knocks or scrapes received in play
- Searching incidents where there are reasonable grounds to suspect a learner was in possession of a prohibited item or where a search has revealed a safeguarding risk
- Behaviour or changes in presentation, including changes in school attendance, which gives rise to suspicions that a child may not be receiving adequate care or may be suffering harm
- Hint or disclosure of abuse about or by a child
- Concerns that a person(s) who may pose a risk to children is living in a household with children present
- Concerns about online abuse including cybercrime, exploitation, harmful sexual behaviour, sharing nudes and semi nudes and/or where any adult appears to be sexually communicating (e.g., email, text, written note or verbally) with a child
- Concerns about child-on-child abuse, including sexual violence and harassment
- Information which indicates that the child is living with someone who does not have parental responsibility for them (this is known as private fostering)
- Concerns that a child is at risk of domestic abuse or so called 'honour-based' abuse, including forced marriage, female genital mutilation (FGM), breast ironing, virginity testing or hymenoplasty
- Concerns that a child is at risk of radicalisation, child sexual exploitation or criminal exploitation, including county lines; (this is also known locally as CRE - child at risk of exploitation) or that a child or their parent/carer may be a victim of modern slavery (trafficked)

**Remember: If you are unsure, you should always have a discussion with the designated safeguarding lead or their deputy**

## 4 Children who may be particularly vulnerable

Some children are at greater risk of abuse. This increased risk can be caused by many factors including social exclusion, isolation, discrimination and prejudice. To ensure that all of our students receive equal protection, we give special consideration to children who:

- are vulnerable because of their race, ethnicity, religion, disability, gender identity or sexuality
- are vulnerable to being bullied, or engaging in bullying
- are at risk of sexual exploitation, forced marriage, female genital mutilation, or being drawn into extremism

- live in chaotic or unsupportive home situations
- live transient lifestyles or live away from home or in temporary accommodation
- are affected by parental substance abuse, domestic violence or parental mental health needs
- do not have English as a first language

#### **4.1 Children with special educational needs and disabilities**

Children with special educational needs and disabilities (SEND) can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children, which can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

We therefore made the decision to train our SENDCO as a Deputy Designated Safeguarding Lead to support the SEND students in being alert to safeguarding concerns. However, all staff are aware that SEND students are more vulnerable to safeguarding concerns and are alert to the signs.

#### **4.2 Children missing education**

Children missing education, particularly repeatedly, can be an indicator of abuse and neglect, including sexual abuse or exploitation, child criminal exploitation, mental health problems, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Our staff are alert to these risks.

We closely monitor attendance, absence and exclusions and our DSL will take appropriate action including notifying the local authority, particularly where children go missing on repeated occasions and/or are missing for periods during the school day.

In addition, we will always notify parents immediately if their child is not in school and no explanation has been provided for their absence. If parents/carers are unaware of where they are then we will notify the police and report them missing from education (CME).

We also recognise that when children are not in school, such as when a child is on a part-time timetable, suspended or excluded, they miss the protection and opportunities that education can provide, and can become more vulnerable to harm. Learners who have a social worker, including looked-after children, and previously looked-after children are especially vulnerable. We proactively support students in the school environment and decision-making processes about part-time timetables, suspension or exclusion operate in the best interest of children as outlined in local and national guidance. We aim to reduce the number of suspensions and exclusions by ensuring that we have a clear behaviour policy that is consistency applied across the school. We also mirror and reward good behaviour so students are clear on the high expectations we set and we celebrate this in a number of ways.

#### **4.3 Looked after children and previously looked after children**

We ensure that appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after him/her.

**The designated safeguarding lead has:**

- Details of the child's social worker, and
- The name and contact details of the virtual school head and the relevant support officer in the authority that looks after the child
- The name of the Personal Advisor appointed to support a child who has left care.

When dealing with looked after children and previously looked after children, the school will work with all local authority children's social care, health and other relevant agencies and take prompt action when necessary to safeguard these children, who are a particularly vulnerable group. The schools designated lead for Looked after/Previously Looked after children is the Designated Safeguarding Lead. The DSL has appropriate training, relevant qualifications, and experience for all the authorities that she works with. This includes attending face-to-face or virtual sessions training sessions to support the students.

#### **4.4 Elective home education.**

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the school will seek to co-ordinate a meeting with the parents/carers, Local Authority, and other key professionals where possible. This would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child and is particularly important where a child has SEND, is vulnerable, and/or has a social worker. Where a child is taken off roll, we will inform the Local Authority of the deletion from our admission register via the system outlined on the Derby or Derbyshire Education Welfare webpages. The school works with individual families to remove any in-school or out of school barriers that may add to the decision for parents/carers to home educate.

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. Unfortunately, children who are LGBT, or are simply perceived to be LGBT, can be targeted by other children. The risk to these children can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

Our staff endeavour to reduce the barriers and provide a safe space for those children to speak out or share their concerns with them. Safe spaces are displayed in classrooms so students know where they can go to seek help and support.

#### **4.6 Other students that may need additional support**

We also recognise that in addition to the above, other factors can increase a child's vulnerability to abuse, exploitation, or neglect such as:

- In a family circumstance presenting challenges for the child, such as parental substance (drugs and/or alcohol) misuse, adult mental health issues and domestic abuse
- Misusing drugs and or alcohol
- Being an asylum seeker/refugee
- Being from our New Communities
- Living away from home, including private fostering arrangements, or have returned home to their family from care
- Are at risk of homelessness or living in temporary accommodation
- Living in chaotic, neglectful, and unsupportive home situations
- Vulnerable to discrimination and maltreatment on the grounds of age, gender reassignment, marriage/civil partnership, pregnancy/maternity leave, disability, race (including colour, nationality, ethnic or national origin), religion/belief, gender, sex, or sexual orientation
- Being a young carer
- Not speaking or not having English as a first language
- Being involved in the court system
- Children affected by parental offending or with family members in prison

The pastoral leadership team (PLT) meet weekly to discuss students that may need the additional support and actions are put in place, In addition all Heads of Year will assess a child's level of need and ensure this recorded in My Concern so the Designated Safeguarding Lead can offer the advice of 'where next' in the supervision meetings.

## **5 Mental health**

As a school we have an important role to play in supporting the mental health and wellbeing of our students. Therefore, we have a Senior Mental Health Lead and an additional 20 trained mental health first aiders. These staff have the ability to support students in school and signpost to external agencies where they can receive specialist support. Students are able to identify these staff through photos that are displayed in classrooms and around social areas of the school.

All staff through training are aware that mental health problems can be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff are also aware that where children have suffered adverse childhood experiences those experiences can impact on their mental health, behaviour and education. However, we do not always make the assumption that a child with a mental health need will always have a safeguarding need.

Where staff are concerned that a child's mental health is also a safeguarding concern, they will discuss it with the DSL or a deputy.

Where a child is displaying low level mental health concerns they can be supported in school by the Pastoral Support Worker or the School Nurse. Heads of Year and Parents can make direct referrals. Where support is given, there will be a six-week support plan in place. In addition, the school offers a welfare hub where students can drop in before and after school and also during lunch to seek advice about any issue.

We also have trained well-being ambassadors from all year groups and they support their peers also. This includes quiet spaces for all students to use that are staffed by well-being ambassadors and staff.

## **6 Child-on-child abuse including sexual harassment and violence;**

All staff working in, or behalf of the school maintain an attitude of it 'could happen here' - this is especially important when dealing with child-on-child abuse. Even if there are no reports it does not mean it is not happening. Where there is an allegation of child and child abuse then it must be immediately referred to the relevant school office.

Child-on-child abuse – children harming other children - is unacceptable and will be taken seriously; it will not be tolerated or passed off as 'banter' 'just having a laugh', 'part of growing up' or 'boys being boys. It is more likely that boys will be perpetrators of child-on-child abuse and girls' victims, but allegations will be dealt with in the same manner, regardless of whether they are made by boys or girls.

### **6.1 Child-on-child abuse**

- physical abuse such as shaking, hitting, biting, kicking or hair pulling
- bullying, including cyberbullying, prejudice-based and discriminatory bullying
- sexual violence and harassment such as rape and sexual assault or sexual comments and inappropriate sexual language, remarks or jokes
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- upskirting, which involves taking a picture under a person's clothing without their knowledge for the purposes of sexual gratification or to cause humiliation, distress or alarm
- consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery) including pressuring others to share sexual content
- abuse in intimate personal relationships between peers (also known as teenage relationship abuse) - such as a pattern of actual or threatened acts of physical, sexual or emotional abuse
- initiation/hazing – used to induct newcomers into sports team or school groups by subjecting them to potentially humiliating or abusing trials with the aim of creating a bond
- It can also include causing someone to engage in extremist or radicalising behaviour

Different gender issues can be prevalent when dealing with child-on-child abuse, for example girls being sexually touched/assaulted or boys being subject to initiation/hazing type violence.

All staff recognise that that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place but is not being reported.

## 6.2 Minimising risks

There is a whole school approach to preventing child-on-child abuse, including child-on-child sexual violence and sexual harassment; this forms part of our whole school approach to safeguarding. We will seek to minimise the risk of child-on-child abuse by ensuring an approach that prepares learners for life in modern Britain. The establishment has a clear set of values and standards which are upheld and demonstrated throughout the school life.

We take the following steps to minimise or prevent the risk of child-on-child abuse:

- Promoting an open and honest environment where children feel safe and confident to share their concerns and worries through the pastoral offices or the welfare hub
- The introduction of an anonymous reporting tool where students do not feel comfortable to share their concerns/worries face-to-face this is Tootoot.
- Using assemblies to outline acceptable and unacceptable behaviour.
- Using PDC lessons to educate and reinforce our messages through stories, role play, current affairs and other suitable activities
- Ensuring that the school is well supervised, especially in areas where children might be vulnerable during unstructured times
- Have a consistent behaviour policy and pyramid of sanctions that is displayed throughout the school
- Creating safe spaces which are staffed and where students can go to either share their concerns or to have time out from the social spaces
- Student panels to understand the risks they face both in school and the local community and to put actions in place to address this.

## 6.3 Systems for children to report abuse

Even if there are no reports, all staff understand it does not mean it is not happening; it may be the case that it is not being reported. We recognise that children may not find it easy to tell staff about the abuse, that certain children may have additional barriers to telling someone and children can show signs or act in ways they hope adults will notice or react to. In some cases, victims may make indirect reports via a friend or staff may overhear conversations. All staff recognise the indicators and signs of child-on-child abuse and know how to identify it. To support students in making disclosures we use an anonymised reporting system called TooToot.

## 6.4 Summary of Investigating allegations

All allegations of child-on-child abuse should be passed to the DSL immediately who will investigate and manage the allegation as follows:

- **Gather information** - children and staff will be spoken with immediately to gather relevant information and information will be recorded on the disclosure/ incident forms before being uploaded onto My Concern
- **Decide on action** - if it is believed that any child is at risk of significant harm, a referral will be made to children's social care. The DSL will then work with children's social care to decide on next steps, which may include contacting the police. In other cases, we may follow our behaviour policy alongside this Child Protection and Safeguarding Policy. Action will be put in place for both the victim and the perpetrator.
- **Inform parents** - we will usually discuss concerns with the parents. However, our focus is the safety and wellbeing of the students and so if the school believes that notifying parents could increase the risk to a child or exacerbate the problem, advice will first be sought from children's social care and/or the police before parents are contacted.
- **Recorded** – all concerns, discussions and decisions made, and the reasons for those decisions will be recorded on My Concern. The record will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved, and a note of the action taken, decisions reached and the outcome. As child-on-child abuse is also a behaviour issue it will also be recorded on SIMS to track and monitor trends.

Where allegations of a sexual nature are made, the school will follow the statutory guidance set out in Part 5 of Keeping Children Safe in Education 2022.

Children can report allegations or concerns of child-on-child abuse to any staff member and that staff member will pass on the allegation to the DSL in accordance with this policy. To ensure children can report their concerns easily, they can speak to any member of staff, including the pastoral team and visit the welfare hub for advice, support and guidance. In addition, they can report anonymously to begin with until they have the courage to speak face-to-face to a member of staff.

### **6.5 Action on concerns raised**

Child-on-child abuse may be a one-off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. In particular, reports of sexual violence and harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. In all cases the initial response to a report is very important. Members of staff will take the concerns seriously and reassure the child that they will be supported and kept safe, regardless of how long it has taken them to come forward. If possible, reports should be managed with two members of staff present (preferably one being the designated safeguarding lead or a deputy), however this might not be possible in all cases. The victim will not be given the impression they are creating a problem or made to feel ashamed for making a report or their experience minimised. Abuse which has occurred online or outside of the school will be treated just as seriously as that which has occurred within the education environment.

When an allegation is made by a student against another student members of staff should consider if the issues raised indicate that the child and/or alleged perpetrator may have low level, emerging needs, complex/serious needs, or child protection concerns and these should be taken into account.

#### **Considerations for cases where child-on-child abuse is a factor include:**

- What are the wishes of victims in terms of how they want to proceed?
- What is the nature, extent and context of the behaviour including verbal, physical, sexual (including sharing of nudes/semi-nudes) and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the time, location, duration, and frequency? Is the incident a one off or a sustained pattern of abuse? (Remember there may be other forms of abuse in addition to what has been reported) Were other children and /or adults involved? Has a crime been committed and/or have any harmful sexual behaviours been displayed?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this e.g. coercion), and family and social circumstances? What is the nature of the relationship between the children involved? Are they in a current or previous intimate personal relationship, do they live in the same household or setting, attend the same school/college, classes, or transport?
- What are the relative chronological and developmental ages of the children? Does the victim or perpetrator have a disability or learning difficulty? Are there any differentials in power, social standing, or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child victim or alleged perpetrator themselves and others e.g. other children in school/college, adult students, school/college staff, in the child's household (particularly siblings or other children related to the household), extended family, peer group or wider social network? Are there any links to child sexual exploitation, child criminal exploitation or gang related activity?

Immediate consideration should be given to how best to support and protect the victim and alleged perpetrator and any other children involved/impacted. Where the report involves rape and assault by penetration, the alleged perpetrator must be removed from any classes they share with the victim. There must also be careful consideration on how best to keep the victim and alleged perpetrator apart on school (including any before or after school activities) and on transport to and from the setting.

For all other reports of sexual violence and sexual harassment and forms of child-on-child abuse, the proximity of the victim and alleged perpetrator and considerations regarding shared classes, school premises and transport should be considered immediately.

All decisions will be made in the best interests of the children involved and should not be perceived to be a judgement on the guilt of the alleged perpetrator. In all cases, the initial report should be carefully evaluated on a case-by-case basis with the designated safeguarding lead taking a leading role and using their professional judgement, supported by other agencies, such as local authority children's social care and the police as required. The designated safeguarding lead will refer to relevant assessment tools and guidance as appropriate such as:

- Keeping Children Safe in Education, part five
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- Searching, screening and confiscation at school
- Stop it Now Sexual Behaviours Traffic Light Tool
- DDSCP Thresholds Document
- DDSCP Safeguarding Children Procedures, in particular Children who present a risk of harm to others and Online Safety and Internet Abuse procedures
- When to call the police – guidance for schools and colleges.

Whenever there is an allegation of abuse, including concerns about sexual harassment and violence, made against a child, the designated safeguarding lead and other appropriate staff will draw together separate risk and needs assessments and action plans to support the victim and the alleged perpetrator. These will consider;

- The victim, especially their protection and support
- Whether there have been other victims
- The alleged perpetrator/s
- All the other children (and if appropriate adult students and staff) at the school especially any actions that are needed to protect them from the perpetrator/s, or from future harms
- The time and location of the incident and any action required to make the location safer
- When information can be disclosed to staff and others, including the alleged perpetrator and parents/carers

Whenever local authority children's social care and/or the police are involved, the school will work in collaboration to ensure the best possible support and protection is provided for both the victim and the alleged perpetrator.

All reports of child-on-child abuse (including sexual harassment and/or sexual violence) will be recorded in the child's safeguarding/child protection file. This will include all decision making, risk and needs assessment and plans recorded on My Concern.

Where appropriate incidents may be managed internally (low level needs), via early help (emerging needs) or through local authority children's social care (complex/serious needs or child protection concerns); reports to the police will be run in parallel with children's social care as outlined in the Derby and Derbyshire multi-agency safeguarding procedures, in particular Children who Present a Risk of Harm to Others and Online Safety and Internet Abuse procedures.

All risk and needs assessment and action plans whether internal or multi-agency will be reviewed and updated on a regular basis. If things do not improve or deteriorate the situation should be reconsidered.

The school uses the Contextual Safeguarding School Beyond Referrals Self-Assessment Toolkit & Guidance to self-assess our response to harmful sexual behaviour. All relevant policies will be updated to reflect the lessons learnt and consideration given to the wider cultural issues within the school that enabled the behaviour to occur.

Where the victim or alleged perpetrator transfers to another education setting, the designated safeguarding lead will ensure the new provider will be made aware of any on-going support needs (and will discuss this with the victim and where appropriate their parents, as to the most suitable way of doing this) as well as transferring the safeguarding/child protection file. In the case of the alleged perpetrator, where appropriate, this will also include potential risks to other children and staff.

## **7 Action by the Designated Safeguarding Lead (or other senior person in their absence)**

Following any information raising concern, the Designated Safeguarding Lead will consider:

- Any urgent medical needs of the child;
- Making an enquiry to the Central Database (formerly the Child Protection Register);
- Discussing the matter with other agencies involved with the family;
- Consulting with appropriate persons e.g. Police, Social Care etc.;
- The child's wishes.

Then decide:

- Wherever possible, to talk to parents/carers, unless to do so may place a child at risk of significant harm, impede any Police investigation and/or place the member of staff or others at risk;
- Whether to make a child protection referral to Social Care because a child is suffering or is likely to suffer significant harm and if this needs to be undertaken immediately.

OR

- Not to make a referral at this stage;
- If further monitoring is necessary;
- If it would be appropriate to undertake an Early Help referral and/or make a referral for other services.

All information and actions taken, including the reasons for any decisions made, will be fully documented on My Concern. All referrals to Social Care will be accompanied by a standard Referral Form.

### **7.1 Action following a child protection referral**

The Designated Safeguarding Lead or other appropriate member of staff will:

- Make regular contact with Social Services;
- Contribute to the Strategy Discussion and Initial Assessment;
- Provide a report for, attend and contribute to any subsequent Child Protection Conference;
- If the child or children have a Child Protection Plan, contribute to the Child Protection Plan and attend Core Group Meetings and Review Child Protection Conferences;
- Share all reports with parents prior to the meetings;
- Where a child is having a Child Protection Plan moves from the School or goes missing, immediately inform the key worker in Social Services.

## **8 Early Help**

The School will deliver its responsibilities for identifying and acting on early help needs, Safeguarding and Child Protection using Derbyshire's Threshold document to ascertain the support a student may need. Heads of Year can refer students with low-level concerns to the school nurse or the Pastoral Support worker.

All staff/anyone who has contact with a child or young person (including Governors and volunteers) are made aware of what Early Help means, how to identify emerging needs and understanding their role within it. This means sharing information and having discussions with the Designated Safeguarding Lead, where they believe a child is vulnerable and may need additional support put in place.



The provision of Early Help Services should form part of a continuum of help and support to respond to the different levels of need of individual children and their families. Where Early Help is needed from outside agencies then an Early Help Assessment is completed in conjunction with the student, their family and any other agency that works alongside the child.

When providing early help provision in the school, this school can demonstrate they have a framework and structures to support the work including information sharing, procedures around step up into Children's social care, robust recording & advice and support to staff in early help activity.

Starting Point is Derbyshire's first point of contact and referral service for children; including advice, support and next steps. This includes a professional's advice line and this is available for the Designated Safeguarding Lead to use.

### **8.1 The following are examples of where a child may require Early Help;**

- Is disabled and has specific additional needs;
- Has special educational needs;
- Is a privately fostered child;
- Has returned home to their family from care;
- Is showing signs of engaging in anti-social or criminal behaviour;
- Is in a family circumstance presenting challenges for the child such as substance abuse, adult mental health and/or domestic violence;
- Is showing early signs of abuse and/or neglect;
- Is showing signs of displaying behaviour or views that are considered to be extreme;
- Is mis-using alcohol or drugs themselves;
- Is showing signs of emotional/mental ill health
- Not attending school or at risk of exclusion from school;
- Frequently going missing/goes missing from care or from home;
- Is at risk of modern slavery, trafficking, exploitation or radicalisation;
- Not in education, training or employment after the age of 16 (NEET);
- Is homeless or is at risk of homelessness.

## **9 Record Keeping**

All concerns about a child will be recorded onto My Concern in-line with GDPR regulations. Each concern will be clearly recorded with all decisions, actions taken and feedback to the referrer recorded. The Designated Lead for Safeguarding is responsible for ensuring that Child Protection Records are stored securely. All staff have access to My Concern but this access differs dependent upon your level of responsibility for example a staff member is only able to report a concern but not see a concern. The DSL, Head Teacher and the Deputy DSL's have access to all the information stored on My Concern so that they are able to build a picture.

We will follow the recommended GDPR guidelines of all records kept on staff and children, in relation to Safeguarding. We know that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

We will follow the Local Authorities' current guidance on the Child Protection Record Keeping Guidance for Schools and await any instruction with regard to the National Inquiry into Child Sexual Abuse (historical Child Protection records on children and records on staff where there are allegations). We will therefore not destroy any child protection/welfare records including records which hold information on allegations against staff and any other person working in the school or connected to the school.

### **9.1 The School will record;**

Information about the child: name (including previous names), address, D.O.B, those with parental responsibility, primary carers, emergency contacts, names of persons authorised to collect from the School and any court orders or child protection orders.

### **9.2 All records should be objective and include:**

- Key contacts in other agencies including GP details;
- Any disclosures/accounts from child or others, including parents/carers (original notes are kept and uploaded onto My Concern);
- All concerns, discussions, decisions, actions taken (dated, timed and signed) and arrangements for monitoring/reviewing.
- Statements, facts and observable things (what was seen/heard);
- Diagram indicating position, size, colour of any injuries (photographs if appropriate);
- Words the child uses (not translated into 'proper' words);
- Non-verbal behaviours.

### **9.3 School will monitor:**

- Injuries/marks;
- Attendance;
- Changes, e.g. mood/academic functioning;
- Relationships;
- Language;
- Behaviour;
- Demeanour and appearance;
- Statements and comments;
- Medicals;
- Stories, 'news', drawings;
- Parental behaviours/care of child.

Parents/carers will be aware of information held on their children and kept up to date regarding any concerns or developments by the appropriate members of staff. General communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility.

The school will not disclose to a parent any information held on a child if, in the judgment of the Designated Safeguarding Lead, this would put the child at risk of significant harm. If a student leaves The Ecclesbourne School, child protection records will be forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature. We will forward the child protection records to their new destination, in their entirety, and will ensure receipt is confirmed. We will retain hard copies of any paper files and electronic notes and will securely archive them. Contact between The Ecclesbourne School and the receiving school may be necessary. We will record on an excel document, using the transfer of student file protocol, where and to whom the records have been passed and the date transferred. We will adhere to current guidance from the Data Commissioner and seek legal advice as appropriate in respect of forwarding files abroad.

If sending by post, student records will be sent by "Special/Recorded Delivery". For audit purposes a note of all student records transferred or received will be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received. If a student is permanently excluded and moves to a Student Referral Unit, child protection records will be forwarded on to the relevant organisation. Where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support.

When the Designated Safeguarding Lead or other key nominated staff resign their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder.

In exceptional circumstances, when a face-to-face handover is unfeasible, the Head Teacher will ensure that the new post holder is fully conversant with all procedures and case files.

## **10 Serious violence**

All staff are made aware of indicators that children are at risk from or are involved with serious violent crime. These include increased absence, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts could also indicate that children have been approached by or are involved with individuals associated with criminal gangs.

All staff are made be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced maltreatment and having been involved in offending, such as theft or robbery.

## **11 Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE)**

Both CCE and CSE are forms of abuse and both occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. This power imbalance can be due to a range of factors, including:

- Age
- Gender
- Sexual identity
- Cognitive ability
- Physical strength
- Status
- Access to economic or other resources

The abuse can be perpetrated by individuals or groups, males or females, and children or adults. They can be one-off occurrences or a series of incidents over time and may or may not involve force or violence. Exploitation can be physical and take place online.

### **11.1 Child Criminal Exploitation (CCE)**

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

Children can become trapped by this exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or carry a knife for a sense of protection.

Children involved in criminal exploitation often commit crimes themselves. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys and both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

## 11.2 CCE Indicators

CCE indicators can include children who:

- appear with unexplained gifts or new possessions
- associate with young people involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs or alcohol
- go missing for periods of time or regular return home late
- regularly miss school or education or do not take part in education

## 11.3 Child Sexual Exploitation (CSE)

CSE is a form of child sexual abuse which may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Sexual exploitation is a serious crime and can have a long-lasting adverse impact on a child's physical and emotional health. It may also be linked to child trafficking.

## 11.4 CSE Indicators

The above indicators can also be indicators of CSE, as can children who:

- have older boyfriends
- suffer sexually transmitted infections or become pregnant
- frequently miss school

We include the risks of criminal and sexual exploitation in our RSE, PDC and assembly program. It is often the case that the child does not recognise the coercive nature of the exploitative relationship and does not recognise themselves as a victim so education is extremely important.

Victims of criminal and sexual exploitation can be boys or girls and it can have an adverse impact on a child's physical and emotional health.

All staff are aware of the indicators that children are at risk of or are experiencing CCE or CSE. All concerns are reported immediately to the DSL. Staff must always act on any concerns that a child is suffering from or is at risk of criminal or sexual exploitation.

## 12 County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs around the country using dedicated mobile phone lines. Children and vulnerable adults are exploited to move, store and sell drugs and money, with offenders often using coercion, intimidation, violence and weapons to ensure compliance of victims.

County lines exploitation can occur where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child. This power imbalance can be due to the same range of factors as set out in this policy.

Children can be targeted and recruited into county lines in a number of locations, including schools and the local community.

Additional specific indicators that may be present where a child is criminally exploited include children who:

- go missing and are subsequently found in areas away from home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection
- are found in accommodation with which they have no connection or in a hotel room where there is drug activity
- owe a 'debt bond' to their exploiters
- have their bank accounts used to facilitate drug dealing.

All staff are aware of indicators that children are at risk from or experiencing criminal exploitation. The main indicator is increased absence during which time the child may have been trafficked for the purpose of transporting drugs or money.

### **13 Sharing nudes and semi-nudes**

Sharing photos, videos and live streams online is part of daily life for many children and young people, enabling them to share their experiences, connect with friends and record their lives. Sharing nudes and semi-nudes means the sending or posting online of nude or semi-nude images, videos or live streams by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums, or carried out offline between devices via services like Apple's AirDrop.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents. Alternative terms used by children and young people may include 'dick pics' or 'pics'. Other terms used in education include 'sexting', 'youth produced sexual imagery' and 'youth involved sexual imagery'.

The motivations for taking and sharing nudes and semi-nudes are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

#### **13.1 All incidents involving nude or semi-nude images will be managed as follows:**

The incident will be referred to the DSL immediately and the DSL will discuss it with the appropriate staff. If necessary, the DSL may also interview the children involved.

- Parents will be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put a child at risk of harm.
- At any point in the process, if there is a concern a young person has been harmed or is at risk of harm, we will refer the matter to the police and/or children's social care.
- At no time will any member of staff look at any images on the phone but where they believe a criminal act has potentially occurred, they will contact the police, having confiscated the phone which they will then hand over.

The UK Council for Internet Safety updated its advice for managing incidences of sharing nudes and semi-nudes in December 2020 - [UKCIS advice 2020](#) . The school will have regard to this advice when managing these issues.

## 14 Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. As well as educating children about online risks, we have appropriate filtering and monitoring systems in place to limit the risk of children being exposed to inappropriate content, subjected to harmful online interaction with other users and to ensure their own personal online behaviour does not put them at risk. These filtering and monitoring systems are reviewed regularly to ensure their effectiveness.

We tell parents and carers what filtering and monitoring systems we use, so they can understand how we work to keep children safe in our online safety policy.

We will also inform parents and carers of what we are asking children to do online, including the sites they need to access, and with whom they will be interacting online through the Show My Homework app.

Online safety risks can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content such as pornography, fake news, misogyny, self-harm, suicide, radicalisation and extremism
- **Contact:** being subjected to harmful online interaction with other users such as peer to peer pressure and adults posing as children or young adults to groom or exploit children
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm such as making, sending and receiving explicit images, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

All staff are aware of these risk areas and should report any concerns to the DSL.

## 15 Domestic abuse

The Domestic Abuse Act 2021 introduces a legal definition of domestic abuse and recognises the impact of domestic abuse on children if they see, hear or experience the effects of abuse.

Domestic abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse, between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. It includes people who have been or are married, are or have been civil partners, have agreed to marry one another or each have or have had a parental relationship in relation to the same child. It can include psychological, physical, sexual, financial and emotional abuse.

Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home. This means children can also be victims of domestic abuse.

Children can witness and be adversely affected by domestic violence in their home life. Experiencing domestic abuse and exposure to it can have a serious emotional and psychological impact on children, and in some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. All of which can have a detrimental and long term impact on their health, well-being, development, and ability to learn. We therefore always refer to students who have been in a household where domestic violence has taken place as a victim and they should be treated as such by the school.

Where police have been called to a domestic violence incident where children are in the household and experienced that incident, the police will inform the DSL. This ensures that the school has up to date safeguarding information about the child. Once we are aware that there has been a domestic violence incident, we will always carry out a welfare checks on the child and this is then recorded onto My Concern. If a child is not in school after the school is informed on a domestic violence incident, we will contact parents and the social services if necessary,

All staff are aware of the impact domestic violence can have on a child. If any of our staff are concerned that a child has witnessed domestic abuse, they will report their concerns immediately to the DSL.

## **16 Honour-Based abuse**

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

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. Our staff are aware of this dynamic and additional risk factors and we take them into consideration when deciding what safeguarding action to take.

If staff are concerned that a child may be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead.

## **17 Female Genital Mutilation**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal and a form of child abuse with long-lasting harmful consequences.

FGM is carried out on females of any age, from babies to teenagers to women. Our staff are trained to be aware of risk indicators, including concerns expressed by girls about going on a long holiday during the summer break. If staff are concerned that a child may be at risk of FGM or who has suffered FGM, they should speak to the designated safeguarding lead. Teachers are also under legal duty to report to the police where they discover that FGM has been carried out on a child under 18. In such circumstances, teachers will personally report the matter to the police as well as informing the designated safeguarding lead.

## **18 Forced Marriage**

A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Coercion may include physical, psychological, financial, sexual and emotional pressure or abuse. Forced marriage is illegal.

Our staff are trained to be aware of risk indicators, which may include being taken abroad and not being allowed to return to the UK.

Forced marriage is not the same as arranged marriage, which is common in many cultures.

If staff are concerned that a child may be at risk of forced marriage, they should speak to the designated safeguarding lead.

## **19 Radicalisation and Extremism**

Extremism is defined as vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Children are vulnerable to extremist ideology and radicalisation. Whilst Islamic fundamentalism is the most widely publicised, extremism and radicalisation can occur in other cultures, religions and beliefs, including the far right and white supremacy. Our staff are trained to identify those at risk of being radicalised or drawn into extremism.

If staff are concerned that a child may be at risk of radicalisation or being drawn into extremism, they should speak to the designated safeguarding lead.

## **20 Staff/student relationships**

Staff are aware that inappropriate behaviour towards students is unacceptable and that it is a criminal offence for them to engage in any sexual activity with a student under the age of 18.

We provide our staff with advice regarding their personal online activity and we have clear rules regarding electronic communications and online contact with students. It is considered a serious disciplinary issue if staff breach these rules.

Our Staff Code of Conduct sets out our expectations of staff and staff must read this at the start of each academic year. Staff are also reminded of professional boundaries at the start of the academic year.

## **21 Safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers**

If a safeguarding concern or allegation is made about a member of staff, supply staff, contractor or a volunteer, our set procedures must be followed. Our safeguarding concerns and allegations made about staff, supply staff, contractors and volunteers' policy and procedure are in-line with Derbyshire recommendations. Please refer to appendix 3 to see the Derbyshire flowchart. The full procedure for managing such allegations or concerns are set out in Part Four of Keeping Children Safe in Education 2022.

Safeguarding concerns or allegations made about staff who no longer work at the school will be reported to the police and the Local Area Designated Officer (LADO).

## **22 Whistle blowing if you have concerns about a colleague**

It is important that all staff and volunteers feel able to raise concerns about a colleague's practice. All such concerns should be reported to the headteacher, unless the complaint is about the headteacher, in which case concern should be reported to the chair of governors.

Staff may also report their concerns directly to children's social care or the police if they believe direct reporting is necessary to secure action.

The school's whistleblowing policy allows staff to raise concerns or make allegations and for an appropriate enquiry to take place.

## **23 Staff and Governor training**

Our staff receive appropriate safeguarding and child protection training which is regularly updated. In addition, all staff receive safeguarding and child protection updates on a regular basis to ensure they are up to date and empowered to provide exceptional safeguarding to our students this is through our safeguarding bulletin which is issued each half-term.

New staff, volunteers receive a briefing during their induction which covers this Child Protection and Safeguarding policy and our staff behaviour policy, how to report and record concerns and information about our Designated Safeguarding Lead and deputy DSLs.

Our governors receive appropriate safeguarding and child protection (including online) training at induction which equips them with the knowledge to provide strategic challenge to test and assure themselves that there is an effective whole school approach to safeguarding. This training is updated at least annually.

Our safeguarding governor receives additional training to empower them to support and challenge the Designated Safeguarding Lead and support the delivery of high-quality safeguarding across the trust.

## **24 Safer Recruitment**

The governing body and our senior leadership team are responsible for ensuring we follow recruitment procedures that help to deter, reject or identify people who might harm children. When doing so we check and verify the applicant's identity, qualifications and work history in accordance with Keeping Children Safe in Education 2022 and the local safeguarding partner arrangements.



All relevant staff are made aware of the disqualification from childcare guidance and their obligations to disclose to us relevant information that could lead to disqualification.

We ensure that our volunteers are appropriately checked and supervised when in school. We check the identity of all contractors working on site and request DBS checks where required by Keeping Children Safe in Education 2022. Contractors who have not undergone checks will not be allowed to work unsupervised during the school day.

When using supply staff, we will obtain written confirmation from supply agencies or third-party organisations that staff they provide have been appropriately checked and are suitable to work with children. Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained confirming their suitability to work with children.

The school maintains the single central record of recruitment checks undertaken. This is checked by the Designated Safeguarding Lead; Safeguarding Governor and the Head Teacher. Our recruitment policy and procedures explains this in more detail.

## **25 Site security**

Visitors are asked to sign in at the school reception and are given a badge, which confirms they have permission to be on site. If visitors have undergone the appropriate checks, they can be provided with unescorted access to the school site. Visitors who have not undergone the required checks will be escorted at all times. All visitors will be provided with a leaflet explaining their safeguarding duties and what they must do if they are concerned about the welfare of a child.

## **26 Child protection procedures**

### **26.1 Recognising abuse**

Abuse and neglect are forms of maltreatment. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Abuse may be committed by adult men or women and by other children and young people.

Keeping Children Safe in Education 2022 refers to four categories of abuse. These are set out at Appendix One along with indicators of abuse.

### **26.2 Taking action**

Any child could become a victim of abuse. Key points for staff to remember for taking action are:

- In an emergency take the action necessary to help the child, if necessary call 999.
- Complete a reporting a concern form and upload onto My Concern and also inform the DSL immediately. Where necessary ask the student to make notes and then date and sign them.
- Share information on a need-to-know basis only and do not discuss the issue with colleagues, friends or family.

### **26.3 If you are concerned about a student's welfare**

Staff may suspect that a student may be at risk. This may be because the student's behaviour has changed, their appearance has changed or physical signs are noticed. In these circumstances, staff will give the student the opportunity to talk and ask if they are OK.

If the student does reveal that they are being harmed, staff should immediately inform the Designated Safeguarding Lead and record it onto My Concern.

Staff are aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened, which could be due to their vulnerability, disability and/or sexual orientation or language barriers.

This will not prevent our staff from having a professional curiosity and speaking to our DSL if they have concerns about a child.

#### **26.4 If a student discloses to you**

If a student tells a member of staff about a risk to their safety or wellbeing, the staff member will:

- remain calm and not overreact
- allow them to speak freely
- not be afraid of silences
- not ask investigative questions
- give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- not automatically offer physical touch as comfort
- let the student know that in order to help them they must pass the information on to the DSL
- tell the student what will happen next
- complete the disclosure form and pass it to the DSL as soon as possible
- report verbally to the DSL even if the child has promised to do it by themselves

#### **26.5 Notifying parents**

The school will normally seek to discuss any concerns about a student with their parents. If the school believes that notifying parents could increase the risk to the child or exacerbate the problem, advice will first be sought from children’s social care and/or the police before parents are notified.

#### **26.6 Referral to children’s social care**

The DSL will make a referral to children’s social care if it is believed that a student is suffering or is at risk of suffering significant harm. The student (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child.

#### **26.7 Reporting directly to child protection agencies**

Staff should follow the reporting procedures outlined in this policy. However, they may also share information directly with children’s social care or the police if they are convinced that a direct report is required or if the Designated Safeguarding Lead, the deputies, the head teacher or the chair of governors are not available, and a referral is required immediately.

#### **26.8 Confidentiality and sharing information**

Child protection issues necessitate a high level of confidentiality. Staff should only discuss concerns with the Designated Safeguarding Lead, headteacher or chair of governors.

#### **26.9 Sharing information**

The DSL will normally obtain consent from the students and/or parents to share child protection information. Where there is good reason to do so, the DSL may share information *without* consent, and will record the reason for deciding to do so.

Information sharing will take place in a timely and secure manner and only when it is necessary and proportionate to do so and the information to be shared is relevant, adequate and accurate.

Information sharing decisions will be recorded, whether or not the decision is taken to share. This will be recorded on My Concern.

The UK GDPR and the Data Protection Act 2018 do not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. If any member of staff receives a request from a student or parent to see child protection records, they will refer the request to the Data Protection Officer.

## **27 Special Circumstances**

### **27.1 Looked after children**

The most common reason for children becoming looked after is as a result of abuse or neglect. The school ensures that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for looked after children and the DSL have details of the child's social worker and the name and contact details of the local authority's virtual head for children in care.

## **28 Appendix 1 - Four categories of abuse**

It is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the designated safeguarding lead. It is the responsibility of staff to report their concerns.

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

### **Physical abuse**

Physical abuse is a form of abuse which 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.

### **Indicators of physical abuse**

The following may be indicators of physical abuse:

- have bruises, bleeding, burns, bites, fractures or other injuries
- show signs of pain or discomfort
- keep arms and legs covered, even in warm weather
- be concerned about changing for PE or swimming
- An injury that is not consistent with the account given
- Symptoms of drug or alcohol intoxication or poisoning
- Inexplicable fear of adults or over-compliance
- Violence or aggression towards others including bullying
- Isolation from peers

### **Emotional abuse**

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

### **Indicators of emotional abuse**

The following may be indicators of emotional abuse:

- The child consistently describes him/herself in negative ways
- Over-reaction to mistakes
- Delayed physical, mental or emotional development
- Inappropriate emotional responses, fantasies
- Self-harm
- drug or solvent abuse
- Running away
- Appetite disorders – anorexia nervosa, bulimia; or
- Soiling, smearing faeces, enuresis

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as

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

### **Indicators of sexual abuse**

The following may be indicators of sexual abuse:

- Sexually explicit play or behaviour or age-inappropriate knowledge
- Aggressive behaviour including sexual harassment or molestation
- Reluctance to undress for PE or swimming
- Anal or vaginal discharge, soreness or scratching
- Bruises or scratches in the genital area
- Reluctance to go home
- Refusal to communicate
- Depression or withdrawal
- isolation from peer group
- Eating disorders, for example anorexia nervosa and bulimia
- self-harm
- substance abuse
- acquire gifts such as money or a mobile phone from new 'friends'

### **Neglect**

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

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

### **Indicators of neglect**

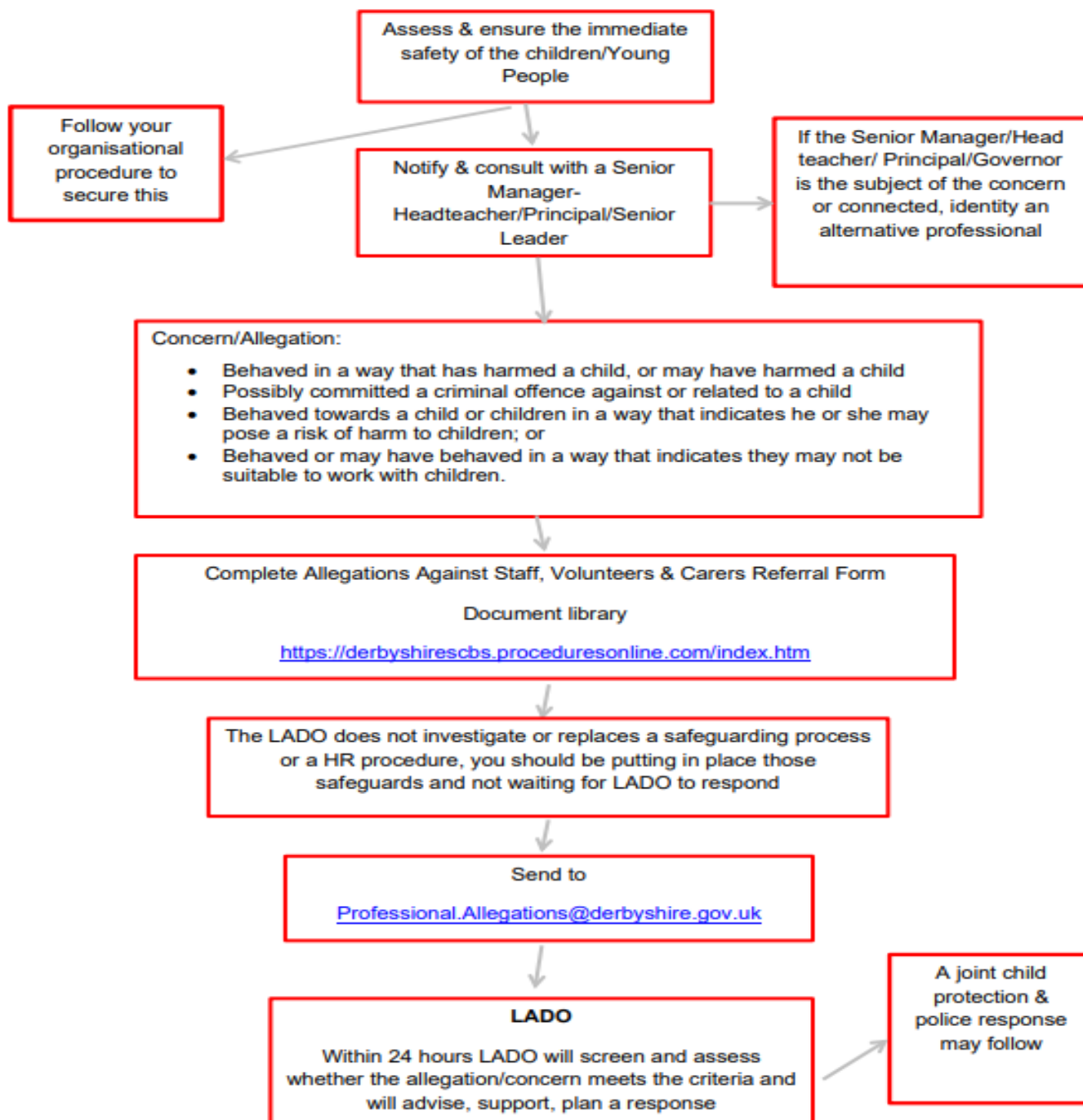
The following may be indicators of neglect:

- Constant hunger or stealing, scavenging and/or hoarding food
- Frequent tiredness
- Frequently dirty or unkempt
- Poor attendance or often late
- Poor concentration
- Illnesses or injuries that are left untreated
- Failure to achieve developmental milestones or to develop intellectually or socially
- Responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- The child is left at home alone or with inappropriate carers

## **29 Appendix 2 - Related Safeguarding policies**

- Staff Code of conduct
- Physical intervention and the use of reasonable force
- Behaviour
- Exclusion and Suspension
- Personal and intimate care
- Complaints procedure
- Anti-Bullying
- Safe working practice
- Whistleblowing
- SEND
- Allegations made about staff, supply staff, contractors and volunteers
- Grievance and disciplinary
- Online Safety Policy

**Allegations-Concerns against Staff, Volunteers & Carers  
LADO Process**



## 31 Appendix 4 – Key Contacts

<b>Targeted Early Help requests</b>	<p>Locality Vulnerable Children Meeting (VCM) for requests for targeted early help via multi-agency team (MAT) or non-urgent social care referrals via Locality Based Single Point of Access (SPA) Clerks:</p> <p><b>Locality 1 &amp; 5</b> Derwent, Chaddesden, Spondon, Oakwood, Mackworth, Allestree and Darley Email: <a href="mailto:vcm1and5@derby.gov.uk">vcm1and5@derby.gov.uk</a></p> <p><b>Locality 2</b> Sinfin, Alvaston, Boulton, Chellaston, Osmaston and Allenton Email: <a href="mailto:vcm2@derby.gov.uk">vcm2@derby.gov.uk</a></p> <p><b>Locality 3 &amp; 4</b> Balgreaves, Littleover, Mickleover, Normanton and Abbey Email: <a href="mailto:vcm3and4@derby.gov.uk">vcm3and4@derby.gov.uk</a></p> <p><b>The Light House</b> (Integrated Disabled Children's Service) Tel: 01332 256990 Email: <a href="mailto:VCM-IDCS@derby.gov.uk">VCM-IDCS@derby.gov.uk</a></p>	<p>Requests for support from professionals, should be made via the <a href="#">online request for support</a> unless a child is at risk of Significant Harm and if this is the case then you need to contact Starting Point (see below).</p>
<b>Speak to a Social Worker for thresholds advice and consultation</b>	<p>Children's Services Professional Consultation Line 07812 300329</p>	<p>Starting Point Consultation and Advice Service for Professionals 01629 535353</p>
<b>Referrals to Local Authority Children's Social Care</b>	<p><b>Initial Response Team</b> <b>Urgent:</b> 01332 641172 or out of hours via Careline 01332 956606 <b>Non urgent:</b> <a href="#">Derby Children's Social Care Online Referral system</a></p>	<p><b>Starting Point</b> <b>Urgent:</b> 01629 533 190 <b>Non Urgent:</b> <a href="#">Starting Point online</a></p>
<b>Local Authority Designated Officer (LADO)</b>	<p>Derby and Derbyshire LADO referral <a href="#">form</a> Email: <a href="mailto:CPMduty@derby.gov.uk">CPMduty@derby.gov.uk</a></p>	<p>Derby and Derbyshire LADO referral <a href="#">form</a> Email: <a href="mailto:professional.allegations@derbyshire.gov.uk">professional.allegations@derbyshire.gov.uk</a></p>
<b>Derbyshire Police</b>	<ul style="list-style-type: none"> <li>• 999 for emergencies or 101 for non-emergencies</li> <li>• Mandatory reporting of Female Genital Mutilation (FGM) via 101</li> <li>• The school Police Safer neighbourhood team is Rural, Holloway and Belper. Please use the safer neighbourhood webpage and then complete the online form.</li> </ul>	
<b>Prevent (radicalisation and extremism)</b>	<ul style="list-style-type: none"> <li>• Police Prevent (radicalisation/extremism) Team on 101 or directly via 0300 1228694</li> <li>• Prevent/channel referral <a href="#">form</a></li> <li>• For advice contact: Derbyshire - 01629 538473 or <a href="mailto:prevent@derbyshire.gov.uk">prevent@derbyshire.gov.uk</a> Derby - 07765 222032 or <a href="mailto:sally.siner@derby.gov.uk">sally.siner@derby.gov.uk</a></li> </ul>	



<b>Education Welfare and Local Authority Children Missing Education CME) Officer</b>	<ul style="list-style-type: none"> <li>• Louise Monk- Attendance Officer</li> <li>• Clarissa Ourabi- Head of Pastoral Care.</li> <li>• CME: 01332 641448 or <a href="mailto:cme@derby.gov.uk">cme@derby.gov.uk</a></li> <li>• See <a href="#">Children Missing Education</a> for further information and CME referral form and for notification forms for child on roll, removal from roll and removal from roll to Elective Home Education (EHE)</li> </ul>	<ul style="list-style-type: none"> <li>• Louise Monk- Attendance Officer</li> <li>• Clarissa Ourabi- Head of Pastoral Care.</li> <li>• CME: <a href="mailto:CS.CMECoordinators@derbyshire.gov.uk">CS.CMECoordinators@derbyshire.gov.uk</a></li> <li>• See <a href="#">Children missing from education (CME) policy and guidance</a> and <a href="#">removal from school roll</a> for further information</li> </ul>
<b>Virtual School for Looked After Children</b>	<ul style="list-style-type: none"> <li>• Virtual School Head - 07812 301044 or <a href="mailto:graeme.ferguson@derby.gov.uk">graeme.ferguson@derby.gov.uk</a></li> <li>• The school LAC contact is Clarissa Ourabi</li> </ul>	<ul style="list-style-type: none"> <li>• Rachel Moore, Head of the Virtual School for Children in Care 07798 882876</li> <li>• The school LAC contact is Clarissa Ourabi</li> </ul>
<b>Public Health Nurse for the School</b>	We have a school nurse in school that can deal with day-to-day queries – this is Lisa Tanser. The public health school nurse is Tammy Heath- you can request support from your local GP to see the school nurse.	
<b>Emotional Health and Well-being Services</b>	In school Petra Owen-Moore is responsible for Mental Health and well –being. We also have a number of trained mental health first aiders. See the contact details above for Petra Owen-Moore.	
<b>Domestic Abuse</b>	<ul style="list-style-type: none"> <li>• <a href="#">Safer Derby City</a></li> <li>• Derbyshire constabulary - information and advice about domestic abuse <a href="#">webpages</a></li> </ul>	<ul style="list-style-type: none"> <li>• Safer Derbyshire domestic abuse <a href="#">webpage</a></li> <li>• Derbyshire constabulary - information and advice about domestic abuse <a href="#">webpages</a></li> </ul>
<b>Harmful Sexual Behaviour Service</b>	Action for Children Pathway Programme Service for harmful sexual behaviours. Please note this service is for children in Derbyshire who are living with their birth family. <a href="mailto:pathwayservice@actionforchildren.org.uk">pathwayservice@actionforchildren.org.uk</a>	
<b>Cyberchoices</b>	For children at risk of being drawn into cybercrime via <a href="#">East Midlands Cyber Secure</a>	
<b>Homelessness or at risk of homelessness</b>	Derby city council homelessness <a href="#">webpages</a>	Derbyshire county council Preventing homelessness <a href="#">webpages</a>

### Key National Contacts

Organisation	Description and contact details
<b>NSPCC helpline for adults</b>	Helping adults protect children 24 hours a day. For help and support, including anyone needing advice about female genital mutilation, young people affected by gangs, concerns that someone may be a victim of modern slavery contact the NSPCC trained helpline counsellors on: <ul style="list-style-type: none"> <li>• Text 88858</li> <li>• 0808 800 5000</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>NSPCC helpline Report Abuse in Education</b>	Bespoke helpline for children and young people who've experienced abuse at school, and for worried adults and professionals who need support and guidance:

	<ul style="list-style-type: none"> <li>• 0800 136 663</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>NSPCC Whistleblowing Advice</b>	Free advice and support for professionals concerned about how child protection issues are being handled in their organisation: <ul style="list-style-type: none"> <li>• 0800 028 0285</li> <li>• <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>UK Safer Internet Centre professional advice line</b>	Helpline for professionals working with children and young people in the UK with any online safety issues they may face themselves or with children in their care: <ul style="list-style-type: none"> <li>• 0844 381 4772</li> <li>• <a href="mailto:helpline@saferinternet.org.uk">helpline@saferinternet.org.uk</a></li> </ul>
<b>Police Anti-Terrorist Hot Line number</b>	0800 789 321
<b>National Domestic Abuse Helpline</b>	Hosted by <a href="#">Refuge</a> , Helpline 0808 2000247
<b><a href="#">Operation Encompass</a></b>	Resources for schools include free advice from an Education Psychologist about how best to support children via National Helpline 0204 513 9990
<b>Report harmful online content</b>	<ul style="list-style-type: none"> <li>• UK Safer Internet Centre – <a href="#">report online harm</a>. A national reporting centre that has been designed to assist anyone in reporting harmful content online</li> <li>• <a href="#">CEOP</a> – to report online sexual abuse or the way someone has been communicating online</li> </ul>
<b>Report Abuse in Education helpline</b>	<ul style="list-style-type: none"> <li>• Young people who have experienced abuse at school and parents and teachers who are concerned about sexual abuse in education settings can call the Report Abuse in Education helpline on 0800 136 663 or email <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></li> </ul>
<b>Harmful Sexual Behaviour Support Services</b>	<ul style="list-style-type: none"> <li>• SWGfL Harmful Sexual Behaviour Support Service for the children’s workforce 0344 2250623 or email <a href="mailto:hsbsupport@swgfl.org.uk">hsbsupport@swgfl.org.uk</a></li> <li>• Stop it now! For worries about a child’s sexual behaviour, 0808 1000 900</li> </ul>

## 32 Appendix 5- Seven Golden Rules for Information Sharing

1. Remember that the UK General Data Protection Regulation (UK GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately.
2. Be open and honest with the individual (and/or their family where appropriate) from the outset about why, what, how and with whom information will, or could be shared, and seek their agreement, unless it is unsafe or inappropriate to do so.
3. Seek advice from other practitioners, or your information governance lead, if you are in any doubt about sharing the information concerned, without disclosing the identity of the individual where possible.
4. Where possible, share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the UK GDPR and Data Protection Act 2018 you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When you are sharing or requesting personal information from someone, be clear of the basis upon which you are doing so. Where you do not have consent, be mindful that an individual might not expect information to be shared.

5. Consider safety and well-being: base your information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
6. Necessary, proportionate, relevant, adequate, accurate, timely and secure: ensure that the information you share is necessary for the purpose for which you are sharing it, is shared only with those individuals who need to have it, is accurate and up-to-date, is shared in a timely fashion, and is shared securely (see principles).
7. Keep a record of your decision and the reasons for it – whether it is to share information or not. If you decide to share, then record what you have shared, with whom and for what purpose.

Taken from [Information Sharing: advice for practitioners providing safeguarding services to children, young people, parents and carers \(2018\)](#) HM Government

### **33 Appendix 6. Managing allegations against staff**

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

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

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

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO). We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governor where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity. Our procedures for dealing with allegations will be applied with common sense and judgement.

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

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

#### **Based on an assessment of risk, we will consider alternatives such as;**

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

If in doubt, the case manager will seek views from the school's legal advisors and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

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

### **Procedure for dealing with allegations**

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

- 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
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- 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.
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member).
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

Where the police are involved, wherever possible the 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.

#### **Additional considerations for supply teachers and all contracted staff**

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

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

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

#### **Timescales**

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

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.

- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days. However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions**

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

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

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

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

#### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

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

#### **Confidentiality and information sharing**

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

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

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

#### **Record-keeping**

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

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

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

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

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

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

### **References**

When providing employer references, we will:

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

### **Learning lessons**

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

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

### **Section 2: concerns that do not meet the harm threshold.**

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

- Suspicion

- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

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

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

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

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

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

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

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns.
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system.

### **Responding to low-level concerns**

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the Staff 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.

### **Record keeping**

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

### **Records will be:**

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR.



- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority.

- Retained at least until the individual leaves employment at the school Where a low-level concern relates to a supply teacher or contractor, we will notify the individual’s employer, so any potential patterns of inappropriate behaviour can be identified. References We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

### References

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

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

## 34 Appendix 7: Spectrum of Behaviour

### Allegation

Behaviour which indicates that an adult who works with children have;

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Personally, committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates that they may pose a risk of harm to children and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

### Low level concern

Does not meet that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern- no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult may have acted in that way.

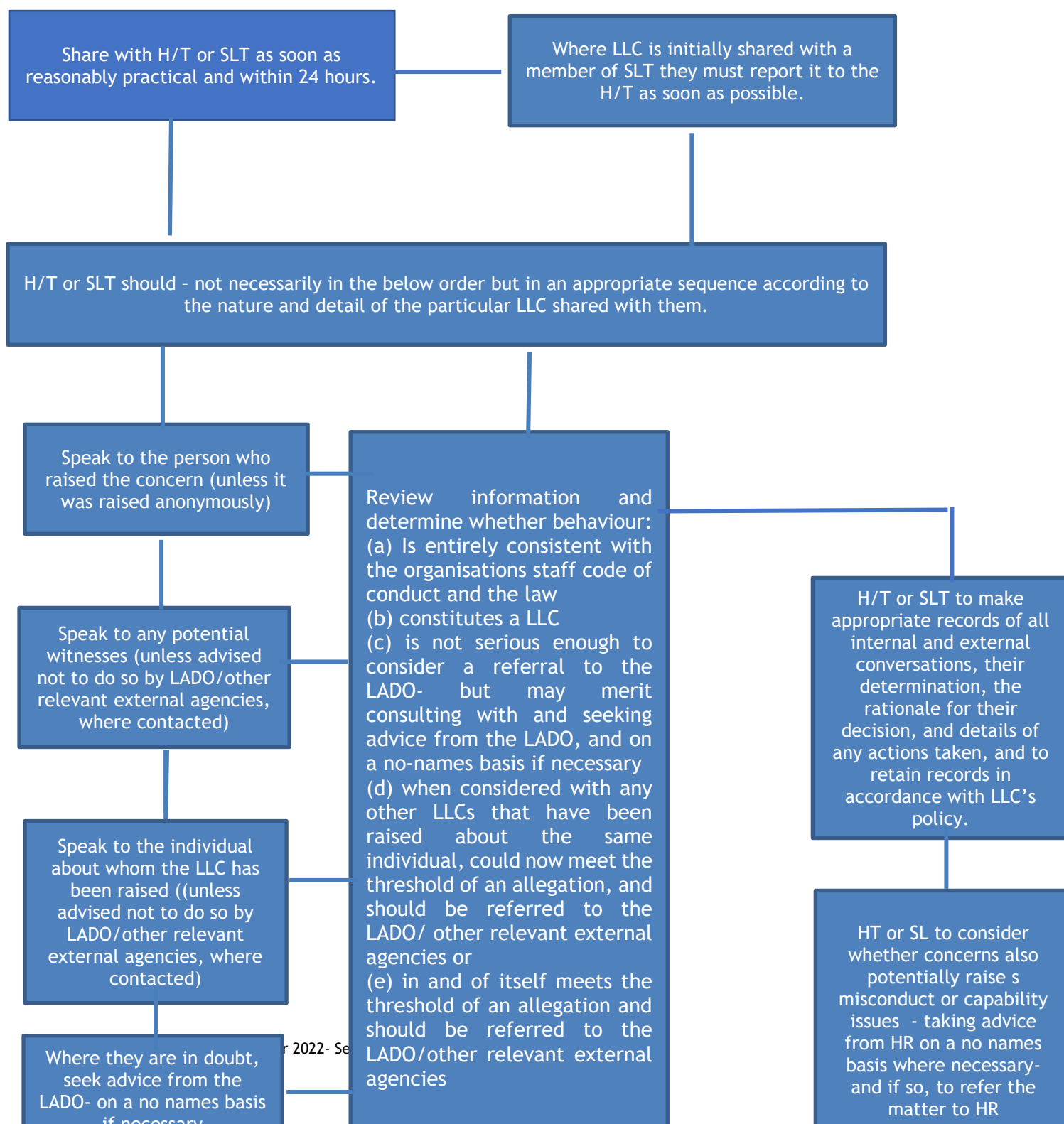
- Is inconsistent with an organisations' staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no names basis if necessary.

## Appropriate Conduct

Behaviour which is entirely consistent with the organisation's staff code of conduct, and the law

### 35 Appendix 8: Responding to a low-level concern

Keeping Children Safe in Education now requires low-level concerns to be shared with the Headteacher – unless they relate to the Headteacher



**36 Appendix 9: Low Level Concerns Form**

Please use this form to share any concerns – matters how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

Is inconsistent with The Ecclesbourne School’s code of conduct, including inappropriate conduct outside of work, and does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO

You should provide a concise record – including brief context in which the low-level concern arose., and details which are chronological, and as precise and accurate as possible- of any such concern and relevant incident(s). Please use a separate sheet if necessary.

The record should be signed, timed and dated.

<p><b>Concern reported by:</b></p> <p><b>Name of staff member</b></p> <p><b>Details of the concern</b></p>
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## 37 Appendix 10: Safer Recruitment and DBS checks – Policy and Procedures

### Recruitment and Selection Process;

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

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

### Advertising

When advertising roles, we will make clear;

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

### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns.

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

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

### Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed.

#### **Interview and selection;**

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
  - Explore any potential areas of concern to determine the candidate's suitability to work with children.
  - Record all information considered and decisions made
- Pre-appointment vetting checks

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

#### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 6 years afterwards –
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: criminal records checks for overseas applicants
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

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

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

#### **Existing staff**

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

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
  - We believe the individual has engaged in relevant conduct; or
  - We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
  - We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

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

### **Contractors**

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

#### **This will be:**

- An enhanced DBS check with barred list information for contractors engaging in regulated Activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

### **Trainee/student teachers**

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

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

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

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

- Obtain two references
- Check photographic identity
- Check they have right to work status
- If they have worked overseas we will check for any issues with the legal system in that country.

### **Governors**

All trustees, local governors and members will have an enhanced DBS check with or without barred list information depending on the amount of time they spend with our students;

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

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008). Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.

### **All governors will also have the following checks:**

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

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

### **Adults who supervise students on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. This includes working with Derbyshire Local Authority who check all work experience placements and endorse them. Where a placement is not through Derbyshire then the parents will take responsibility for the wellbeing of their child.

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

### **Students staying with host families**

Where the school makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are



undertaken prior to the visit.