

## **Bourne Education Trust**

### **Safeguarding and Child Protection Policy 2019-20**

School name: Jubilee High School

Safeguarding Governor: Caroline Dibnah

Designated Safeguarding Lead: Alison Reid

Status & review cycle: Statutory Annual

Next review date: September 2020

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## Safeguarding statement 2019-20

Bourne Education Trust (BET) recognises that academies and academy personnel are in a unique position in the care of children. The responsibility for all staff to safeguard pupils and promote their welfare as stated in **sections 157 and 175 of the Education Act (2002)** is one that is central to our ethos, policies and actions.

All young people are deserving of the highest levels of care and safeguarding, regardless of their individual characteristics or circumstances, and we are committed to applying this policy to ensure effective levels of safeguarding and care are afforded to all our pupils.

### It could happen here and what if I'm right?

We make every effort to provide an environment in which children and adults feel safe, secure, valued and respected, and feel confident to talk if they are worried, believing they will be effectively listened to.

The purpose of this policy is to provide staff, volunteers and governors with the framework they need in order to keep children safe and secure in our schools. The policy also informs parents and carers how we will safeguard their children whilst they are in our care.

The contents of this policy are intended to be in accordance with all relevant government guidelines and legislation as well as the inter-academy procedures of the relevant local Safeguarding Children's Partnership.

### Key school personnel:

Designated Safeguarding Lead (DSL):	Alison Reid – a.reid@jubileehigh.surrey.sch.uk
Deputy DSL:	Louisa Merrall – l.merrall@jubileehigh.surrey.sch.uk
The Nominated Child Protection Governor:	Caroline Dibnah – clerk@jubileehigh.surrey.sch.uk
The Online Safety Co-ordinator:	Michael Gobey – m.gobey@jubileehigh.surrey.sch.uk
The Headteacher:	Mark Conroy – m.conroy@jubileehigh.surrey.sch.uk
The Chair of Governors:	Tony Oakden – clerk@jubileehigh.surrey.sch.uk
BET Trustee with oversight of safeguarding:	Susan Gibbin (contact via Epsom and Ewell High School: 0208 974 0400)

## Terminology

Safeguarding and promoting the welfare of children is defined as:

- Protecting children 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;
- Taking action to enable all children to have the best outcomes.

**Child Protection** is a part of safeguarding and promoting welfare. It refers to the activity that is undertaken to protect specific children who are suffering, or are likely to suffer significant harm.

**Early Help** means the providing support as soon as additional needs emerge at any point in a child's life.

**Staff** refers to all those working for or on behalf of the school, full or part time, temporary or permanent, in either a paid or voluntary capacity.

**Child(ren)** includes everyone under the age of 18. On the whole, this will apply to students of our schools; however, the policy will extend to visiting children and students from other establishments.

**C-SPA** refers to the Children's Single Point of Access and the Child Protection Consultation Line (Surrey).

**DSL/DSP** (Designated Safeguarding Lead) / (Designated Senior Person) is the person who coordinates child safeguarding concerns and makes referrals.

**Parents** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**Social Care** refers to Children's Services in the area in which the child is resident, unless a child is a Child Looked After then this will be the Children's Services in their home authority.

**MASH** refers to the local authority Multi Agency Safeguarding Hub.

## Introduction

This policy has been developed in accordance with the principles established by the **Children Acts 1989 and 2004; the Education Act 2002**, and in line with statutory guidance: **'Working Together to Safeguard Children' 2018**, revised safeguarding statutory guidance **'Framework for the Assessment of Children in Need and their Families' 2000**, **'What to do if You are Worried a Child is Being Abused' 2015**.

The policy also reflects both statutory guidance **Keeping Children Safe in Education' 2019 (KCSIE)**, and Surrey Safeguarding Children Partnership (SSCP), Hampshire Safeguarding Children Partnership (HSCP) and Kingston and Richmond Safeguarding Children Partnership (KRSCP) procedures.

Bourne Education Trust Schools' governing committees take seriously their responsibility under **section 157 and 175 of the Education Act 2002** to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are robust arrangements within our school to identify, assess, and support those children who are suffering harm or at risk of suffering harm.

This policy applies to all members of staff and governors within BET schools.

### **Policy principles, values and aims**

- The welfare of the child is paramount.
- Maintain an attitude of "It could happen here".
- Children have a right to feel safe and secure; they cannot learn effectively unless they do so.
- All children have a right to be protected from harm and abuse.
- All staff have a role in the prevention of harm and abuse and an equal responsibility to act immediately on any suspicion or disclosure that may indicate a child is at risk of harm, either in the school or in the community, taking into account contextual safeguarding, in accordance with statutory guidance.
- We acknowledge that working in partnership with other agencies protects children and reduces risk and so we will engage in partnership working to protect and safeguard children.
- Whilst BET schools will work openly with parents as far as possible, it reserves the right to contact Social Care or the police, without notifying parents if this is believed to be in the child's best interests.

### **Policy aims**

- To demonstrate the Trust's and each school's commitment with regard to safeguarding and child protection to pupils, parents and other partners.
- To raise the awareness of all teaching and non-teaching staff of their responsibilities to safeguard children through identifying and reporting possible cases of abuse.
- To enable schools to effectively contribute to Early Help, assessments of need and support for those children.
- To provide robust school systems and procedures that are followed by all members of each school community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, in particular Early Help providers, the police, Health and Social Care.
- To ensure that all staff working within each school who have substantial access to children have been checked as to their suitability, including verification of their identity, qualifications, and a satisfactory DBS check (according to KCSIE guidance), and a single central record is kept for audit.

We comply with the Disqualification under the Childcare Act 2006 guidance issued in August 2018.

### **Supporting children**

We recognise that school may provide a safe place and the only stability in the lives of children who have been abused or who are at risk of harm.

We recognise that a child who is abused or witnesses abuse and/or violence may feel helpless and humiliated, may blame themselves, and find it difficult to develop and maintain a sense of self-worth.

We accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

The Trust and our schools will support all children through:

- Promoting a caring, safe and positive environment within the school.
- Encouraging self-esteem and self-assertiveness, through the curriculum and through positive relationships within the school community.
- Ensuring children are taught to understand and manage risk through personal, social, health and economic (PSHE) education and relationship and sex education (RSE) and through all aspects of school life. This includes online safety.
- Responding sympathetically to any requests for time out to deal with distress and anxiety. We will offer details of helplines, counselling or other avenues of external support.
- Liaising and work in partnership with other support services and agencies involved in Early Help and the safeguarding of children.
- Notifying Social Care immediately if there is a significant concern.
- Providing continuing support to a child about whom there have been concerns who leaves a BET school by ensuring that information is shared under confidential cover to the child's new setting and ensure the school medical records are forwarded as a matter of priority and within statutory timescales.

### **Prevention / protection**

We recognise that the school plays a significant part in the prevention of harm to our children by providing children with good lines of communication with trusted adults, supportive friends and an ethos of protection.

The Trust and our schools will:

- Establish and maintain an ethos where children feel safe and secure, are encouraged to talk and are always listened to.
- Include regular consultation with children e.g. through questionnaires, participation in anti-bullying activity, and asking children to report whether they have had happy/sad lunchtimes.
- Ensure that all children know there is access to an adult in the school whom they can approach if they are worried or in difficulty.
- Include safeguarding opportunities across the curriculum, which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help. In particular, this will include anti-bullying work, online-safety, accessing emergency services, road safety,

pedestrian and cycle training. Trust schools also schedule focussed work in year 6 to prepare for transition to secondary school and personal safety/independent travel.

- Ensure all staff are aware of school guidance for their use of mobile technology and have discussed safeguarding issues around the use of mobile technologies and their associated risks.

### **Safe school, safe staff**

We will ensure that:

- BET schools operate a safer recruitment procedure that includes statutory checks on staff suitability to work with children.
- All staff receive information about the school's safeguarding arrangements, the BET Code of Conduct, BET Staff ICT Policy and BET Safeguarding Policy, the role and names of the Designated Safeguarding Lead and their deputy(s), and **Keeping Children Safe in Education part 1 and annex A**, and will sign to confirm they have read and understood it. All Governing Committee members will sign to confirm they have read part 2 of the same guidance.
- All staff receive safeguarding, child protection and online safety training at induction, including reporting concerns, in line with advice from their local Safeguarding Children Partnership, which is regularly updated and receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually.
- The BET Safeguarding Policy is made available via the school website and parents/carers are made aware of this policy, and details of staff members with responsibility for safeguarding.
- We provide a coordinated offer of Early Help when additional needs of children are identified and contribute to early help arrangements and inter-agency working and plans.
- Our lettings policy will seek to ensure the suitability of adults working with children on school sites at any time.
- Community users organising activities for children are aware of the school's Safeguarding Policy, guidelines and procedures.

### **Roles and responsibilities**

All BET staff have a key role to play in identifying concerns early and in providing help for children. To achieve this, they will:

- Know how to respond to a student who discloses harm or abuse.
- Record their concerns if they are worried that a child is being abused and report these to the DSL immediately that day. If the DSL is not contactable immediately a Deputy DSL should be informed. Be prepared to refer directly to the Children's Single Point of Access (C-SPA) in Surrey or Multi-Agency Safeguarding Hub (MASH) in Hampshire or Richmond, and the police if appropriate, if there is a risk of significant harm and the DSL or their Deputy is not available.
- Follow the allegations procedures (page 16) if the disclosure is an allegation against a member of staff.
- Follow the procedures set out by the local Safeguarding Children Partnership and take account of guidance issued by the Department for Education.
- Provide support for children subject to Early Help, Child in Need or Child Protection that is in keeping with their plan.



- Treat information with confidentiality but never promising to “keep a secret”.
- Notify the DSL or their Deputy of any child on a child protection plan or child in need plan who has unexplained absence. Have an understanding of Early Help, and be prepared to identify and support children who may benefit from Early Help.
- Identify children who may benefit from Early Help, liaising with the DSL in the first instance (options may include managing support for the child internally via the school’s pastoral support process or an Early Help assessment). In some circumstances it may be appropriate for a member of school staff to act as the lead professional in Early Help cases.
- Liaise with other agencies that support students and provide early help.
- Know who the DSL and Deputy DSLs are and know how to contact them.
- Be mindful that the **Teacher Standards** states that teachers should safeguard children’s well-being and maintain public trust in the teaching profession as part of their professional duties.
- Assist the Governing Committee and Headteacher in fulfilling their safeguarding responsibilities set out in legislation and statutory guidance.

### The Headteacher / Head of School

In addition to the role and responsibilities of all staff the Headteacher will ensure that:

- Their school fully contributes to inter-agency working in line with **Working Together to Safeguard Children 2018** guidance.
- The Safeguarding Policy and procedures are implemented and followed by all staff.
- All staff are aware of the role of the Designated Safeguarding Lead (DSL), including the identity of the DSL and any Deputy Safeguarding Leads.
- Sufficient time, training, support, funding, resources, including cover arrangements where necessary, are allocated to the DSL to carry out their role effectively, including the provision of advice and support to school staff on child welfare and child protection matters, to take part in strategy discussions/meetings and other inter-agency meetings and/or support other staff to do so; and to contribute to the assessment of children.
- Provide opportunities for a coordinated offer of early help when additional needs of children are identified.
- Ensure Deputy DSLs are trained to the same standard as the DSL and the role is explicit in their job description.
- Adequate and appropriate DSL cover arrangements are in place for any out of hours/out of term activity.
- Where there is a safeguarding concern that the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.
- Child-centred systems and processes are in place for children to express their views and give feedback.
- All staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistleblowing procedures.
- Students are provided with opportunities throughout the curriculum to learn about safeguarding, including keeping themselves safe online.
- Allegations or concerns against staff are dealt with in accordance with guidance from Department for Education (DfE), Surrey Safeguarding Children Partnership (SSCP), Hampshire

Safeguarding Children Partnership or Kingston and Richmond Safeguarding Children Partnership.

- Statutory requirements are met to make a referral to the Disclosure and Barring Service and additionally in the case of teaching staff the Teacher Regulation Agency where they think an individual has engaged in conduct that harmed (or is likely to harm) a child; or if the person otherwise poses a risk of harm to a child.

### **The Designated Safeguarding Lead (DSL), or Designated Senior Person (DSP)**

In addition to the role and responsibilities of all staff the DSL will:

- Hold the lead responsibility for safeguarding and child protection (including online safety) in their school; this responsibility cannot be delegated.
- Have an “it could happen here” approach to safeguarding.
- Liaise with the local authority and work in partnership with other agencies in line with **Working Together to Safeguard Children**.
- Manage and submit a referral for a child if there are concerns about suspected harm or abuse, to the Children’s Single Point of Access (C-SPA) or local equivalent, and act as a point of contact and support for school staff. Referrals in Surrey should be made securely by email to [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk) using the Request for Support Form. Urgent referrals should be made by telephone 0300 470 9100. See [Appendix 4](#) for other local authority safeguarding contact information.
- Report concerns that a student may be at risk of radicalisation or involvement in terrorism, following the Prevent Referral Process and use the Prevent Referral Form to refer cases by email to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk). If the matter is urgent the police must be contacted by dialling 999. In cases where further advice from the police is sought, dial 101 or 01483 632982 (in Surrey) and ask to speak to the Prevent Supervisor for Surrey. The Department for Education has also set up a dedicated helpline for staff and governors to raise concerns around Prevent (0207 340 7264). See **Appendix 4** for Prevent contact details in other local authorities.
- Refer cases where a crime may have been committed to the police as required.
- Liaise with the case manager and LADO for child protection concerns in cases which concern a member of staff or a volunteer; and refer cases where a person is dismissed or left service due to risk/harm to a child to the Disclosure and Barring Service and Teaching Regulation Agency, as required.
- Follow **DfE and KCSIE guidance ‘Peer on Peer Abuse’** when a concern is raised that there is an allegation of a pupil abusing another pupil within the school (see page 25).
- Be available during term time (during school hours) for staff in school to discuss any safeguarding concerns. Appropriate and adequate cover arrangements will be arranged by the DSL and the school leadership for any out of hours/term activities.
- Act as a source of support and expertise in carrying out safeguarding duties for the whole school community.
- Encourage and promote a culture of listening to children and taking account of their wishes and feelings, amongst all staff.

- Access training and support to ensure they have the knowledge and skills required to carry out the role. DSL training should be updated at least every two years and their knowledge and skills refreshed at regular intervals but at least annually.
- Have a secure working knowledge of the local Safeguarding Children Partnership procedures and understand the assessment process for providing Early Help and statutory intervention, including the local authority levels of need criteria and referral arrangements.
- Have a clear understanding of access and referral to the local Early Help offer and will support and advise members of staff where early help intervention is appropriate.
- Understand and support the school delivery with regards to the requirements of the Prevent Duty and provide advice and guidance to staff on protecting children from radicalisation.
- Liaise with school staff (especially pastoral support, behaviour leads, school health colleagues and the SENCO) on matters of safety and safeguarding and consult the SSCP Levels of Need document (Surrey) to inform decision making and liaison with relevant agencies.
- Be alert to the specific needs of Children in Need, those with SEND and young carers.
- Understand the risks associated with online activity and be confident that they have the up to date knowledge and capability to keep children safe whilst they are online at school; in particular, understand the additional risks that children with SEND face online and the associated and appropriate support they require.
- Keep detailed, accurate records (either written or using appropriate secure online software), that include all concerns about a child, even if there is no need to make an immediate referral, and the rationale for decisions made and action taken.
- Ensure that an indication of the existence of the additional child protection file is marked on the student school file record.
- Ensure that when a student transfers school, their child protection file is passed to the new school as soon as possible, and within statutory timescales (separately from the main student file and ensuring secure transit) and that confirmation of receipt is received.
- Ensure that where a student transfers school and is on a child protection plan or is a child looked after, their information is passed to the new school immediately and that the child's social worker is informed. In addition, consideration should be given to a multi-agency schools transition meeting if the case is complex or on-going.
- Ensure that a copy of the child protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy should then be securely destroyed.
- Ensure that all appropriate staff members have a working knowledge and understanding of their role in case conferences, core groups and other multi-agency planning meetings, to ensure that they attend and are able to effectively contribute when required to do so; where a report is required, this should be shared with the parents prior to the meeting.
- Report to the Headteacher any significant issues for example, use of the local Safeguarding Children Partnership multi-agency escalation procedures, enquiries under **section 47 of the Children Act 1989** and police investigations.
- Ensure that the case holding Social Worker is informed of any child currently with a child protection plan who is absent without explanation.
- Ensure that all staff sign to say they have read, understood and agree to work within the School's Safeguarding Policy, Staff Behaviour Policy (Code of Conduct) and **Keeping Children Safe in Education (KCSIE) Part 1 and annex A** and ensure that the policies are used effectively.

- Organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
- Ensure that in collaboration with the school leadership and governors, the Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly.
- Ensure that the Safeguarding Policy is available publicly and that parents are aware that referrals about suspected harm and abuse will be made and the role of the school in this. Establish and maintain links with the three safeguarding partners to make sure staff are aware of training opportunities and the latest policies on local safeguarding arrangements.
- Contribute to and provide, with the Headteacher and Chair of Governors, the “Audit of Statutory Duties and Associated Responsibilities” to be submitted annually to the Surrey County Council, Education Safeguarding Team, or satisfy other local requirements.
- Ensure that the name of the designated members of staff for child protection, the Designated Safeguarding Lead and Deputy DSLs, are clearly advertised in school, with a statement explaining the school’s role in referring and monitoring cases of suspected abuse.
- Meet all other responsibilities as set out for DSLs in **Keeping Children Safe in Education 2019**.

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

In addition to the role and responsibilities of all staff the Deputy DSL will:

- Be trained to the same standard as the Designated Safeguarding Lead and the role is explicit in their job description.
- Provide support and capacity to the DSL in carrying out delegated activities of the DSL; however, the lead responsibility of the DSL cannot be delegated.
- In the absence of the DSL, carry out the activities necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the DSL, the Deputy will assume all of the functions above.

### **Governors**

All members of BET schools’ Governing Committees understand and fulfil their responsibilities to ensure that:

- Their school has effective safeguarding policies and procedures including a Safeguarding Policy, a Code of Conduct, a Behaviour Policy and a response to children who go missing from education. Ensure policies are consistent with the local Safeguarding Children Partnership (SCP) and statutory requirements, are reviewed annually and that the Safeguarding Policy is available on their school’s website.
- The local SCP is informed in line with local requirements about the discharge of duties via the annual safeguarding audit.
- Their school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children and disqualification by association regulations and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training. If there is not a panel conducting interviews then the individual will have completed the safer recruitment training.

- At least one member of the governing body has completed safer recruitment training - to be repeated every five years.
- Staff have been trained appropriately and this is updated in line with guidance and all staff have read **Keeping Children Safe in Education (2019) part 1 and Annex A** and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance. That all staff, including temporary staff and volunteers, are provided with the school's Safeguarding Policy and Staff Code of Conduct.
- Their school has procedures for dealing with allegations of abuse against staff (including the Headteacher), volunteers and against other children and that a referral is made to the DBS and/or the Teaching Regulation Agency (as applicable) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned.
- That a nominated governor for safeguarding is identified.
- That a member of the senior leadership team has been appointed by the Governing Committee as the Designated Safeguarding Lead (DSL) who will take lead responsibility for safeguarding and child protection and that the role is explicit in the role holder's job description.
- That on appointment, the DSL and Deputy DSLs undertake interagency training (SSCP Foundation Modules 1&2 or equivalent) and also undertake DSL 'New to Role' and 'Update' training every two years, as well as attending DSL network events to refresh knowledge and skills.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and relationship and sex education (RSE).
- Their school will comply with DfE and local authority Children Missing Education requirements.
- Their school will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable That appropriate online filtering and monitoring systems are in place.
- Enhanced DBS checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all Governors.
- That any weaknesses in safeguarding are remedied immediately.

### **BET Board**

In order to ensure the Bourne Education Trust and its schools actively promote the welfare and safety of all its students and staff, the BET Board will, through a Board Trustee with oversight of safeguarding, monitor the quality of safeguarding practices and policies and their impact on outcomes for students by:

- Reviewing the BET Safeguarding Policy and procedures to ensure all schools are meeting their statutory responsibilities under relevant, current legislation.
- Reviewing the processes through which students are taught about safeguarding, including online safety, radicalisation and CSE as appropriate to their age.

- Reviewing a selection of significant safeguarding incidents, including actions taken and outcomes for the young person involved.
- Review a selection of Trust and school safeguarding training plans.
- Keeping the Board updated as appropriate.

## Confidentiality and Sharing Information

All matters relating to child protection will be treated as confidential and only shared as per the **'Information Sharing Advice for Practitioners'** (DfE 2018) guidance.

Information will be shared with staff within the school who 'need to know'.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and that the **Data Protection Act 2018** and **General Data Protection Regulation** are not a barrier to sharing information where a failure to do so would place a child at risk of harm. There is a lawful basis for child protection concerns to be shared with agencies who have a statutory duty for child protection.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or wellbeing. However, staff are aware that matters relating to child protection and safeguarding are personal to children and families, in this respect they are confidential and the Headteacher or DSLs will only disclose information about a child to other members of staff on a need to know basis.

All staff will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation.

## Child Protection Procedures

The following procedures apply to all staff working in BET schools and will be covered by training to enable staff to understand their role and responsibilities. The aim of these procedures is to provide a robust framework which enables staff to take appropriate action when they are concerned that a child is being harmed or abused or is at risk of harm or abuse.

The prime concern at all stages must be the interests and safety of the child. Where there is a conflict of interest between the child and an adult, the interests of the child must be paramount.

All staff need to be aware that very young children and those with disabilities, special needs or with language delay may be more likely to communicate concerns with behaviours rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility.

**If a member of staff suspects abuse, spots signs or indicators of abuse, or they have a disclosure of abuse made to them they must:**

1. Make an initial record of the information related to the concern.
2. Report it to the DSL immediately.
3. The DSL will consider if there is a requirement for immediate medical intervention, however urgent medical attention should not be delayed if the DSL is not immediately available.
4. Make an accurate record (which may be used in any subsequent court proceedings) as soon as possible and within 24 hours of the occurrence, of all that has happened, including details of:
  - Dates and times of their observations
  - Dates and times of any discussions in which they were involved
  - Any injuries
  - Explanations given by the child/adult
  - Rationale for decision making and action taken
  - Any actual words or phrases used by the child
5. The records must be signed and dated by the author or equivalent on electronic based records.
6. In the absence of the DSL or their Deputy, staff must be prepared to refer directly to C-SPA or local equivalent (and the police if appropriate) if there is the potential for immediate significant harm.

**Following a report of concerns the DSL must:**

1. Using the local Safeguarding Children Partnership Levels of Need, decide whether or not there are sufficient grounds for suspecting significant harm, in which case a referral must be made to the C-SPA or local equivalent and the police if it is appropriate.
2. Try to discuss any concerns about a child's welfare with the family and where possible to seek their agreement before making a referral to the C-SPA or local equivalent. However, this should only be done when it will not place the child at increased risk or could impact a police investigation. The child's views should also be taken into account.

If there are grounds to suspect a child is suffering, or is likely to suffer, significant harm or abuse the DSL must contact the C-SPA or local equivalent by sending a Request for Support Form by email to: [csmarsh@surreycc.gov.uk](mailto:csmarsh@surreycc.gov.uk) or contact the C-SPA on 0300 470 9100 or local equivalent. If a child is in immediate danger and urgent protective action is required, the police (dial 999) must be called. The DSL must also notify C-SPA or local equivalent of the occurrence and the action taken.

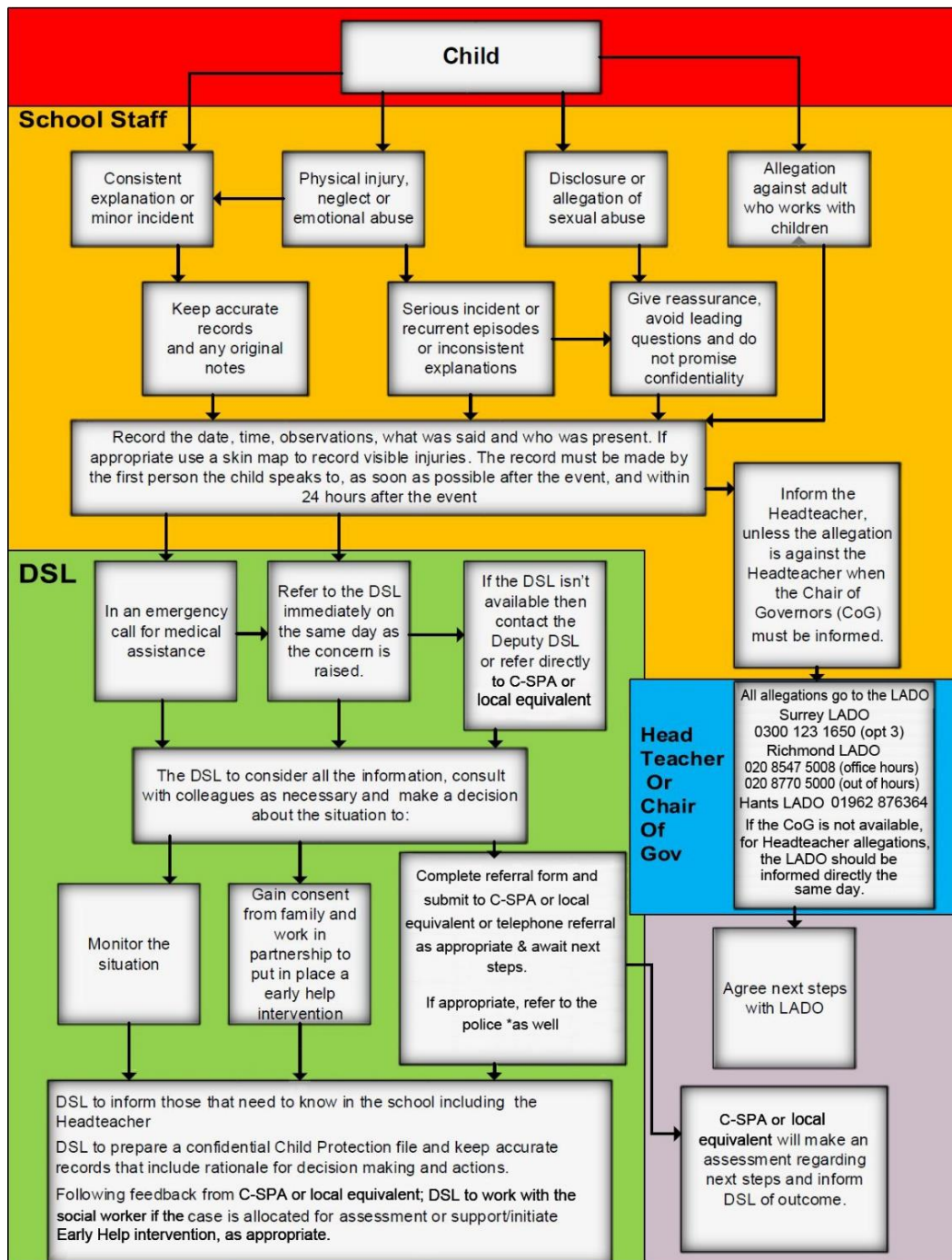
3. If the DSL feels unsure about whether a referral is necessary, they can phone the C-SPA or local equivalent to discuss concerns.
4. If there is not a risk of significant harm, the DSL will either actively monitor the situation or consider Early Help.
5. Where there are doubts or reservations about involving the child's family, the DSL should clarify with the C-SPA or local equivalent or the police whether the parents should be told about the referral and, if so, when and by whom. This is important in cases where the police may need to conduct a criminal investigation.
6. When a pupil is in need of urgent medical attention and there is suspicion of abuse the DSL or their Deputy should take the child to the accident and emergency unit at the nearest hospital,

having first notified the C-SPA or local equivalent. The DSL should seek advice about what action the C-SPA or local equivalent will take and about informing the parents, remembering that parents should normally be informed that a child requires urgent hospital attention.

7. The exception to this process will be in those cases of known FGM where there is a mandatory requirement for the teacher to report directly to the police. The DSL should also be made aware.



## Child Protection Flowchart



\* In the cases of known FGM, the teacher who was made aware will also make contact with the police

## Dealing with disclosures

### All staff

A member of staff who is approached by a child should listen positively and try to reassure them. They cannot promise complete confidentiality and should explain that they may need to pass information

to other professionals to help keep the child or other children safe. The degree of confidentiality should always be governed by the need to protect the child.

Additional consideration needs to be given to children with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

All staff should know who their DSL is and who to approach if the DSL is unavailable. All staff have the right to make a referral to the C-SPA or local equivalent or police directly and should do this if, for whatever reason, there are difficulties following the agreed protocol, for example, they are the only adult on the school premises at the time and have concerns about sending a child home.

### **Guiding principles: the seven R's**

#### **Receive**

- Listen to what is being said, without displaying shock or disbelief
- Accept what is said and take it seriously
- Make a note of what has been said as soon as practicable.

#### **Reassure**

- Reassure the pupil, but only so far as is honest and reliable
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or 'everything will be alright now' or 'I'll keep this confidential'
- Do reassure, for example, you could say: 'I believe you', 'I am glad you came to me', 'I am sorry this has happened', 'We are going to do something together to get help'.

#### **Respond**

- Respond to the pupil only as far as is necessary for you to establish whether or not you need to refer this matter, but do not interrogate for full details
- Do not ask 'leading' questions i.e. 'did he touch your private parts?' or 'did she hurt you?' Such questions may invalidate your evidence (and the child's) in any later prosecution in court
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her, and reconciliation may be possible.
- Do not ask the pupil to repeat it all for another member of staff. Explain what you have to do next and whom you have to talk to. Reassure the pupil that it will be a senior member of staff.

#### **Report**

- Share concerns with the DSL immediately
- If you are not able to contact your DSL or the Deputy DSL, and the child is at risk of immediate harm, contact the C-SPA or local equivalent or police, as appropriate directly
- If you are dissatisfied with the level of response you receive following your concerns, you should press for re-consideration.

### **Record**

- If possible make some very brief notes at the time, and write them up as soon as possible
- Keep your original notes on file
- Record the date, time, place, persons present and noticeable nonverbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used, rather than translating them into 'proper' words
- If appropriate, complete a body map to indicate the position of any noticeable bruising
- Record facts and observable things, rather than your 'interpretations' or 'assumptions'.

### **Remember**

- Support the child: listen, reassure, and be available
- Complete confidentiality is essential. Share your knowledge only with appropriate professional colleagues
- Get some support for yourself if you need it.

### **Review** (led by DSL)

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?

### **What happens next?**

It is important that concerns are followed up and it is everyone's responsibility to ensure that they are. The member of staff should be informed by the DSL what has happened following a report being made. If they do not receive this information they should seek it out.

If the member of staff has concerns that the disclosure has not been acted upon appropriately s/he should inform the Headteacher or Safeguarding Governor of the school and/or contact the C-SPA or local equivalent.

Receiving a disclosure can be upsetting for the member of staff and schools should have a procedure for supporting them after the disclosure. This might include reassurance that they have followed procedure correctly and that their swift actions will enable the allegations to be handled appropriately.

In some cases, additional counselling might be needed and staff should be encouraged to recognise that disclosures can have an impact on their own emotions.

## **Allegations against adults who work with children**

### **Procedure**

This procedure should be used in all cases in which it is alleged a member of staff or volunteer in a school, or another adult who works with children has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headteacher immediately.
- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the LADO should be contacted directly – [see Appendix 4 for contact details](#).
- There may be situations when the Headteacher or Chair of Governors will want to involve the police immediately if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence.
- Once an allegation has been received by the Headteacher or Chair of Governors they will contact the LADO immediately on 0300 123 1650, option 3 LADO. Email: [LADO@surreycc.gov.uk](mailto:LADO@surreycc.gov.uk) and before taking any action or investigation. See Appendix 4 for other local authorities.
- Following consultation with the LADO, inform the parents of the allegation unless there is a good reason not to.

In liaison with the LADO, the school will determine how to proceed and if necessary the LADO will refer the matter to Children’s Social Care and/or the police.

If the matter is investigated internally, the LADO will advise the school to seek guidance from local authority colleagues in following procedures set out in **part 4 of ‘Keeping Children Safe in Education’ (2019)** and local SCP procedures.

## **What is child abuse?**

The following definitions are taken from **‘Working Together to Safeguard Children’** HM Government (2018). In addition to these definitions, it should be understood that children can also be abused by being sexually exploited, honour based violence, forced marriage or female genital mutilation. To support the local context, all staff have access to the SSCP ‘Effective Family Resilience Surrey’ document via the DSL.

## **What is abuse and neglect?**

Abuse and neglect are forms of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting, by those known to them or, more rarely, by a stranger. They may be abused by an adult or adults, or another child or children.

## **Physical abuse**

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

### **Emotional abuse**

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 in isolation.

### **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 (including online).

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

### **Neglect**

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

The SSCP Neglect Strategy and the Neglect Risk Assessment Tool ([see Appendix 2](#)) is available to provide a more detailed information regarding neglect.

## Indicators of abuse - neglect

### The nature of neglect

Neglect is a lack of parental care but poverty and lack of information or adequate services can be contributory factors.

Far more children are registered to the category of neglect on Child in Need and Child Protection plans than to the other categories. As with abuse, the number of children experiencing neglect is likely to be much higher than the numbers on the plans.

Neglect can include parents or carers failing to:

- Provide adequate food, clothing and shelter
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision or stimulation
- Ensure access to appropriate medical care or treatment.

NSPCC research has highlighted the following examples of the neglect of children under 12 years old:

- Frequently going hungry
- Frequently having to go to school in dirty clothes
- Regularly having to look after themselves because of parents being away or having problems such as drug or alcohol misuse
- Being abandoned or deserted
- Living at home in dangerous physical conditions
- Not being taken to the doctor when ill
- Not receiving dental care.

Neglect is a difficult form of abuse to recognise and is often seen as less serious than other categories. It is, however, very damaging: children who are neglected often develop more slowly than others and may find it hard to make friends and fit in with their peer group.

Neglect is often noticed at a stage when it does not pose a risk to the child. The duty to safeguard and promote the welfare of children (**What to do if You're Worried a Child is Being Abused**, DfE 2015) would suggest that an appropriate intervention or conversation at this early stage can address the issue and prevent a child continuing to suffer until it reaches a point when they are at risk of harm or in significant need. Neglect is often linked to other forms of abuse, so any concerns school staff should be discussed with the DSL.

### Indicators of neglect

The following is a summary of some of the indicators that may suggest a child is being abused or is at risk of harm.

It is important to recognise that indicators alone cannot confirm whether a child is being abused. Each child should be seen in the context of their family and wider community and a proper assessment carried out by appropriate persons. What is important to keep in mind is that if you feel unsure or concerned, do something about it. Don't keep it to yourself. The Neglect Risk Assessment Tool ([see Appendix 2](#)) provides staff with a resource to identify and act on concerns regarding neglect.

Physical indicators of neglect:

- Constant hunger and stealing food
- Poor personal hygiene - unkempt, dirty or smelly
- Underweight
- Dress unsuitable for weather
- Poor state of clothing
- Illness or injury untreated.

Behavioural indicators of neglect:

- Constant tiredness
- Frequent absence from school or lateness
- Missing medical appointments
- Isolated among peers
- Frequently unsupervised
- Stealing or scavenging, especially food
- Destructive tendencies.

## **Indicators of abuse – emotional abuse**

### **The nature of emotional abuse**

Most harm is produced in *low warmth, high criticism homes*, not from single incidents. Emotional abuse is difficult to define, identify/recognise and/or prove. Emotional abuse is chronic and cumulative and has a long-term impact.

All kinds of abuse and neglect have emotional effects although emotional abuse can occur by itself.

Children can be harmed by witnessing someone harming another person – as in domestic abuse.

It is sometimes possible to spot emotionally abusive behaviour from parents and carers to their children by the way that the adults are speaking to, or behaving towards children. An appropriate challenge or intervention could affect positive change and prevent more intensive work being carried out later on.

### **Indicators of emotional abuse**

Developmental issues:

- Delays in physical, mental and emotional development
- Poor school performance
- Speech disorders, particularly sudden disorders or changes.

Behaviour:

- Acceptance of punishment which appears excessive
- Over-reaction to mistakes
- Continual self-deprecation (I'm stupid, ugly, worthless etc.)
- Neurotic behaviour (such as rocking, hair-twisting, thumb-sucking)
- Self-mutilation
- Suicide attempts
- Drug/solvent abuse
- Running away
- Compulsive stealing, scavenging
- Acting out
- Poor trust in significant adults
- Regressive behaviour – e.g. wetting
- Eating disorders
- Destructive tendencies
- Neurotic behaviour
- Arriving early at school, leaving late.

Social issues:

- Withdrawal from physical contact
- Withdrawal from social interaction
- Over-compliant behaviour
- Insecure, clinging behaviour
- Poor social relationships.

Emotional responses:

- Extreme fear of new situations
- Inappropriate emotional responses to painful situations (“I deserve this”)
- Fear of parents being contacted
- Self-disgust
- Low self-esteem
- Unusually fearful with adults
- Lack of concentration, restlessness, aimlessness
- Extremes of passivity or aggression.

## **Indicators of abuse – physical abuse**

### **The nature of physical abuse**



Most children collect cuts and bruises quite routinely as part of the rough and tumble of daily life. Clearly, it is not necessary to be concerned about most of these minor injuries. But accidental injuries normally occur on the bony prominences – e.g. knees, shins, elbows.

Injuries on the soft areas of the body are more likely to be inflicted intentionally and should therefore make us more alert to other concerning factors that may be present.

A body map can assist in the clear recording and reporting of physical abuse. The body map should only be used to record observed injuries and no child should be asked to remove clothing by a member of staff of the school.

**Indicators of physical abuse / factors that should increase concern:**

- Multiple bruising or bruises and scratches (especially on the head and face)
- Clusters of bruises – e.g., fingertip bruising (caused by being grasped)
- Bruises around the neck and behind the ears – the most common abusive injuries are to the head
- Bruises on the back, chest, buttocks, or on the inside of the thighs
- Marks indicating injury by an instrument – e.g. linear bruising (stick), parallel bruising (belt), marks of a buckle
- Bite marks
- Deliberate burning may also be indicated by the pattern of an instrument or object – e.g. electric fire, cooker, cigarette
- Scalds with upward splash marks or tide marks
- Untreated injuries
- Recurrent injuries or burns
- Bald patches.

In the context of the school, it is normal to ask about a noticeable injury. The response to such an enquiry is generally light-hearted and detailed. So, most of all, concern should be increased when:

- The explanation given does not match the injury
- The explanation uses words or phrases that do not match the vocabulary of the child (adult's words)
- No explanation is forthcoming
- The child (or the parent/carer) is secretive or evasive
- The injury is accompanied by allegations of abuse or assault.

You should be concerned if a child:

- Is reluctant to have parents/carers contacted
- Runs away or shows fear of going home
- Is aggressive towards themselves or others
- Flinches when approached or touched
- Is reluctant to undress to change clothing for sport
- Wears long sleeves during hot weather
- Is unnaturally compliant in the presence of parents/carers

- Has a fear of medical help or attention
- Admits to a punishment that appears excessive.

## Indicators of abuse – sexual abuse

### The nature of sexual abuse

Sexual abuse is often perpetrated by people who are known and trusted by the child – e.g. relatives, family friends, neighbours, babysitters, and people working with the child in school, faith settings, clubs or activities. Children can also be subject to child sexual exploitation.

Sexual exploitation is seen as a separate category of sexual abuse.

Characteristics of child sexual abuse:

- It is often planned and systematic – people do not sexually abuse children by accident, though sexual abuse can be opportunistic
- Grooming the child – people who abuse children take care to choose a vulnerable child and often spend time making them dependent (this may occur online)
- Grooming the child's environment – abusers try to ensure that potential adult protectors (parents and other carers especially) are not suspicious of their motives.

Most people who sexually abuse children are men, but some women sexually abuse too.

### Indicators of sexual abuse

Physical observations:

- Damage to genitalia, anus or mouth
- Sexually transmitted diseases
- Unexpected pregnancy, especially in very young girls
- Soreness in genital area, anus or mouth and other medical problems such as chronic itching
- Unexplained recurrent urinary tract infections and discharges or abdominal pain.

Behavioural observations:

- Sexual knowledge inappropriate for age
- Sexualised behaviour or affection inappropriate for age
- Sexually inappropriate behaviour
- Hinting at sexual activity
- Inexplicable decline in education progress
- Depression or other sudden apparent changes in personality as becoming insecure
- Lack of concentration, restlessness, aimlessness
- Socially isolated or withdrawn
- Overly-compliant behaviour
- Acting out, aggressive behaviour
- Poor trust or fear concerning significant adults
- Regressive behaviour

- Onset of wetting, by day or night; nightmares
- Arriving early at school, leaving late, running away from home
- Suicide attempts, self-mutilation
- Suddenly drawing sexually explicit pictures
- Eating disorders or sudden loss of appetite or compulsive eating
- Regressing to younger behaviour patterns such as thumb sucking or bringing out discarded cuddly toys
- Become worried about clothing being removed
- Trying to be 'ultra-good' or perfect; overreacting to criticism.

## Peer on peer abuse – policy framework

### Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their education attainment as well as their emotional well-being. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

### Policy

We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults and other children in school.

We recognise that children are capable of abusing their peers and this will be dealt with under our Safeguarding Policy and in line with **KCSIE (2019)**.

We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

**We will minimise the risk of peer on peer abuse by: -**

#### Prevention:

- Taking a whole school approach to safeguarding and child protection
- Providing training to staff

- Providing a clear set of values and standards, underpinned by the school's Behaviour Policy and pastoral support; and by a planned programme of evidence-based content delivered through the curriculum
- Engaging with specialist support and interventions.

**Responding to reports of sexual violence and sexual harassment:**

- Children making a report of sexual violence or sexual harassment including "upskirting" (which is a criminal offence) will be taken seriously, kept safe and be well supported
- If the report includes an online element, staff will be mindful of the **Searching, Screening and Confiscation: advice for schools (DfE 2018)** guidance
- Staff taking the report will inform the DSL or the Deputy DSL immediately
- Staff taking a report will never promise confidentiality
- Parents or carers should usually be informed (unless this would put the child at greater risk).

If a child is at risk of harm, is in immediate danger, or has been harmed, a request for support will be made to the C-SPA or local equivalent. Email: [csmash@surreycc.gov.uk](mailto:csmash@surreycc.gov.uk) or telephone 0300 470 9100, as appropriate (for other local authority contact details – see [Appendix 4](#)).

**Risk Assessment: -**

Following a referral, the DSL will make an immediate risk and needs assessment on a case by case basis. The risk assessment will consider:

- The victim, especially their protection and support
- The alleged perpetrator, their support needs and any discipline action
- All other children at the school
- The victim and the alleged perpetrator sharing classes and space at school.

The risk assessment will be recorded and kept under review.

Where there has been other professional intervention and/or other specialist risk assessments, these professional assessments will be used to inform the school's approach to supporting and protecting pupils.

Support regarding risk assessments can be accessed from the Education Safeguarding Team – [education.safeguarding@surreycc.gov.uk](mailto:education.safeguarding@surreycc.gov.uk) - for other local authorities see contact details in [Appendix 4](#).

**Action: The DSL will consider: -**

- The wishes of the victim
- The nature of the incident including whether a crime has been committed and the harm caused
- Ages of the children involved
- Developmental stages of the children
- Any power imbalance between the children
- Any previous incidents

- Ongoing risks
- Other related issues or wider context.

#### **DSL Options:**

- Manage internally
- Early Help intervention
- Refer to C-SPA or local equivalent
- Report to the police (generally in parallel with a referral to C-SPA or local equivalent).

#### **Ongoing Response:**

- The DSL will manage each case individually and will ensure the risk assessment is reviewed regularly with relevant partner agencies, for example the police and Children's Social Care.
- Where there is a criminal investigation into a rape, assault by penetration or sexual assault, the alleged perpetrator should be removed from any classes they share with the victim.
- The DSL will consider how best to keep the victim and perpetrator a reasonable distance apart on school premises and on transport where appropriate.
- Where a criminal investigation into a rape or assault by penetration leads to a conviction or caution, the school will take suitable action. In all but the most exceptional of circumstances, the rape or assault is likely to constitute a serious breach of discipline and may lead to the view that allowing the perpetrator to remain in the same school or college would seriously harm the education or welfare of the victim (and potentially themselves and other pupils).
- Where a criminal investigation into sexual assault leads to a conviction or caution, the school or college will, if it has not already, consider any suitable sanctions in light of their behaviour policy, which may include consideration of permanent exclusion. Where the perpetrator is going to remain at the school or college, the Headteacher should continue keeping the victim and perpetrator in separate classes and continue to consider the most appropriate way to manage potential contact on school and college premises and transport. The nature of the conviction or caution and wishes of the victim will be especially important in determining how to proceed in such cases.
- The victim, alleged perpetrator and any other affected children and adults will receive appropriate support and safeguards on a case by case basis.
- The school will take any disciplinary action against the alleged perpetrator in accordance with the school behaviour policy.
- The school recognises that taking disciplinary action and providing appropriate support are not mutually exclusive actions and will occur at the same time if necessary.

#### **Physical Abuse**

While a clear focus of peer on peer abuse is around sexual abuse and harassment, physical assaults and initiation violence and rituals between students can also be abusive. These are equally not tolerated and if it is believed that a crime has been committed, will be reported to the police.

The principles from the anti-bullying policy will be applied in these cases, with recognition that any police investigation will need to take priority.

## References:

DfE Keeping Children Safe in Education 2019

DfE Sexual Violence and Sexual Harassment between Children in Schools and Colleges, May 2018

## Harmful sexual behaviour: Brook Sexual Behaviours Traffic Light Tool

The **Brook Traffic Light Tool** uses a traffic light system to categorise the sexual behaviours of young people and is designed to help professionals:

- Make decisions about safeguarding children and young people
- Assess and respond appropriately to sexual behaviour in children and young people
- Understand healthy sexual development and distinguish it from harmful behaviour
- By categorising sexual behaviours, schools can work with other agencies to the same standardised criteria when making decisions and can protect children and young people with a multi-agency approach.

BET and its schools recognise that it is vital that professionals agree on how behaviours should be categorised regardless of culture, faith, beliefs, and their own experiences or values.

All green, amber and red behaviours require some form of attention and response. It is the level of intervention that will vary.

### Green Behaviours

#### What is a green behaviour?

Green behaviours reflect safe and healthy sexual development. They are displayed between children or young people of similar age or developmental ability and reflective of natural curiosity, experimentation, consensual activities and positive choices.

#### What can you do?

Green behaviours provide opportunities to give positive feedback and additional information.

#### Green behaviours 0-5

- Holding or playing with own genitals
- Attempting to touch or curiosity about other children's genitals
- Attempting to touch or curiosity about breasts, bottoms or genitals of adults
- Games e.g. mummies and daddies, doctors and nurses
- Enjoying nakedness
- Interest in body parts and what they do
- Curiosity about the differences between boys and girls.

#### Green behaviours 5-9

- Feeling and touching own genitals
- Curiosity about other children's genitals

- Curiosity about sex and relationships, e.g. differences between boys and girls, how sex happens, where babies come from, same-sex relationships
- Sense of privacy about bodies
- Telling stories or asking questions using swear and slang words for parts of the body.

### Green behaviours 9-13

- Solitary masturbation
- Use of sexual language including swear and slang words
- Having girl/boyfriends who are of the same, opposite or any gender
- Interest in popular culture, e.g. fashion, music, media, online games, chatting online
- Need for privacy
- Consensual kissing, hugging, holding hands with peers.

### Green behaviours 13-17

- Solitary masturbation
- Sexually explicit conversations with peers
- Obscenities and jokes within the current cultural norm
- Interest in erotica/pornography
- Use of internet/e-media to chat online
- Having sexual or non-sexual relationships
- Sexual activity including hugging, kissing, holding hands
- Consenting oral and/or penetrative sex with others of the same or opposite gender who are of similar age and developmental ability
- Choosing not to be sexually active.

## Amber Behaviours

### What is an amber behaviour?

Amber behaviours have the potential to be outside of safe and healthy behaviour. They may be of potential concern due to age, or developmental differences. A potential concern due to activity type, frequency, duration or context in which they occur.

### What can you do?

Amber behaviours signal the need to take notice and gather information to assess the appropriate action.

### Amber behaviours 0-5

- Preoccupation with adult sexual behaviour
- Pulling other children's pants down/skirts up/trousers down against their will
- Talking about sex using adult slang
- Preoccupation with touching the genitals of other people
- Following others into toilets or changing rooms to look at them or touch them
- Talking about sexual activities seen on TV/online.

### Amber behaviours 5-9

- Questions about sexual activity which persist or are repeated frequently, despite an answer having been given
- Sexual bullying face to face or through texts or online messaging
- Engaging in mutual masturbation
- Persistent sexual images and ideas in talk, play and art
- Use of adult slang language to discuss sex.

### Amber behaviours 9-13

- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Verbal, physical or cyber/virtual sexual bullying involving sexual aggression
- LGBT (lesbian, gay, bisexual, transgender) targeted bullying
- Exhibitionism, e.g. flashing or mooning
- Giving out contact details online
- Viewing pornographic material
- Worrying about being pregnant or having STIs.

### Amber behaviours 13-17

- Accessing exploitative or violent pornography
- Uncharacteristic and risk-related behaviour, e.g. sudden and/or provocative changes in dress, withdrawal from friends, mixing with new or older people, having more or less money than usual, going missing
- Concern about body image
- Taking and sending naked or sexually provocative images of self or others
- Single occurrence of peeping, exposing, mooning or obscene gestures
- Giving out contact details online
- Joining adult-only social networking sites and giving false personal information
- Arranging a face to face meeting with an online contact alone.

## Red Behaviours

### What is a red behaviour?

Red behaviours are outside of safe and healthy behaviour. They may be excessive, secretive, compulsive, coercive, degrading or threatening and involving significant age, developmental, or power differences. They may pose a concern due to the activity type, frequency, duration or the context in which they occur.

### What can you do?

Red behaviours indicate a need for immediate intervention and action.

### Red behaviours 0-5

- Persistently touching the genitals of other children
- Persistent attempts to touch the genitals of adults



- Simulation of sexual activity in play
- Sexual behaviour between young children involving penetration with objects
- Forcing other children to engage in sexual play.

### **Red behaviours 5-9**

- Frequent masturbation in front of others
- Sexual behaviour engaging significantly younger or less able children
- Forcing other children to take part in sexual activities
- Simulation of oral or penetrative sex
- Sourcing pornographic material online.

### **Red behaviours 9-13**

- Exposing genitals or masturbating in public
- Distributing naked or sexually provocative images of self or others
- Sexually explicit talk with younger children
- Sexual harassment
- Arranging to meet with an online acquaintance in secret
- Genital injury to self or others
- Forcing other children of same age, younger or less able to take part in sexual activities
- Sexual activity e.g. oral sex or intercourse
- Presence of sexually transmitted infection (STI)
- Evidence of pregnancy.

### **Red behaviours 13-17**

- Exposing genitals or masturbating in public
- Preoccupation with sex, which interferes with daily function
- Sexual degradation/humiliation of self or others
- Attempting/forcing others to expose genitals
- Sexually aggressive/exploitative behaviour
- Sexually explicit talk with younger children
- Sexual harassment
- Non-consensual sexual activity
- Use of/acceptance of power and control in sexual relationships
- Genital injury to self or others
- Sexual contact with others where there is a big difference in age or ability
- Sexual activity with someone in authority and in a position of trust
- Sexual activity with family members
- Involvement in sexual exploitation and/or trafficking
- Sexual contact with animals
- Receipt of gifts or money in exchange for sex.

*This is intended to be used as a guide only. Please refer to the guidance tool at <https://legacy.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> for further information*

*Brook sexual behaviours traffic light tool adapted from Family Planning Queensland. (2012). Traffic Lights guide to sexual behaviours. Brisbane: Family Planning Queensland, Australia.*

## **Anti-bullying/cyberbullying**

Each school's policy on anti-bullying is set out in a separate document and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

Each school will keep a record of known bullying incidents which is shared with, and analysed by the Governing Committee. All staff are aware that children with SEND and/or differences/perceived differences are more susceptible to being bullied or victims of child abuse.

When there is 'reasonable cause to suspect that a child is suffering from, or is likely to suffer significant harm', a bullying incident should be addressed as a child protection concern. If the anti-bullying procedures are seen to be ineffective, the Headteacher and the DSL will also consider child protection procedures.

PHSE education regularly provides opportunities for children to understand bullying is wrong, its impact and how to deal with it.

## **Online safety**

BET schools have an online safety policy which explains how we try to keep students safe in school and how online safety incidents are responded to.

Children routinely use electronic equipment on a daily basis to access the internet, share and view content and images via social media sites such as Facebook, Twitter, Instagram, Snapchat and for online gaming.

Some adults and other children use these technologies to harm children. The harm might range from sending hurtful or abusive texts or emails, to grooming and enticing children to engage in extremist or sexual behaviour such as webcam photography or face-to-face meetings.

Students may also be distressed or harmed by accessing inappropriate material such as pornographic websites or those which promote extremist behaviour, criminal activity, suicide or eating disorders.

Pupils are taught about online safety throughout the curriculum and all staff receive online safety training which is regularly updated. The school online safety co-ordinator is indicated at the start of this document.

## Racist incidents

Each school's policy on racist incidents is set out separately, and acknowledges that repeated racist incidents or a single serious incident may lead to consideration under child protection procedures. A record of racist incidents is kept.

## Radicalisation and extremism

**The Prevent Duty for England and Wales (2015) under section 26 of the Counter Terrorism and Security Act 2015** places a duty on education and other children's services to have due regard to the need to prevent people from being drawn into terrorism.

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'. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.

Some children are at risk of being radicalised; adopting beliefs and engaging in activities which are harmful, criminal or dangerous. This can happen both online and offline.

BET and its schools are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism should be followed.

BET and its schools seek to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to Islamist ideology, or to Far Right/ Neo Nazi/White Supremacist ideology, Irish Nationalist and Loyalist paramilitary groups, and extremist Animal Rights movements.

Staff receive training to help identify early signs of radicalisation and extremism.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice **Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)**.

The Trust, school governors, the Headteacher and the Designated Safeguarding Lead (DSL) will assess the level of risk within their schools and put actions in place to reduce that risk. Risk assessment may reference '**Due diligence checks: Use of onsite facilities by external visitors, private hire of school facilities and external speakers**', SCC January 2018, the Anti-Bullying Policy and other issues specific to the school's profile, community and philosophy.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow the safeguarding procedures and

refer cases to [preventreferrals@surrey.pnn.police.uk](mailto:preventreferrals@surrey.pnn.police.uk) following the Prevent referral process and use the Prevent referral form. For other local authorities see contact details in [appendix 4](#). If the matter is urgent then the police must be contacted by dialling 999. In non-urgent cases where police advice is sought then dial 101 and ask to speak to the Surrey/Hants/Metropolitan Police Prevent Co-ordinator.

The Department for Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around Prevent (020 7340 7264).

### **Indicators of vulnerability to radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.

Extremism is defined by the Crown Prosecution Service as:

- The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.

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

Pupils may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.

Indicators of vulnerability include:

- Identity crisis – the student is distanced from their cultural / religious heritage and experiences discomfort about their place in society;
- Personal crisis – the student may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging;
- Personal circumstances – migration; local community tensions; and events affecting the student’s country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of government policy;
- Unmet aspirations – the student may have perceptions of injustice or a feeling of failure;
- Experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration;

- Special Educational Needs and Disability – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- Being in contact with extremist recruiters;
- Accessing violent extremist websites, especially those with a social networking element;
- Possessing or accessing violent extremist literature;
- Using extremist narratives and a global ideology to explain personal disadvantage;
- Justifying the use of violence to solve societal issues;
- Joining or seeking to join extremist organisations;
- Significant changes to appearance and/or behaviour;
- Experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis.

The Department of Education guidance, The Prevent Duty can be accessed via the link in [Appendix 2](#).

## **Domestic abuse**

Domestic abuse represents one quarter of all violent crime. It is actual or threatened physical, emotional, psychological or sexual abuse. It involves the use of power and control by one person over another. It occurs regardless of race, ethnicity, gender, class, sexuality, age, religion, mental or physical ability. Domestic abuse can also involve other types of abuse.

The term domestic abuse is used to reflect that a number of abusive and controlling behaviours are involved beyond violence. Slapping, punching, kicking, bruising, rape, ridicule, constant criticism, threats, manipulation, sleep deprivation, social isolation, and other controlling behaviours all count as abuse.

Living in a home where domestic abuse takes place is harmful to children and can have a serious impact on their behaviour, well-being and understanding of healthy, positive relationships. Children who witness domestic abuse are at risk of significant harm and staff are alert to the signs and symptoms of a child suffering or witnessing domestic abuse.

BET schools are enrolled onto the Operation Encompass scheme, a joint project between police forces, local authorities, LA Domestic Abuse Services and schools, where every school day morning DSLs are notified of all domestic abuse incidents that have occurred and been reported to police in the previous 24 hours which involved a child at school (72 hours on a Monday morning). This provides an opportunity for schools to ensure the right support is in place at the right time for children who are experiencing domestic abuse.

## **Child sexual exploitation (CSE)**

Child sexual exploitation is a form of child sexual abuse.

This occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator.

The victim may have been sexually exploited even if the sexual activity appears consensual.

Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology. All staff are aware of the link between online safety and vulnerability to CSE.

Any concerns that a child is being or is at risk of being sexually exploited should be passed immediately to the DSL.

The Trust and its schools are aware there is a clear link between regular non-attendance at school and CSE. Staff will consider a child to be at potential CSE risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

The DSL at a school will consider the SSCP (or local SCP) guidance and advice when there is a concern that a child is being or is at risk of being sexually exploited or where indicators have been observed that are consistent with a child who is being or who is at risk of being sexually exploited.

In all cases, if the DSL identifies any level of concern, the DSL should contact the C-SPA or local equivalent and email a Request Support Form. If a child is in immediate danger the police should be called on 999.

Schools are aware that a child often is not able to recognise the coercive nature of the abuse and does not see themselves as a victim. As a consequence, the child may resent what they perceive as interference by staff. However, staff must act on their concerns as they would for any other type of abuse. Children also rarely self-report CSE so staff must be particularly vigilant to potential indicators of risk.

BET schools include the risks of sexual exploitation in the PHSE and SRE curriculum. Students will be informed of the grooming process and how to protect themselves from people who may potentially be intent on causing harm. They will be supported in terms of recognising and assessing risk in relation to CSE, including online, and knowing how and where to get help.

## **Child Criminal Exploitation & Gangs**

There are a number of areas in which young people are put at risk by gang activity, both through participation in, and as victims of, gang violence which can be in relation to their peers or to a gang-involved adult in their household.

A child who is affected by gang activity or serious youth violence may have suffered, or may be likely to suffer significant harm through physical, sexual and emotional abuse or neglect.

Teenagers can be particularly vulnerable to recruitment into gangs and involvement in gang violence. This vulnerability may be exacerbated by risk factors in an individual's background, including violence in the family, involvement of siblings in gangs, poor educational attainment, or poverty or mental health problems.

Criminal exploitation of children is a typical feature of county lines criminal activity. Key identifying features of involvement in county lines are when children are missing, when the victim may have been trafficked for transporting drugs, a referral to the National Referral Mechanism should be considered with Social Care and police colleagues.

A child who is affected by gang activity, criminal exploitation or serious youth violence can be at risk of significant harm through physical, sexual and emotional abuse. Girls may be particularly at risk of sexual exploitation.

Any concerns that a child is being or is at risk of being criminally exploited will be passed without delay to the DSL. Schools are aware there is a clear link between regular non-attendance at school and exploitation. Staff will consider a child to be at potential risk in the case of regular non-attendance at school and make reasonable enquiries with the child and parents to assess this risk.

A referral to the C-SPA or local equivalent will be made when any concern of harm to a child as a consequence of gang activity including child criminal exploitation becomes known. Any member of staff who has concerns that a child may be at risk of harm should immediately inform the DSL. The DSL will contact the C-SPA or local equivalent. If there is concern about a child's immediate safety, the police will be contacted on 999.

## **Youth produced sexual imagery (sexting)**

The practice of children sharing images and videos via text message, email, social media or mobile messaging apps has become commonplace. However, this online technology has also given children the opportunity to produce and distribute sexual imagery in the form of photos and videos. Such imagery involving anyone under the age of 18 is unlawful.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18.
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult.
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.

All incidents of this nature should be treated as a safeguarding concern and in line with the **UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'**.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to.

If a member of staff becomes aware of an incident involving youth produced sexual imagery they should follow the child protection procedures and refer to the DSL immediately.

The member of staff should confiscate the device involved and set it to flight mode or, if this is not possible, turn it off. Staff must not view, copy or print the youth produced sexual imagery.

The DSL should hold an initial review meeting with appropriate school staff and subsequent interviews with the children involved (if appropriate).

Parents should be informed at an early stage and involved in the process unless there is reason to believe that involving parents would put the child at risk of harm.

At any point in the process if there is concern a young person has been harmed or is at risk of harm a referral should be made to the C-SPA (or local equivalent) or the police as appropriate.

Immediate referral at the initial review stage should be made to children's Social Care/police if:

- The incident involves an adult
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs)
- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent
- The imagery involves sexual acts
- The imagery involves anyone aged 12 or under
- There is reason to believe a child is at immediate risk of harm owing to the sharing of the imagery, for example the child is presenting as suicidal or self-harming.

If none of the above apply then the DSL will use their professional judgement to assess the risk to pupils involved and may decide, with input from the Headteacher, to respond to the incident without referral to the C-SPA or the Police.

During the decision making the DSL will consider if:

- There is a significant age difference between the sender/receiver
- There is any coercion or encouragement beyond the sender/receiver
- The imagery was shared and received with the knowledge of the child in the imagery
- The child is vulnerable, for example subject to Child in Need, Child Protection or Early Help plans, Looked After, SEND



- There is a significant impact on the children involved
- The image is of a severe or extreme nature
- The child involved understands consent
- The situation is isolated or if the image been more widely distributed
- There other circumstances relating to either the sender or recipient that may add cause for concern. The children have been involved in incidents relating to youth produced imagery before.

If any of these circumstances are present the situation will be referred according to our child protection procedures, including referral to the C-SPA (or local equivalent) or the police.

The DSL will record all incidents of youth produced sexual imagery, including the actions taken, rationale for actions and the outcome.

### **Female genital mutilation (FGM)**

Female Genital Mutilation (FGM) is illegal in England and Wales under the **FGM Act (2003)**. It is a form of child abuse and violence against women. A mandatory reporting duty requires teachers to report 'known' cases of FGM in under 18s, which are identified in the course of their professional work, to the police.

The duty applies to all persons in school who are employed or engaged to carry out 'teaching work' in the school, whether or not they have qualified teacher status.

The duty applies to the individual who becomes aware of the case to make a report to the police. It should not be transferred to the Designated Safeguarding Lead, however the DSL should be informed.

If a teacher is informed by a girl under 18 that an act of FGM has been carried out on her or a teacher observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth, the teacher should personally make a report to the police force in which the girl resides by calling 101. The report should be made immediately.

School staff are trained to be aware of risk indicators of FGM. Concerns about FGM outside of the mandatory reporting duty should be reported using the school's safeguarding procedures. Staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer holiday.

There should also be consideration of potential risk to other girls in the family and practicing community. Where there is a risk to life or likelihood of serious immediate harm the teacher should report the case immediately to the police, including dialling 999 if appropriate.

There are no circumstances in which a teacher or other member of staff should examine a girl.

## Forced marriage

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

Forced marriage is recognised in the UK as a form of violence against women and men, domestic/child abuse and a serious abuse of human rights. Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the **Anti-Social Behaviour, Crime and Policing Act 2014**.

A forced marriage is not the same as an arranged marriage which is common in many cultures. The families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

School staff should never attempt to intervene directly as a school or through a third party. Contact should be made with the C-SPA or local equivalent and/or the **Forced Marriage Unit 0207 008 0151**.

## Honour-based violence

Honour based violence (HBV) can be described as a collection of practices, which are used to control behaviour within families or other social groups to protect perceived cultural and religious beliefs and/or honour. Such violence can occur when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code.

Honour based violence might be committed against people who:

- Become involved with a boyfriend or girlfriend from a different culture or religion;
- Want to get out of an arranged marriage; become involved with a boyfriend or girlfriend from a different culture or religion;
- Want to get out of an arranged marriage;
- Want to get out of a forced marriage;
- Wear clothes or take part in activities that might not be considered traditional within a particular culture

It is considered a violation of human rights and may be a form of domestic and/or sexual abuse.

## One chance rule

All staff are aware of the 'One chance rule' in relation to forced marriage, FGM and HBV. Staff recognise they may only have one chance to speak to a child who is a potential victim and have just one chance to save a life.

The school are aware that if the victim is not offered support following disclosure that the 'One Chance' opportunity may be lost. Therefore, all staff are aware of their responsibilities and obligations when they become aware of potential forced marriage, FGM and HBV cases.

## **Private fostering arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 years old or 18 years old if the child is disabled.

Children looked after by the local authority or who are placed in residential schools, children's homes or hospitals are not considered to be privately fostered.

Private fostering occurs in all cultures and children may be privately fostered at any age.

BET and its schools recognise that most privately fostered children remain safe and well but are aware that safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that the child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. However, where a member of staff becomes aware that a pupil may be in a private fostering arrangement they will raise this with the DSL and the DSL will notify the C-SPA or local equivalent.

## **Children Looked After**

The most common reason for children becoming looked after is as a result of abuse and neglect.

BET and its schools ensure that staff have the necessary skills and understanding to keep looked after children safe. Appropriate staff have information about a child's looked after legal status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child and contact arrangements with birth parents or those with parental responsibility.

The designated teacher and governor for children looked after within a school will have the appropriate level training to equip them with the knowledge and skills to undertake their role.

The designated teacher for children looked after and the DSL within a school will have details of the child's social worker and the name and contact details of the Surrey County Council's Head of Virtual School or local equivalent.

The designated teacher for children looked after and children previously looked after within a school will work in partnership with the Virtual School Assistant Headteacher to discuss how Pupil Premium

Plus funding can be best used to support the progress of children looked after in the school and meet the needs of each child within their personal education plan.

## Children missing education

All children, regardless of their circumstances, are entitled to an efficient, full time education which is suitable to their age, ability, aptitude and any special educational needs they may have.

BET and its schools recognise that children missing education are at significant risk of underachieving, being victims of abuse and harm, exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Where possible schools will hold more than one emergency contact number for each pupil.

Schools will ensure that there is a record of joiners and leavers as defined in **The Education (Pupil Registration) (England) 2006**.

When removing a child's name, schools will notify the Local Authority of: (a) the full name of the child, (b) the full name and address of any parent with whom the child normally resides, (c) at least one telephone number of the parent, (d) the child's future address and destination school, if applicable, and (e) the ground in regulation 8 under which the child's name is to be removed from the school register.

Schools will make reasonable enquiries to establish the whereabouts of a child jointly with the local authority, before deleting the child's name from the school register if the deletion is **under regulation 8(1), sub-paragraphs (f) (iii) and (h) (iii) of The Education (Pupil Registration) (England) 2006**.

BET schools will:

- Enter students on the admissions register on the first day on which the school has agreed, or has been notified, that the student will attend the school.
- Notify the local authority within five days of adding a child's name to the admission register. The notification must include all the details contained in the admission register for the new student.
- Monitor each child's attendance through their daily register and follow the SCC or equivalent local authority procedure in cases of unauthorised absence.
- Remove a child's name from the admissions register on the date that the child leaves the school.
- Notify the local authority when they are about to remove a child's name from the school register under any of the fifteen grounds listed in the regulations, no later than the date that the child's name is due to be removed.
- Where parents notify the school, in writing, of their intention to electively home educate the school will forward a copy of the letter to the Elective Home Education Team/Education Welfare. Where parents orally indicate that they intend to withdraw their child to be home

educated and no letter has been received, the school will not remove the child from roll and will notify Education Welfare at the earliest opportunity.

## **Pupils Missing Out on Education**

The vast majority of children engage positively with school and attend regularly. However, in order to flourish, some children require an alternative education offer or may require a modified timetable to support a return to full time education provision. It is recognised that children accessing alternative provision or a reduced or modified timetable may have additional vulnerabilities. Ofsted refer to these as Pupils Missing Out On Education (PMOOE), because they are not accessing their education in school in the 'usual way'.

BET schools will gain consent (if required in statute) from parents to put in place alternative provision and/or a reduced or modified timetable.

BET schools will ensure that and parents (and the local authority where the pupil has an EHCP) are given clear information about alternative provision placements and reduced or modified timetables: why, when, where, and how they will be reviewed.

BET schools will keep the placement and timetable under review and involve parents in the review. Reviews will be frequent enough to provide assurance that the off-site education and/or modified timetable is achieving its objectives and that the pupil is benefitting from it.

BET schools will monitor and track children attending alternative provision to ensure that the provision meets the needs of the child.

BET schools will comply with regular data returns requested by the Local Authority, regarding all pupils, of statutory school age, attending alternative provision and/or on a reduced or modified timetable.

BET schools' leadership will report to governors of any formal direction of a pupil to alternative provision to improve behaviour.

BET schools' leadership will report to governor's information regarding the use and effectiveness of the use of alternative provision and modified timetables.

## **School attendance and behaviour**

Additional policies and procedures are in place regarding school attendance and behaviour.

BET schools recognise that absence from school and exclusion from school may be indicators of abuse and neglect, including the exploitation of children. The DSL will regularly liaise with members of school

staff with responsibility for behaviour and attendance to ensure risk is identified and appropriate intervention is in place to protect children from harm.

BET schools will work in partnership with Surrey/local Police and other partners for reporting children that go missing from the school site during the school day. Staff will be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **Restrictive physical intervention**

It is acknowledged that staff must only ever use physical intervention as a last resort, when a child is or at immediate risk of harming him/herself or others, and that at all times it must be the minimal force necessary to prevent injury to another person. Such events should be fully recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained in “Positive Options” techniques.

Staff understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection and/or disciplinary procedures.

We recognise that touch is appropriate in the context of working with children, and all staff have been given ‘Safe Practice’ guidance to ensure they are clear about their professional boundaries.

When applying disciplinary measures such as physical intervention or isolation for children with SEND the school will consider the risks, given the additional vulnerabilities of these children.

Surrey County Council guidance ‘Touch and the use of restrictive Physical Intervention When Working with Children and Young People’ provides further detailed information.

## **Whistleblowing**

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.

All staff should be aware of their duty to raise concerns, where they exist, about the management of child protection, which may include the attitude or actions of colleagues, poor or unsafe practice and potential failures in the Trust’s or their school’s safeguarding arrangements. If it becomes necessary to consult outside the school, they should speak in the first instance, to the Area Schools Officer or LADO in accordance with the Whistleblowing Policy.

The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about a way a concern is being handled

by their school. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk).

Whistleblowing regarding the Headteacher should be made to the Chair of the Governing Committee whose contact details are available to staff.

## Appendix 1: Links with other school policies

(Individual schools may not have all these policies)

Administration of medicines  
 Allegations against staff  
 Anti-bullying  
 Behaviour Policy  
 Child Exploitation  
 Curriculum  
 Drugs Education  
 E-Safety, including staff use of mobile phones  
 Equality  
 Health & Safety  
 Intimate Care Parental Concerns/Complaints.  
 Physical Intervention  
 PSHE  
 Prevent - Radicalisation and Extremism  
 Recruitment and Selection  
 Risk Assessment  
 School Attendance  
 Sex and Relationships Education  
 Staff Behaviour Policy / Code of Conduct  
 Substance Misuse Policy  
 Teaching and Learning  
 Whistleblowing

## Appendix 2: Resources referenced in policy

<a href="#">Brook Traffic Light Tool</a>
<a href="#">Children Missing Education SCC</a>
<a href="#">Disqualification under the Childcare Act 2006</a>
<a href="#">Due diligence checks for external speakers and private hire of school facilities. SCC 2018</a>
<a href="#">Education Act 2002</a>
<a href="#">FGM Act 2003 Mandatory Reporting Guidance 2016</a>
<a href="#">Information Sharing Advice for Practitioners' guidance 2018</a>

<a href="#">Keeping Children Safe in Education 2019 (KCSIE)</a>
<a href="#">Promoting Fundamental British Values as part of SMSC in Schools (2014)</a>
<a href="#">School Attendance: Guidance for Schools DfE 2013</a>
<a href="#">Searching, screening and confiscation at school DfE 2018</a>
<a href="#">Sexting in schools and colleges</a>
<a href="#">Sexual Violence and Sexual Harassment between Children in Schools and Colleges DfE May 2018</a>
<a href="#">Surrey Neglect Risk Assessment tool and guidance</a>
<a href="#">Surrey Safeguarding Children Partnership</a>
<a href="#">Surrey Safeguarding Children Partnership Levels of Need</a>
<a href="#">Teacher Standards 2013</a>
<a href="#">The Equality Act 2010</a>
<a href="#">The Prevent Duty for England and Wales (2015)</a>
<a href="#">Touch and the use of physical intervention when working with children and young people SCC 2019</a>
<a href="#">What to do if you are worried a child is being abused (2015)</a>
<a href="#">Working Together to Safeguard Children (2018)</a>

### **Appendix 3: Further safeguarding resources**

NSPCC: <https://www.nspcc.org.uk/>

ChildLine: <http://www.childline.org.uk/pages/home.aspx>

CEOP Thinkuknow: <https://www.thinkuknow.co.uk/>

Anti-Bullying Alliance: <http://anti-bullyingalliance.org.uk/>

Childnet International <http://www.childnet.com/>

Safer Internet Centre <http://www.saferinternet.org.uk/>

Contextual Safeguarding Network <https://www.contextualsafeguarding.org.uk/>



## Appendix 4: Contact details

Agency	Contact Details	Notes
<b>Surrey</b>		
Surrey Children's Single Point of Access (C-SPA)	0300 470 9100 <a href="mailto:csmash@surreycc.gov.uk">csmash@surreycc.gov.uk</a>	09.00 to 17.00 Mon to Fri
	01483 517898 <a href="mailto:Edt.ssd@surreycc.gov.uk">Edt.ssd@surreycc.gov.uk</a>	All other times
Surrey LADO (Local Authority Designated Officer)	0300 123 1650 (Option 3) <a href="mailto:LADO@surreycc.gov.uk">LADO@surreycc.gov.uk</a>	09.00 to 17.00 Mon to Fri
Surrey Safeguarding Children Partnership (SSCP)	<a href="https://www.surreyscp.org.uk/">https://www.surreyscp.org.uk/</a>	
Prevent referral	<a href="#">Link to referral form</a>	<a href="#">Refer by email</a>
<b>Hampshire</b>		
Hampshire Children's Services	0300 555 1384	08.30 – 17.00 Mon to Fri
	0300 555 1373	All other times
	01329 225379	Children's Services Professionals line
	<a href="mailto:csprofessionals@hants.gov.uk">csprofessionals@hants.gov.uk</a>	Referrals by email
	<a href="#">Link to Hants Children's Services</a>	Website with further information
	<a href="#">Link to Inter Agency Referral form (IARF)</a>	
Prevent referral	0300 555 1384	Children
	0300 555 1386	Adults
	<a href="#">Prevent referral process in Hampshire</a>	
<b>Richmond</b>		
Richmond Single Point of Access (SPA)	42, York Street, Twickenham, TW1 3BW	
	0208 547 5008	08.00 – 18.00 Mon to Fri
	0208 770 5000	All other times
Prevent referral	Richmond MASH 0208 547 5008	
Richmond LADO	<a href="mailto:lado@richmond.gov.uk.cjism.net">lado@richmond.gov.uk.cjism.net</a> 0208 547 5008 (08.00 to 18.00 M to F) 0208 770 5000 (all other times)	
Kingston and Richmond Safeguarding Children Partnership	<a href="#">Link to SCP site</a>	

## Appendix 5 - Safeguarding Policy: COVID-19 addendum

<b>Approved by:</b>	Tony Oakden (LGC)	<b>Date:</b> April 2020
<b>Last reviewed on:</b>	April 2020	
<b>Next review due by:</b>	April 2021	

### Important contacts

ROLE	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Alison Reid	a.reid@jubileehigh.surrey.sch.uk
Deputy DSL	Louisa Merrall	l.merrall@jubileehigh.surrey.sch.uk
Bourne Education Trust DSL	Gayle Jenkins	jenkinsg@bourne.education
Headteacher	Mark Conroy	m.conroy@jubileehigh.surrey.sch.uk
Local authority designated officer (LADO)	Kate Prince	kate.prince@surreycc.gov.uk
Chair of governors	Tony Oakden	clerk@jubileehigh.surrey.sch.uk

### 1. Scope and definitions

This addendum applies during the period of school closure due to COVID-19, and reflects updated advice from our 3 local safeguarding partners the Local Authority (LA), The Clinical Commissioning Group and the Chief Officer of Police. The local authority for this school is Surrey.

It sets out changes to our normal safeguarding policy in light of the Department for Education's guidance [Coronavirus: safeguarding in schools, colleges and other providers](#), and should be read in conjunction with that policy.

Unless covered here, our normal safeguarding policy continues to apply.

DfE guidance published 1<sup>st</sup> April 2020 classifies 'vulnerable' children as those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans. Those who have a social worker include children who have a child protection plan and those who are looked after by the local authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989

### 2. Core safeguarding principles

We will still have regard to the statutory safeguarding guidance, Keeping Children Safe in Education (2019).

Although we are operating in a different way from normal, we are still following these important safeguarding principles:

- The best interests of children must come first
- If anyone has a safeguarding concern about any child, they should continue to act on it immediately
- A designated safeguarding lead (DSL) or deputy should be available at all times (see section 4 for details of our arrangements)
- It's essential that unsuitable people don't enter the school workforce or gain access to children
- Children should continue to be protected when they are online

### **3. Reporting concerns**

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this.

In all cases, whether working from home or in school, you must report any concerns immediately to your DSL, DDSL or the Trust DSL. If you have access you must also record the incident as quickly as possible on CPOMS.

As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

### **4. DSL (and deputy) arrangements**

We aim to have a trained DSL or deputy DSL on site wherever possible. Details of all-important contacts are listed in the 'Important contacts' section at the start of this addendum.

If our DSL (or deputy) can't be in school, they can be contacted remotely by: 07886229094

If our DSL (or deputy) is unavailable, Gayle Jenkins is acting as Trust DSL and can be contacted via email at [jenkinsg@bourne.education](mailto:jenkinsg@bourne.education).

We will keep all school staff and volunteers informed by email or verbal communication as to who will be the DSL (or deputy) on any given day, and how to contact them.

We will ensure that DSLs (and deputies), wherever their location, know who the most vulnerable children in our school are.

On occasions where there is no DSL or deputy DSL on site, a senior leader will take responsibility for co-ordinating safeguarding. This will usually be the Headteacher but another member of SLT will be designated and made known to staff in his/her absence by email or verbal communication. This senior leader will be referred to as the Designated Senior Person (DSP)

The DSP will be responsible for liaising with the off-site DSL (or deputy) to make sure they (the senior leader) can:

- Identify the most vulnerable children in school
- Update and manage access to child protection files, where necessary

- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessment.

## 5. Working with other agencies

We will continue to work with children's social care, and with virtual school heads for looked-after and previously looked-after children.

We will continue to update this addendum where necessary, to reflect any updated guidance from:

- Our 3 local safeguarding partners
- The local authority about children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need.

## 6. Monitoring attendance

### **Expectations of an Education Setting to track, identify and action non-attendance of vulnerable children and Automated Tracking Mechanism**

We know that some families need more support than others and that attending education settings is an important protective factor for children receiving support. We also know that some families may over-estimate their ability to cope in these extraordinary times.

All professionals need to be mindful that there will be some examples where the current Covid-19 pandemic could be used by families as a reason to avoid contact from professionals when the family may not be symptomatic and to prevent identification of safeguarding issues.

To ensure that appropriate action is taken to keep children safe and protected we require all education settings to identify through a new automated tracking mechanism the non-attendance of **vulnerable children that are expected to attend an education setting**.

**Education settings must act by notifying the local authority on the first day of non-attendance and any day following, when a vulnerable child, that is expected to attend an education setting is absent, by using the following link to the Automated Tracking Mechanism:**

<https://www4.surreycc.gov.uk/social/child/absence-submission-portal/>

Education settings must continue to take action as soon as they are aware of non-attendance using first day calling and other internal tracking and follow up procedures. Education settings must continue to inform relevant agencies (including Social Work Teams) and professionals of any concerns that require a response.

### **Expectations of the Social Work Team response to non-attendance**

The Automated Tracking Mechanism, described above, immediately alerts the Social Work Team to act in response to the child's non-attendance at the education setting. Surrey Virtual School will be informed if the child is looked after.

On receipt of an alert the social work team must act to contact the family to find out why the child hasn't attended and act to encourage them to attend if it's safe to do so.

The social work team must act to contact the education setting to further inform their assessment of the risk to the child of non-attendance.

If a child is not presenting at an education setting because they are symptomatic or self-isolating it is essential that the social worker contact the education setting and any relevant partner (including Surrey Virtual School), to action arrangements for maintaining contact with the child and agree who will contact the child and how.

It may be necessary for a Social Worker to take action by visiting the child in person to establish their wellbeing

Keeping in touch with the child and the family during any isolation period is the responsibility of the team around that child. A clear plan for visiting (virtual or in person) must be made and acted upon by all partners. The team around the child partners must communicate to the Social Worker findings from each visit they undertake.

Due to the number of notifications it is not possible for social care to guarantee a response time, each response time will be based on the Social Work Team's analysis of risk.

If an education setting has significant concerns about a child's safety or wellbeing the education setting should ring the child's Social Worker for an urgent discussion. If the child's social worker is not available a discussion should be held with the Social Work Team Manager. If neither are available contact must be made with the Social Work Service Manager. If you are not satisfied with the response you get from the Social Work Team education settings must follow the [SSCP Inter-Agency Escalation Policy and Procedures](#).

### **Expectations of a SEND/Vulnerable Learner Team response to non-attendance**

Where a child with an EHCP has a Social Worker, the process above will be followed by the Social Work Team.

The Automated Tracking Mechanism, described above, will collate data for EHCP children to be sent to the Vulnerable Learners Service once a week for action.

Attendance and any known history of the child will be considered by the appropriate professionals within the Vulnerable Learners Service to establish further action.

The Vulnerable Learners Service will establish with the family the reasons why the child has not attended and act to encourage them to attend if it's safe to do so.

If a child is not presenting at an education setting because they are symptomatic or self-isolating it is essential that the Vulnerable Learner Service contact the education setting to inform them of this and act to establish the ongoing point of contact while the child is not attending the education setting.

Where circumstances change the education setting should act to ensure any changes to risk are notified to the Local Authority in a timely manner (within 24 hours of being informed of the change) via the SEND Team area email address.

### **Children and young people who are "otherwise vulnerable" expectations on the education partnership**

This cohort is defined as children and young people who have been assessed as “otherwise vulnerable” by education settings, the local authority or partner agencies; examples may include Young Carers, adopted children and/or children with mental health and wellbeing concerns.

The Vulnerable Learners Service will contact education settings to assist the identification of these children and young people.

Education settings should use their discretion to encourage the attendance of children and young people that they or partners feel would be safer by attending provision. In the case of non-attendance education settings should act to follow up with both the parent/carer and any partner agency involved to establish the reason for absence and act to encourage attendance.

The Vulnerable Learners Service will provide support to education settings to identify “otherwise vulnerable children” who do not have a Social Worker or an EHCP. The Vulnerable Learners Service will assist the setting to make arrangements with families to provide for these children and track and encourage attendance.

**Where any professional continues to have concerns about the safety of a child they should email a Children’s Services Request for Support Form to [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk) or contact the C-SPA on 0300 470 9100.**

## **7. Peer-on-peer abuse**

We will continue to follow the principles set out in part 5 of Keeping Children Safe in Education when managing reports and supporting victims of peer-on-peer abuse.

Staff should continue to act on any concerns they have immediately. If guidance is needed about dealing with concerns and carrying out investigations you should immediately seek the advice of the DSL, DDSL, Trust DSL or DSP.

## **8. Concerns about a staff member or volunteer**

We will continue to follow the principles set out in part 4 of Keeping Children Safe in Education.

Staff should continue to act on any concerns they have immediately by following the process set out in the main body of this policy.

In dealing with allegations or concerns against an adult, staff must:

- Report any concerns about the conduct of any member of staff or volunteer to the Headteacher immediately. If the Headteacher is not available the matter should be immediately referred to the Designated Senior Person or the Trust DSL, Gayle Jenkins (contact information is listed at the beginning of this appendix).
- If an allegation is made against the Headteacher, the concerns need to be raised with the Chair of Governors as soon as possible. If the Chair of Governors is not available, then the Trust DSL or the LADO should be contacted directly – [see Appendix 4 for contact details](#).

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk) for the duration of the COVID-19 period, in line with government guidance.

## **9. Supporting children in school**

We are committed to ensuring the safety and wellbeing of all our pupils.

We will continue to be a safe space for all children to attend and flourish. The Headteacher will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety.

We will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19.

We will ensure that where we care for children of critical workers and vulnerable children on site, we ensure appropriate support is in place for them.

## **10. Support for children who aren't 'vulnerable' but where we have concerns**

We have the option to offer places in school to children who don't meet the Department for Education's definition of 'vulnerable', but who we have safeguarding concerns about. We will work with parents/carers to do this.

If these children will not be attending school, we will put a contact plan in place, as explained in section 11.1 below.

## **11. Safeguarding for children not attending school**

### **11.1 Contact plans**

We have contact plans for children with a social worker and children who we have safeguarding concerns about, for circumstances where:

- They won't be attending school (for example where the school, parent/carer and social worker, if relevant, have decided together that this wouldn't be in the child's best interests); or
- They would usually attend but have to self-isolate

These plans set out:

- How often the school will make contact
- Which staff member(s) will make contact
- How they will make contact

We have agreed these plans with children's social care where relevant, and will review them on an ongoing basis relevant to each child but will ensure there is a weekly 'check-in' with the student and family.

If we can't make contact, we will make immediate contact with the child's social care worker or if needed the police.

## 11.2 Safeguarding all children

Staff and volunteers are aware that this difficult time potentially puts all children at greater risk.

Staff and volunteers will continue to be alert to any signs of abuse, or effects on pupils' mental health that are also safeguarding concerns, and act on concerns immediately. In particular, children are likely to be spending more time online (see section 12 below).

## 12. Online safety

### 12.1 In school

We will continue to have appropriate filtering and monitoring systems in place in school.

The Bourne Education Trust Staff Code of Conduct and Staff Information Communication Technology policies have both been amended to reflect the current situation and revised copies have been made available to all staff.

### 12.2 Outside school

Where staff are interacting with children online, they will continue to follow our revised Staff Code of Conduct and Staff Information Communication Technology policies.

Safeguarding element of these policies will apply equally to any online and distance learning arrangements and include but are not limited to:

- Acceptable use of technologies
- Staff/pupil relationships and communication, including use of social media

Staff must continue to be alert to signs that a child may be at risk of harm online, and act on any concerns immediately, following our reporting procedures as set out in section 3 of this addendum.

We will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

We will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where webcams are involved:

- Realtime videoconferencing or live lesson delivery is **not** recommended and is covered in more detail in the Staff ICT policy.
- If, however, live class delivery has been agreed with the Headteacher, lessons should be recorded so that if any issues were to arise, the video can be reviewed.
- Language must be professional and appropriate, including any family members in the background.



- Staff must ensure they deliver live or recorded lessons from a suitable environment, ideally with the background blurred
- Staff must only use platforms provided by or agreed by the Trust to communicate with pupils.

### **12.3 Working with parents and carers**

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online
- Know what our school is asking children to do online, including what sites they will be using and who they will be interacting with from our school
- Are aware that they should only use reputable online companies or tutors if they wish to supplement the remote teaching and resources our school provides
- Know where else they can go for support to keep their children safe online

Support for parents and carers to keep their children safe online includes access information to the following online sites:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and careers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

## **13. Mental health**

Where possible, we will continue to offer our current support for pupil mental health for all pupils. This will be through our East to West link worker, who will be in weekly contact with their key students.

We will also signpost all pupils, parents and staff to other resources to support good mental health at this time.

When setting expectations for pupils learning remotely and not attending school, teachers will bear in mind the potential impact of the current situation on both children's and adults' mental health.

## **14. Staff recruitment, training and induction**

### **14.1 Recruiting new staff and volunteers**

We continue to recognise the importance of robust safer recruitment procedures, so that adults and volunteers who work in our school are safe to work with children.

We will continue to follow our safer recruitment procedures, and part 3 of Keeping Children Safe in Education.

In urgent cases, when validating proof of identity documents to apply for a DBS check, we will initially accept verification of scanned documents via online video link, rather than being in physical possession of the original documents. This approach is in line with revised guidance from the DBS.

New staff must still present the original documents when they first attend work at our school.

We will continue to do our usual checks on new volunteers, and do risk assessments to decide whether volunteers who are not in regulated activity should have an enhanced DBS check, in accordance with paragraphs 167-172 of Keeping Children Safe in Education.

#### **14.2 Staff 'on loan' from other schools**

We will assess the risks of staff 'on loan' working in our school, and seek assurance from the 'loaning' school that staff have had the appropriate checks. These risk assessments will be coordinated by the School Business Manager and will be signed off by the Headteacher.

We will also use the DBS Update Service, where these staff have signed up to it, to check for any new information.

#### **14.3 Safeguarding induction and training**

We will make sure staff and volunteers are aware of changes to our procedures and local arrangements.

For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

All existing school staff have had safeguarding training and have read part 1 of Keeping Children Safe in Education (2019). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

New staff and volunteers will continue to receive:

- A safeguarding induction
- A copy of our children protection policy (including this addendum)
- Keeping Children Safe in Education part 1

We will decide on a case-by-case basis what level of safeguarding induction staff 'on loan' need. In most cases, this will be:

- A copy of our safeguarding policy and this addendum
- Confirmation of local processes
- Confirmation of DSL arrangements

#### **14.4 Keeping records of who is on site**

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, we will continue to keep the single central record (SCR) up to date as outlined in paragraphs 148 to 156 in KCSIE. The SCR can also, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

#### **15. Children attending other settings**

Where children are temporarily required to attend another setting, we will make sure the receiving school is provided with any relevant welfare and child protection information.

Wherever possible, our DSL (or deputy) and/or special educational needs co-ordinator (SENCO) will securely share, as applicable:

- The reason(s) why the child is considered vulnerable and any arrangements in place to support them
- The child's EHC plan, child in need plan, child protection plan or personal education plan
- Details of the child's social worker
- Details of the virtual school head
- Details of any medical needs and medication
- Contact details of parent(s)/carer(s)

Where the DSL, deputy or SENCO can't share this information, the senior leader(s) identified in section 4 will do this.

We will share this information securely before the child arrives as far as is possible, and otherwise as soon as possible afterwards.

#### **16. Monitoring arrangements**

This policy will be reviewed as guidance from the 3 local safeguarding partners, the LA or DfE is updated, and as a minimum every 8 weeks. At every review, it will be approved by the Headteacher and a member of the Trust Executive team.

#### **17. Links with other policies**

This policy links to the following policies and procedures:

- Staff Code of Conduct
- Staff Information, Communication and Technology policy
- Data Protection policy
- Equal Opportunities and Inclusion policy
- E-safety policy

- Whistle-blowing policy