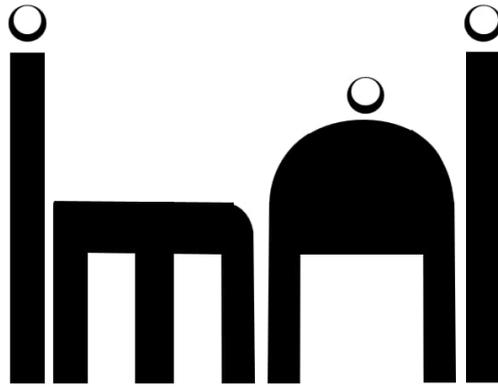


مَعْهَدُ الْإِمَامِ مُحَمَّدٍ آدَمَ الْإِسْلَامِيِّ

Ma'had Al-Imām Muhammad Adam Al-Islāmi

A Tradition of Excellence

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THE IMAM MUHAMMAD ADAM INSTITUTE

# Safeguarding and child protection policy

August 2023

Review date: August 2024

|                                             |                                                                                                                   |                                                               |
|---------------------------------------------|-------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|
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### **1. Introduction**

1.1 The school fully recognises the contribution it can make to protect children and support pupils in school. The aim of this policy is to safeguard and promote our pupils welfare, safety and health by fostering an honest, open, caring and supportive climate. The pupils' welfare is of paramount importance. This policy sets out how The School and the principal discharges its statutory responsibilities relating to safeguarding and promoting the welfare of children who are pupils at The School.

Safeguarding is defined as:

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

1.2 The school is committed to safeguarding and promoting the welfare of all its students.

We believe that:

- All children/young people have the right to be protected from harm;
- Children/young people need to be safe and to feel safe in school;
- Children/young people need support which matches their individual needs, including those who may have experienced abuse;
- All children/young people have the right to speak freely and voice their values and beliefs;
- All children/young people must be encouraged to respect each other's values and support each other;
- All children/young people have the right to be supported to meet their emotional, and social needs as well as their educational needs – a happy healthy sociable child/young person will achieve better educationally;
- Schools can and do contribute to the prevention of abuse, victimisation, bullying, exploitation, extreme behaviours, discriminatory views and risk taking behaviours; and
- All staff and visitors have an important role to play in safeguarding children and protecting them from abuse. 'Staff' covers all adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

1.3 The Principal who is also the Proprietor takes seriously his responsibility under section 175 of the Education Act 2002 to safeguard and promote the welfare of children; and to work together with other agencies to ensure adequate arrangements within our school to identify, assess, and support those children who are suffering harm.

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- 1.4 We recognise that all staff have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern.
- 1.5 All staff believe that our school should provide a caring, positive, safe and stimulating environment that promotes the social, physical and moral development of the individual child.

## **2. Aims**

- 2.1 This policy will contribute to safeguarding our students and promoting their welfare by supporting the child's development in ways that will foster security, confidence and resilience.
  - Providing an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
  - Raising the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
  - Providing a systematic means of monitoring children known or thought to be at risk of harm, and ensure we, The School, contribute to assessments of need and support plans for those children including children who are absent from education for prolonged periods and/or repeated occasions.
  - Acknowledging the need for effective and appropriate communication between all members of staff in relation to safeguarding pupils.
  - Developing a structured procedure within The School which will be followed by all members of The School community in cases of suspected abuse.
  - Developing effective working relationships with all other agencies involved in safeguarding children. Including appropriate work within the curriculum.
  - Ensuring that all adults within our school who have access to children have been checked as to their suitability.

## **3. Multi agency working**

The Leicester Safeguarding Children Partnership Board was established to oversee the new Multi-Agency Safeguarding Children arrangements as required by the government guidance Working Together 2018. These arrangements replaced the Local Safeguarding Children Board in September 2019.

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Our school procedures for safeguarding children are in line with the Leicester City Safeguarding Children's Partnership Board (LSCPB), Multi Agency Child Protection/Safeguarding Procedures; <http://llrscb.proceduresonline.com/chapters/contents.html>), in addition to the statutory requirements as outlined in 1.3.

We work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

## **4. Expectations**

### **4.1 All staff and visitors will be familiar with this safeguarding policy;**

- Staff will have access to a copy of, and be well versed in our Safeguarding and Child Protection Policy; which will also form part of their induction and revisited through the annual safeguarding training. Safeguarding updates will be communicated to staff as required
- Be subject to safer recruitment processes and checks, whether they are new staff, supply staff, contractors, volunteers etc;
- The School has a visitor guide in main reception notifying external visitors who the members of the Designated safeguarding team are and what to do if they have any concerns about a child's welfare.
- Be involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans;
- Be alert to signs and indicators of possible abuse (See Appendix 1)
- Record concerns/disclosures and give the record to the DSL; and
- Deal with a disclosure of abuse from a child in line with our school procedures; informing the DSL immediately, and provide a written account as soon as possible. This includes making the appropriate contact with children's social care.
- Ensure victims are taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment
- All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Information should be kept confidential and stored securely.
- Records should include:
  - a clear and comprehensive summary of the concern;
  - details of how the concern was followed up and resolved;
  - a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the designated safeguarding lead (or deputy).

### **4.2 All parents will be familiar with this safeguarding policy;**

Parents/Cares will have access to this Policy as part of initial information given to perspective/existing Parents/Carers and will be available through our school's website. Additional copies will be issued as and when required including notifying parents of changes within the document i.e. revised annual policy.

### **4.3 Communicating with parents**

In addition to section 4.2 above, the following statement is provided and highlighted to parents so they are aware of The School's responsibilities:

'The School ensures children learn in a safe, caring and enriching environment. Children are taught how to keep themselves safe, to develop positive and healthy relationships, how to avoid situations where they might be at risk including by being exploited.

The School has a statutory responsibility to share any concerns it might have about a child in need of protection with other agencies and in particular police, health and children's services. Schools are not able to investigate concerns but have a legal duty to refer them. In most instances, The School will be able to inform the parents/carer of its need to make a referral. However, sometimes The School is advised by Children's Social Care or police that the parent/carer cannot be informed whilst they investigate the matter. We understand the anxiety parents/carers understandably feel when they are not told about any concerns from the outset. The School follows legislation that aims to act in the BEST interests of the child.

## **5. Extended school and before and after school activities and the use of school premises for non-school activities**

- 5.1 Where the principal provides services or activities directly under the supervision or management of school staff, The School's arrangements for child protection will apply.
- 5.2 Where services or activities are provided separately by another body, the principal should seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with The School on these matters where appropriate
- 5.3 Where schools is for non-school activities, the school will expect providers (hirers) to have in place safeguarding arrangements in accordance with the guidance on keeping children safe in out-of-school settings. Further information can be found in paragraph 167 of the updated guidance (<https://www.gov.uk/government/publications/keeping-children-safe-in-out-of-school-settings-code-of-practice/keeping-children-safe-during->

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[community-activities-after-school-clubs-and-tuition-non-statutory-guidance-for-providers-running-out-of-school-settings#basic-safeguarding-checklist-of-requirements-for-all-providers](#) )

- 5.4 Where the school is used for non-school activities, as with any safeguarding allegation, the school will follow safeguarding policies and procedures, including informing the LADO should they receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children. Examples of these include community groups, sports associations or service providers that run extra-curricular activities)

## **6. Responsibilities**

- 6.1 We understand that our responsibility to safeguard children requires that we all appropriately share any concerns as soon as a staff member or volunteer suspects/knows of a concern that we may have about children. The first point of contact is the DSL and in their absence, one of the Deputy Safeguarding Leads. The Deputy DSLs will inform the DSL of any referrals to be made/which have been made. If any staff member is involved, the report is made to the principal who is also the proprietor
- 6.2 Concerns about the proprietor who is the principal of The School will be taken directly to the Local Authority Designated Officer (LADO)**
- 6.3 The Principal will ensure that:**
- The School has a child protection policy and procedures in place, and the policy is made available to parents on request and available on The School website ((<http://www.imai.org.uk/policies/>))
  - There is a senior member of The School's leadership team who is designated to take lead responsibility for dealing with child protection – DSL.
  - There is an appointed deputy(s) for child protection, in the event of the unavailability of the DSL
  - The DSL and the appointed deputy(s) for child protection undertakes training for designated senior persons, in addition to inter-agency child protection training, that is provided by, or to standards agreed by, LSCPB, and attends refresher DSL training at two-yearly intervals.
  - The Principal, and all other staff and volunteers who work with children, undertake appropriate training which is kept up-to-date through annual training including those in relation to filtering and monitoring systems and that new staff, temporary staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities through the induction process.

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- they receive safeguarding training which includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring
- There are procedures for dealing with allegations of abuse against members of staff and volunteers (see appendices)
- The principal deals with any allegations of abuse made against the Designated Safeguarding Lead and all other members of staff, in liaison with the Local Authority Designated Officer. (see appendices)
- The principal will have a role in dealing with individual cases or a right to details of cases except when exercising their disciplinary functions in respect of allegations against a member of staff.
- Any deficiencies or weaknesses brought to the attention of the principal are rectified.
- Policies and procedures are reviewed annually, and information is provided to the Local Authority on how the school discharges its duties regarding safeguarding and child protection.
- The Principal will champion issues to do with safeguarding children and child protection within The School, liaise with the DSL and that person is appropriate trained to discharge their responsibilities effectively.
- Will ensure that school creates a culture of safe recruitment and, as part of that, adopts recruitment procedures that help deter, reject or identify people who might abuse children
  - Will ensure that principal has attend Safer Recruitment Training, and that training is refreshed no later than every 2 years.
  - Will ensure pupils are taught safeguarding, including online through teaching and learning opportunities, as part of providing a broad and balanced curriculum.

6.4 **The designated safeguarding lead** will take lead responsibility for safeguarding and child protection including online safety and understanding the filtering and monitoring systems and processes in place.

The designated safeguarding lead will have the appropriate status and authority within the school to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and will be given the additional time, funding, training, resources and support they need to carry out the role effectively.

Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### **Deputy designated safeguarding leads**

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Any deputies will be trained to the same standard as the designated safeguarding lead. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **Availability**

During term time the designated safeguarding lead (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or a deputy) would be expected to be available in person, in exceptional circumstances availability via phone or other such media may be acceptable.

### **Manage referrals**

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required, and
- where a crime may have been committed to the Police as required.

### **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance - PACE Code C 2019.
- as required, liaise with the "case manager" (as per KCSIE Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior mental health leads and the named staff with oversight for SEND and senior mental health leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances

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- work with the principal and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school. This includes:
  - ensuring that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort, and
  - supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

### **Information sharing and managing the child protection file**

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

They will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of KCSIE 2023.

Where children leave the school (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

The designated safeguarding leads and the named person with oversight for SEND, will be aware as required of child protection files received by the school.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow

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the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

### **Raising awareness**

The designated safeguarding lead will:

- ensure each member of staff has access to, and understands, the school's child protection policy and procedures, especially new and part-time staff
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with the proprietor regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school leadership staff.

### **Training, knowledge and skills**

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead (and any deputies) will also undertake Prevent awareness training.

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers

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- understand the importance of information sharing, both within the school and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required
- to keep children safe whilst they are online at school
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

### **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

### **Understanding the views of children**

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

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### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of KCSIE 2023, and therefore the designated safeguarding lead will be equipped to:

- understand the importance of information sharing, both within the school and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping

6.5 All staff will be versed in our Whistleblowing Procedure and understand when it is appropriate to use the procedures.

6.6 If a staff member feels they cannot disclose information to their DSL or principal, they must then follow our school's whistleblowing procedures to report their concerns (see appendices).

## **7. Safer recruitment**

7.1 The school will ensure that the school pays full regard to DfE guidance 'Keeping Children Safe in Education 2023'

We ensure that all appropriate measures are applied in relation to everyone who works in The School who is likely to be perceived by the children as a safe and trustworthy adult. Safer recruitment practice includes scrutinising applicants, verifying identity, academic and vocational qualifications, obtaining references, checking previous employment history and ensuring that a candidate has the health and physical capacity for the job. It also includes undertaking interviews and checking the candidates DBS status, the Barred List and right to work in England checks.

In line with statutory changes, underpinned by regulations, The School will maintain a Single Central Record (SCR). The information that must be recorded in respect of all staff members mentioned above is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained apply:

- an identity check;
- a barred list check;
- an enhanced Disclosure and Barring Service (DBS) check
- a prohibition from teaching check;

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- a section 128 check (for management positions as set out in KSCIE 2023 for independent schools)
- further checks on people who have lived or worked outside the UK.
- a check of professional qualifications; and
- a check to establish the person's right to work in the United Kingdom.

Online searches may be conducted as part of the School's due diligence during the recruitment process and which may help identify any incidents or issues that have happened, and are publicly available online, which the school may want to explore with the applicant at the interview.

A curriculum vitae (CV) will only be accepted alongside a full application form. CVs on their own will not contain all the information required to support safer recruitment and thus not accepted on their own.

For supply staff, The School will include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff and the date that confirmation was received. The supply staff must provide photographic ID upon arrival at The School.

Where checks are carried out on volunteers

, The School will record this on the single central record. Under no circumstances will a volunteer in respect of whom no checks have been obtained be left unsupervised. A risk assessment will be undertaken to ensure all volunteers are suitable to work with children and whether they require a DBS check or not.

Copies of documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file

- 7.2 The principal understands and fulfils their safeguarding responsibilities.
- 7.3 We have Designated Safeguarding Leads (DSL) and a Deputy Designated Safeguarding Leads (DDSL) for child protection and safeguarding, who have undertaken DSL training delivered by National College; of which their training will be refreshed every two years.
- 7.4 All members of staff are provided with opportunities annually to receive inset training by the DSL and DDSL in order to develop their understanding of child protection and safeguarding in particular the signs and indicators of abuse.

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- 7.5 All members of staff, volunteers, principal and members of the Senior Leadership Team know how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse.
- 7.6 All parents/carers are made aware of The School's responsibilities in regard to child protection procedures through publication of The School's Safeguarding and Child Protection Policy.
- 7.7 Our safer-recruitment policy will seek to ensure the suitability of adults working with children on school sites at any time. A minimum of two individuals have completed Safer Recruitment Training.
- 7.8 The name of any member of staff considered not suitable to work with children will be notified to either the Disclosure and Barring Service or the relevant Government Department/Agency (where appropriate), depending on the nature of the concern, with the advice and support of the Local Authority Designated Officer. (LADO). Our procedures will be annually reviewed and up-dated.
- 7.9 The name of the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead will be clearly shown in The School, with a statement explaining The School's role in referring and monitoring cases of suspected abuse.
- 7.10 All adults, (including supply teachers, non-teaching staff and volunteers), new to our school will be given or directed to a copy of the Child Protection and Safeguarding Policy, Staff Code of Conduct, the booklet 'What To Do if You're Worried A Child is Being Abused'3, Keeping Children Safe in Education Part 1, and the name and contact details of the Designated Safeguarding Lead will be explained as part of their induction into The School. In addition to this, all such staff and volunteers will be made aware of the 'Guidance for safer working practice for those working with children and young people in education settings, 2019 (Safer Recruitment Consortium)

## **8. Supporting children**

- 8.1 We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth
- 8.2 We recognise that The School may provide the only stability in the lives of children who have been abused or who are at risk of harm
- 8.3 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 being withdrawn
- 8.4 Our school will support all students by:
- Encouraging the development of self-esteem and resilience in every aspect of school life including through the curriculum.
  - Ensuring children are taught about safeguarding including online safety through PSHE lessons, Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) which has been compulsory from September 2020. We understand that Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching.
  - Promoting a caring, safe and positive environment within The School.
  - Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
  - Notifying Children’s Social Care as soon as there is a significant concern.
  - Ensuring that a named teacher is designated for Looked After Children/Children in Need (LAC & CIN) and that up to date list of LAC/CIN is regularly reviewed and updated.
  - Providing continuing support to a student (about whom there have been concerns) who leaves The School by ensuring that such concerns and school medical records are forwarded under confidential cover to the Head at the pupil’s new school as a matter of urgency.
  - Working with partner agencies to support and safeguard children within; Early Help, Children in Need, Child Protection and Looked After Children.
- 8.5 The school understands that provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with certain protected characteristics in order to meet their specific need. A school could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to

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sexual violence or sexual harassment. There is also a duty to make reasonable adjustments for disabled children and young people

### **9. Confidentiality**

- 9.1 We recognise that all matters relating to child protection are confidential.
- 9.2 The SLT or DSL will disclose personal information about a pupil to other members of staff on a need to know basis only. Staff will be informed of relevant details only when the DSL feels their having knowledge of a situation will improve their ability to deal with an individual student/family. A written record will be made of what information has been shared, with whom, and when.
- 9.3 All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.
- 9.4 Information sharing is vital in identifying and tackling all forms of abuse and neglect. As part of meeting a child's needs, we understand it is important to recognise the importance of information sharing between practitioners and local agencies. The school is proactive in sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.
- 9.5 We are aware that the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.
- 9.6 We understand our responsibility to ensure that relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:
  - being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information which is sensitive and personal, and should be treated as 'special category personal data'.
  - understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner but it is not possible to gain consent, it

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cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.

- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt the school will seek independent legal advice.

- 9.7 We are aware that the Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe and that fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
- 9.8 All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's own safety or well-being, or that of another child.
- 9.9 We will always undertake to share our intention to refer a child to Children's Social Care with their parents/carers consent unless to do so could put the child at greater risk of harm, or impede a criminal investigation. If in doubt, we will consult with the Children's Social Care, Duty & Advice Service.

## **10. Supporting staff**

- 10.1 We recognise that staff working in The School who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- 10.2 We will support such staff by providing an opportunity to talk through their anxieties and concerns with the DSL and to seek further support where necessary. This could be provided by, for example, the Principals & DSL.
- 10.3 We understand that staff should have access to advice on the boundaries of appropriate behaviour. The booklet 'Guidance for Safer Working Practice for Adults who work with Children and Young People' & Guidance for safer working practice for those working with children and young people in education settings, (Safer Recruitment Consortium) provides advice on this and the circumstances which should be avoided, in order to limit complaints against staff of abuse of trust, and/or allegations of physical or sexual abuse. These matters form part of staff induction.

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- 10.4 We recognise that DSL's should have access to support and appropriate workshops, courses or meetings as organised or arranged through the Local Authority/LSCP.B. .

### **11. Allegations against staff (including supply staff and volunteers)**

- 11.1 All school staff should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults.
- 11.2 All staff should be aware of the Staff Code of Conduct.
- 11.3 All staff should be aware of the Guidance for Safer Working Practices for Adults who work with Children and Young People
- 11.4 We understand that a pupil or parent may make an allegation against a member of staff:-
- If such an allegation is made, the member of staff receiving the allegation will immediately inform the Principal or Vice Principal if the Principal is not present.
  - The Principal on all such occasions will immediately discuss the content of the allegation with the Local Authority Designated Officer and follow the process for managing the concern laid down in the LSCP.B Procedures
  - If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately consult the LADO, without notifying the Principal first.

In all occasions above, The School will follow the LSCP.B/Local Authority procedures for managing allegations against staff and volunteers as outlined in the appendices

- 11.5 Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult (as in 11.4 above) in making this decision.
- 11.6 In line with this policy and other school procedures for incident reporting/recording, staff and pupils may provide accounts of events which will be stored under our own secure systems and may be produced in the event of any allegation. However, such accounts must not constitute an official statement and the reporting person must not be questioned over their disclosure at this stage.
- 11.7 Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to

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use their services had they not left first, the school will consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

- 11.8 Our School staff are aware of and have an understanding of our 'Guidelines for Avoiding Allegations of Abuse' as outlined in the Appendices

## **12. Whistleblowing**

- 12.1 We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- 12.2 All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. If necessary, they should speak to the Principal or the Local Authority Designated Officer.
- 12.3 All staff are aware of and understand how to use our schools whistleblowing procedures (see appendices)

## **13. Our role in the prevention of abuse**

- 13.1 We recognise that The School plays a significant part in the prevention of harm to our pupils by providing pupils with effective lines of communication with trusted adults, supportive friends and an ethos of protection.
- 13.2 The School community will therefore:
- Establish and maintain an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
  - Ensure that all children know there is an adult in The School whom they can approach if they are worried or in difficulty.
  - We will provide opportunities for students to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.
  - Relevant issues will be addressed through the PSHE/Citizenship curriculum, for example self-esteem, emotional literacy, assertiveness, power, e-safety and bullying.
  - Relevant issues will be addressed through other areas of the curriculum, for example, assemblies, circle time/anjuman, English, History, Art, Computer Science.
  - Other areas of work.
  - All our policies which address issues of power and potential harm, for example bullying, equal opportunities will be linked to ensure a whole school approach.

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- Our safeguarding policy cannot be separated from the general ethos of The School, which should ensure that students are treated with respect and dignity, taught to treat each other with respect, feel safe, have a voice, and are listened to.

### **13.3 Use of school for non-school activities**

Where the proprietor intends to hire or rent out school facilities/premises to organisations or individuals they should ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the proprietor, under the direct supervision or management of their school staff, our arrangements for child protection will apply. However, where services or activities are provided separately by another body this is not necessarily the case. The proprietor should therefore seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed); and ensure that there are arrangements in place to liaise with the school on these matters where appropriate. The proprietor should also ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

### **13.4 Elective Home Education**

Many home educated children have an overwhelmingly positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home the school will discuss the decision with parents to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

Where a child has an EHCP the local authority will need to review the plan whilst working closely with parents.

## **14. Safeguarding students who are vulnerable to extremism**

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Children may be susceptible

to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

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

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

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral

- 14.1 Since 2010, when the Government published the Prevent Strategy and (Revised Prevent Duty Guidance 2015), there has been an awareness of the specific need to safeguard children, young people and families from violent extremism. There have been several occasions both locally and nationally in which extremist groups have attempted to radicalise vulnerable children and young people to hold extreme views including views justifying political, religious, sexist or racist violence, or to steer them into a rigid and narrow ideology that is intolerant of diversity and leaves them vulnerable to future radicalisation.
- 14.2 Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being susceptible to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A

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representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages- an individual will be required to provide their consent before any support delivered through the Channel programme is provided. The designated safeguarding lead should consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

- 14.3 THE SCHOOL values freedom of speech and the expression of beliefs/ ideology as fundamental rights underpinning our society's values. Both students and teachers have the right to speak freely and voice their opinions. However, freedom comes with responsibility and free speech that is designed to manipulate the vulnerable or that leads to violence and harm of others goes against the moral principles in which freedom of speech is valued. Free speech is not an unqualified privilege; it is subject to laws and policies governing equality, human rights, community safety and community cohesion.
- 14.4 The current threat from terrorism in the United Kingdom may include the exploitation of vulnerable people, to involve them in terrorism or in activity in support of terrorism. The normalisation of extreme views may also make children and young people vulnerable to future manipulation and exploitation. THE SCHOOL is clear that this exploitation and radicalisation should be viewed as a safeguarding concern. Definitions of radicalisation and extremism, and indicators of vulnerability to radicalisation are in the appendices
- 14.5 THE SCHOOL seeks to protect children and young people against the messages of all violent extremism including, but not restricted to, those linked to religious ideologies, or to Far Right/Neo Nazi/White Supremacist ideology, Irish Nationalist extremist and Animal Rights movements.
- 14.6 Risk reduction: When any member of staff has concerns that a student may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL in the first instance.
- 14.7 Numerous factors can contribute to and influence the range of behaviours that are defined as violent extremism, but most young people do not become involved in extremist action. For this reason the appropriate interventions in any particular case may not have any specific connection to the threat of radicalisation, for example they may address mental health, relationship or drug/alcohol issues.

## **15. Safeguarding our students who are vulnerable to any form of abuse**

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- 15.1 Our safeguarding policy above through The School's values, ethos and behaviour policies provides the basic platform to ensure children and young people are given the support to respect themselves and others, stand up for themselves and protect each other.
- Our school keeps itself up to date on the latest advice and guidance provided to assist in addressing specific vulnerabilities and forms of exploitation, as outlined below.
  - Our staff are supported to recognise warning signs and symptoms in relation to specific issues, include such issues in an age appropriate way in their curriculum,
  - Our staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos can be signs that children are at risk.
  - Our school works with and engages our families and communities to talk about such issues,
  - Our school staff are supported to talk to families about sensitive concerns in relation to their children and to find ways to address them together wherever possible.
  - Our DSL knows where to seek and get advice as necessary.
  - Our school staff fully understand how to raise a concern using the appropriate channels.

## **16. Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)**

- 16.1 Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. , in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation
- 16.2 Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- 16.3 Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by

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adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

- 16.4 It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.
- 16.5 CSE is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include non-contact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways of grooming a child in preparation for abuse including via the internet.
- 16.6 CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.
- 16.7 Our school staff are aware that sexual and criminal exploitation can take many forms and that pupils may not exhibit external signs of abuse
- 16.8 Therefore, our staff are vigilant for the less obvious signs, such as lots of new electronic equipment, when before there was none, seeming to have extra money to spend, moving away from established friendship groups etc.
- 16.9 Our school staff follow guidance and procedures as outlined in 'Safeguarding Children and Young People from Sexual Exploitation in Leicester, Leicestershire and Rutland' available on the LSCPB website.
- 16.10 Our school staff are aware that if a disclosure is raised in reaction to CSE or CCE, that it will be reported straight to the DSL/SLT or Duty & Advice in their absence

## **17. Child on child abuse including child on child sexual violence and sexual harassment**

- 17.1 Some children are vulnerable to physical, sexual and emotional bullying and abuse by their peers. Such abuse should always be taken as seriously as abuse perpetrated by an adult. It should be the same safeguarding children procedures that as apply in respect of any child who is suffering or at risk of suffering Significant Harm from an adverse source. A significant proportion of sex offences are committed by teenagers and, on occasion, such offences are committed by younger children. Also referred to as Child on child abuse, an example of this is sexting, which is an increasing problem among teenagers. Guidance from the Child exploitation Online protection centre (CEOP) will inform The Schools policy and procedures on child on child abuse (including different gender issues).
- 17.2 Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.
- 17.3 Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying some behaviours related to abuse can lead to a culture of unacceptable behaviour, an unsafe environment and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- Staff and carers of children living away from home need clear guidance and training to identify the difference between consenting and abusive, and between appropriate and exploitative peer relationships. Staff should not dismiss some abusive sexual behaviour as 'normal' between young people and should not develop high thresholds before taking action.
- 17.4 Children and young people who abuse others should be held responsible for their abusive behaviour, while being identified and responded to in a way that meets their needs as well as protecting others.
- 17.5 The LSCPB procedures are written with particular reference to sexually abusive behaviour and concerns about sexually inappropriate behaviour. However, where there are serious child protection concerns as a result of non-sexual violence by a child or young person leading to actual or possible Significant Harm safeguarding and child protection measures should always be implemented.

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- 17.6 If our school staff have a concern that a child might have been abused by another child and/or is displaying inappropriate sexualised behaviour we will in the first instance refer their concerns to the DSL, who will then make a decision on a case by case basis using their professional judgement and with support from external agencies such as children’s social care and the police as required. Allegations of child on child abuse will be taken as seriously as allegations of abuse perpetrated by an adult. Duty & Advice Service (DAS) will discuss directly with the DSL the concerns with and, based on an assessment, decide whether it is necessary to hold a Strategy Discussion and pursue a Section 47 Enquiry.
- 17.7 It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.
- 17.8 Child on child abuse is most likely to include, but may not be limited to:
- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
  - abuse in intimate personal relationships between peers;
  - physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
  - sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
  - sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse;
  - causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - consensual and non-consensual sharing of nudes and semi nudes images and or videos (also known as sexting or youth produced sexual imagery);
  - upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
  - initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

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- 17.9 It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong.
- 17.10 It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school or college should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised.
- 17.11 It is important that schools and colleges consider every report on a case-by-case basis. When to inform the alleged perpetrator(s) will be a decision that should be carefully considered. Where a report is going to be made to children's social care and/or the police, then, as a general rule, the school or college should speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and should not stop the school or college taking immediate action to safeguard their children, where required
- 17.12 Records will be regularly reviewed to identify any patterns of inappropriate or concerning behaviour and ensure it is properly addressed.
- 17.13 If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school will consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

## **18. Domestic violence, abuse and neglect**

- 18.1 The cross-government definition of domestic violence and abuse is 'any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

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- psychological
  - physical
  - sexual
  - financial
  - emotional
- 18.2 Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy).
- 18.3 All school and college staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.
- 18.4 We are aware that domestic abuse can impact on children when they witness it at home and/or suffer it in an intimate personal relationship and can be can be psychological, physical, sexual, financial, or emotional and can impact on children through seeing, hearing or experiencing the effects of domestic abuse and/or experiencing it through their own intimate relationships.
- 18.5 All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.
- 18.6 If The School is made aware of incidents of domestic violence which is impacting on a child within The School, (suspicions and allegations of abuse, harm and significant risk to a child), The School will follow LA and LSCPB guidelines in reporting such concerns to Duty and Advice and will seek guidance where necessary.
- 18.7 In such cases, The School will also work closely with the child and the Principals/DSL will endeavour to support the child who has been exposed to domestic violence, and their parents/carers, where appropriate.

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- 18.8 Furthermore, involvement through the Early Help Offer can also support the child and parents/carers and The School will ensure communications and multiagency working with Social Care and Early Help is maintained to fully support the child and their family.

## **19. Children who are absent from education for prolonged periods and/or repeated occasions**

- 19.1 Children who are absent from education for prolonged periods and/or repeated occasions part of the wider LSCPB procedures<sup>15</sup> (Chapter 2) for children who go missing from School, Home, Care Education and includes Families who go missing.
- 19.2 A pupil missing from education on a number of occasions is a potential indicator of abuse and neglect.
- 19.3 Should a pupil go missing from school (education) our school's Attendance Officer will inform the DSL/SLT and contact the Educational Welfare Service. The DSL will consider further actions and/or support should it be required and to ensure they help identify the any risk of abuse and neglect, including sexual exploitation and to help prevent the risks of them going missing in future. The updated guidance on school attendance Working together to improve school attendance includes information on how schools should work with local authorities children services where school absence indicates a safeguarding concern (<https://www.gov.uk/government/publications/working-together-to-improve-school-attendance> )
- 19.4 Where a child is no longer coming to school where the parent/carer has removed them, The School will ensure that appropriate steps are taken and measures are in place. I.e. we will follow our school guidelines with those parents/carers who decide to educate their pupils at home, follow procedures where a child is taken out of school to go on holiday and where a child is removed from school as the family are moving away.
- 19.5 All relevant partner agencies/services will be notified including Education Welfare, correct forms will be completed and child folders/information will be passed on to the appropriate person (where applicable).

## **20. Female genital mutilation**

- 20.1 Female Genital Mutilation is an illegal operation under the Female Mutilation Act 2003, is a form of child abuse and as such, is dealt with under The School's Child Protection & Safeguarding Policy.

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- 20.2 Definition of Female Genital Mutilation (FGM): FGM comprises of all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs whether for cultural or non-therapeutic reasons.

Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a girl being at risk of FGM, or already having suffered FGM. Therefore, all staff have been briefed on the importance of FGM through safeguarding training, and are aware of some of the signs and symptoms.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380125/MultiAgencyPracticeGuidelinesNov14.pdf)

- 20.3 Responding to FGM - The School will ensure;
- We raise awareness of staff in regard to the issues of FGM through Whole School Training
  - Staff have a clear understanding of what FGM is
  - FGM is within The Schools Safeguarding Policy
  - PHSE curriculum supports pupils understanding of their bodies and keeping themselves safe
  - Monitoring absences
- 20.4 From October 2015, it is a mandatory responsibility of all staff members to report any suspicion of FGM to the police if the child is under 18 years of age. If staff are aware of such concerns, staff **must personally report to the police**, after informing the DSL. A referral and advice from Children's Social Care will also be gained and a referral to the DAS will be made.

## 21. Forced marriages and honour based abuse

- 21.1 A 'forced marriage', as distinct from a consensual 'arranged marriage', is a marriage conducted without the full consent of both parties and where duress is a factor. Duress cannot be justified on religious or cultural grounds."
- 21.2 The Government's definition of a Forced Marriage is:  
A forced marriage is where one or both people do not (or in cases of people with learning disabilities, cannot) consent to the marriage and pressure or abuse is used. It is an appalling and indefensible practice and 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 February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or

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another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

- 21.3 The staff in our school, through induction and whole school training are aware of the importance and impact on a child/student who is involved in such situations.
- 21.4 So called 'Honour based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or community, including Female Genital Mutilation (FGM), forced marriage, and practises such as breast ironing. All forms of so called HBA are abusive, including assault, imprisonment and even murder, regardless of the motivation and should be referred to the DSL or DAS/Police if staff fear a child is in imminent danger.
- 21.5 In such cases, disclosures and concerns relating to Forced Marriage/Honour Based Abuse will be reported directly to the DSL and the Police due to the impact it could have on the child/student in the wider community. Information will be sought from Duty and Advice where appropriate.

## **22. Upskirting**

- 22.1 'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence.
- 22.2 Where a child reports cases of upskirting or an incident becomes known, disclosures and concerns will be reported directly to the DSL and the Police. Information will be sought from Duty and Advice where appropriate.

## **23. Serious youth violence**

- 23.1 All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 23.2 Our staff are aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or

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permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

- 23.3 If a member of staff suspects a pupil may be involved with gangs or affiliated with serious violence crime, they must inform the DSL or Deputy DSL.

## **24. Mental health**

- 24.1 Our staff are that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- 24.2 Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Our Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- 24.3 Our staff understand that where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- 24.4 If staff have a mental health concern about a child that is also a safeguarding concern, they will immediately inform the DSL or in their absence the DDSL.
- 24.5 Our school has access to a range of advice to help identify children in need of extra mental health support, including working with external agencies which can be found in <https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools-2>

## **25. Children potentially at a greater risk of harm**

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

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

Once the Local authorities have shared the fact a child has a social worker, the designated safeguarding lead will hold and use this information so that decisions can be

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made in the best interests of the child's safety, welfare and educational outcomes. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children which can be found in the section 'Confidentiality'

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

### **25.2 Children requiring mental health support**

We are aware that we have an important role to play in supporting the mental health and wellbeing of their pupils/students and that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. See section 'Mental health' for more detail.

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

The most common reason for children becoming looked after is as a result of abuse and/or neglect. The school understand its responsibility to ensure that staff have the skills, knowledge and understanding to keep looked after children safe and that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility.

They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead will have details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

We are aware that a previously looked after child potentially remains vulnerable and thus all staff should have the skills, knowledge and understanding to keep previously looked after children safe. We understand that when dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

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

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In

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some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

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

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

### **26. Online safety**

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

- **content:** being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- **contact:** being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- **conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.
- **commerce** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The school has a responsibility of doing all that they reasonably can to limit children's exposure to the above risks from the school's IT system. As part of this process the school has ensured the school has appropriate filters and monitoring systems in place and this is reviewed at least annually. The proprietor reviews the standards and discuss with IT staff, DSL and service providers to see what more needs to be done to support schools and colleges in meeting this standard

The DSL takes the lead responsibility for filtering and monitoring systems in place. The proprietor will consider the number of and age range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus

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safeguarding risks. The school understands that it is important to block harmful and inappropriate content without unreasonably impacting teaching and learning.

For filtering, the school uses Securly to block inappropriate and illegal websites for students and staff using the school devices as well as anyone using the school network. It can also block search terms on a search engine. As a default, safe search is enabled for all school devices.

For monitoring, the school uses classroom.cloud which is a console on which the teacher is able to view all of the students' devices in one place as well as have control over their devices.

Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. The school is expected to consider a whole school approach to online safety. Although many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular, the school prohibits students from keeping mobile phones with them whilst in school. See the school's use of mobile phones policy.

The school ensures pupils/students understand the dangers of the internet and importance of keeping oneself safe online through lessons in Computer Science and PSHE as well as throughout the curriculum where relevant.

As part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online safety, staff undergo annual online safety training as part of inset day training including current filtering and monitoring systems in place.

The school understands that technology and risks of harm related to it evolve and changes rapidly and annually review our approach to online safety.

Further information can be found in the school's Online Safety policy

Where it becomes necessary for remote education, the school will follow the advice given by the department of education on the following links:

<https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

Below are some links with additional information on online safety for staff, parents and pupils/students:

| <b>Organisation/Resource</b>                                                                                                                                                      | <b>What it does/provides</b>                                                   |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------|
| <a href="http://www.thinkuknow.co.uk/">http://www.thinkuknow.co.uk/</a>                                                                                                           | NCA CEOPs advice on online safety                                              |
| <a href="https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/">https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/</a> | Home Office advice on healthy relationships, including sexting and pornography |
| <a href="https://parentzone.org.uk/">https://parentzone.org.uk/</a>                                                                                                               | Help for parents on how to keep their children safe                            |

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|                                                                                     |                                                                                                               |
|-------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------|
|                                                                                     | online                                                                                                        |
| <a href="http://www.educateagainsthate.com/">http://www.educateagainsthate.com/</a> | Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation |
| <a href="https://www.net-aware.org.uk/">https://www.net-aware.org.uk/</a>           | NSPCC advice for parents                                                                                      |

### **27. What we do when we are concerned**

Where risk factors are present but there is no evidence of a particular risk then our DSL/SLT advises us on preventative work that can be done within school to engage the student into mainstream activities and social groups. The DSL/SLT may well be the person who talks to and has conversations with the student's family, sharing The School's concern about the young person's vulnerability and how the family and school can work together to reduce the risk.

In this situation, depending on how worried we are and what we agree with the parent and the young person (as far as possible). The DSL can decide to notify DAS, Early Help or Family Support Services so that a strategic overview can be maintained and any themes or common factors can be recognised; and The School will review the situation after taking appropriate action to address the concerns.

The DSL will also offer and seek advice about undertaking an early help assessment and/or making a referral to Early Help services.

In addition to the above, our School staff will refer to the Appendix 'Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child' when dealing with a child disclosure or an allegation of abuse.

### **28. Policy review**

This policy will be reviewed at least annually and when required by the Principal and DSL

### **29. Other relevant policies**

Our principal's legal responsibility for safeguarding the welfare of the children in our school goes beyond child protection. Their duty is to ensure that safeguarding permeates all activity and functions. This policy therefore complements and supports a range of other policies, for instance:

- Staff Code of Conduct
- Anti-bullying policy
- Restraint of pupils policy
- Behaviour policy
- First Aid policy
- Health and Safety

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- Equality statement
- Online safety
- PREVENT policy

The above list is not exhaustive and when undertaking development or planning of any kind The School and the Principal will need to consider the implications for safeguarding children and promoting their welfare.

### **30. Useful contacts**

- **Safeguarding Children’s Unit:** 0116 454 2440
- **LCC Duty & Advice (includes out of hours):** 0116 454 1004
- **Safeguarding in Education Development Officer:** Mohammed Patel  
0116 2440 / Safeguardingineducation@leicester.gov.uk
- **Local Authority Designated Officer (LADO):** Jude Atkins, 0116 454 2440
- **SAFE Project (DV Support):** 0300 123 0918
- **Forced Marriage Unit:** 020 7008 0151 / fmu@fco.gov.uk / fmuoutreach@fco.gov.uk
- **NSPCC helpline:** 0808 800 5000
  
- **Prevent**
  - **Leicestershire Police Prevent team**  
preventengagement.team@leicestershire.pnn.police.uk, 0116 6726
  - **Prevent Coordinator Leicester:** Will Baldet, 07403 727727
  - **Prevent Education Officer:** Ailsa Coull, Ailsa.Coull@leicester.gov.uk  
01164 546923/07519 0698

## **Appendix A: Definition and indicators of abuse**

### **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); or
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. The following may be indicators of neglect (this is not designed to be used as a checklist):

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

### **Physical abuse**

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

- The following may be indicators of physical abuse (this is not designed to be used as a checklist): Multiple bruises in clusters, or of uniform shape;

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

### **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit act of sexual abuse, as can other children.

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

- Sexually explicit play or behaviour or age-inappropriate knowledge;
- Anal or vaginal discharge, soreness or scratching;
- Reluctance to go home;
- Inability to concentrate, tiredness;
- Refusal to communicate;
- Thrush, persistent complaints of stomach disorders or pains;
- Eating disorders, for example anorexia nervosa and bulimia;
- Attention seeking behaviour, self-mutilation, substance abuse;
- Aggressive behaviour including sexual harassment or molestation;
- Unusual compliance;

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- Regressive behaviour, enuresis, soiling;
- Frequent or open masturbation, touching others inappropriately;
- Depression, withdrawal, isolation from peer group;
- Reluctance to undress for PE or swimming; or
- Bruises or scratches in the genital area.

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

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity

- (a) in exchange for something the victim needs or wants, and/or
- (b) for the financial or other advantage of the perpetrator or facilitator and/or
- (c) through violence or the threat of violence.

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country forced to shoplift or pickpocket, or to threaten other young people.

Some of the following can be indicators of CCE:

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

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child 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. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

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- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered.

If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

A number of the indicators for CSE and CCE may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

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

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### **Emotional abuse**

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

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

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

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

### **Response from parents**

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

- Delay in seeking treatment that is obviously needed;
- Unawareness or denial of any injury, pain or loss of function (for example, a fractured limb);
- Incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development;

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- Reluctance to give information or failure to mention other known relevant injuries;  
Frequent presentation of minor injuries;
- A persistently negative attitude towards the child;
- Unrealistic expectations or constant complaints about the child;
- Alcohol misuse or other drug/substance misuse;
- Parents request removal of the child from home; or
- Violence between adults in the household.

### **Disabled children**

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

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

### **Modern Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. <https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims>

### **Cybercrime**

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

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- unauthorised access to computers (illegal ‘hacking’), for example accessing a school’s computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or ‘booting’. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and,
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

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

Note that Cyber Choices does not currently cover ‘cyber-enabled’ crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

## **Appendix B: Indicators of vulnerability to radicalisation**

1. Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism leading to terrorism.
2. Extremism is defined by the Government in the Prevent Strategy as: ‘Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas.’
3. Extremism is defined by the Crown Prosecution Service as: The demonstration of unacceptable behaviour by using any means or medium to express views which:
  - Encourage, justify or glorify terrorist violence in furtherance of particular beliefs;
  - Seek to provoke others to terrorist acts;
  - Encourage other serious criminal activity or seek to provoke others to serious criminal acts; or
  - Foster hatred which might lead to inter-community violence in the UK.
4. There is no such thing as a “typical extremist”: those who become involved in extremist actions come from a range of backgrounds and experiences, and most individuals, even those who hold radical views, do not become involved in violent extremist activity.
5. Students may become susceptible to radicalisation through a range of social, personal and environmental factors - it is known that violent extremists exploit vulnerabilities in individuals to drive a wedge between them and their families and communities. It is vital that school staff are able to recognise those vulnerabilities.
6. Indicators of vulnerability include:
  - Identity Crisis – the student 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;

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- Unmet Aspirations – the student may have perceptions of injustice; a feeling of failure; rejection of civic life;
  - Experiences of Criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement/reintegration; and
  - Special Educational Need – students may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others.
7. 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.
8. 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; and
  - Joining or seeking to join extremist organisations; and
  - Significant changes to appearance and/or behaviour;
  - Experiencing a high level of social isolation resulting in issues of identity crisis and/or personal crisis.
9. Further information can be found in The School's PREVENT policy

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### **Appendix B: Procedure to follow in cases of possible, alleged or suspected abuse, or serious cause for concern about a child for all staff including supply staff and volunteers**

Teachers are in a unique position to identify and help children who may be being abused. Although all schools are required to have a named designated teacher with responsibility for co-ordinating child protection, this should not diminish the role all teachers have in protecting children. Child abuse usually comes to the attention of teachers in one of four ways:

- a direct allegation from the child being abused,
- a third party (e.g. friend, classmate) report,
- through the child's behaviour,
- or through observation of an injury to the child.

When a child makes a disclosure, or when concerns are received from other sources, do not investigate, ask leading questions, examine children, or promise confidentiality. You may ask questions of a clarifying nature – such as 'who, what, where, when, how?' or use the acronym TED – 'Tell me, 'Explain it to me', Describe it to me.' Remember, the way in which you talk to the child may have an effect on any subsequent legal proceedings. You need to be open and non-judgemental. Children making disclosures should be reassured and, if possible at this stage, should be informed what action will be taken next.

As soon as possible use the school's electronic referrals process to note of what has been disclosed or noticed, said or done and report to the Designated Safeguarding Lead (DSL). It is important to act swiftly to avoid delays.

As a general guide, it is important to remember the following:

**SECRETS** - A child's trust can place a heavy responsibility on teachers, particularly if they want the abuse to remain a secret. You should tell the child that if he or she is being hurt you will need to tell other people. The child may need to be reassured that you will only speak to those who need to know and that they will treat the matter confidentially.

**LISTEN** - Listen carefully to the child. Take what he or she says seriously as it is rare for a child to make entirely false allegations.

**REASSURE** - Reassure the child that he or she was right to tell and is not to blame for what happened, but do not promise confidentiality.

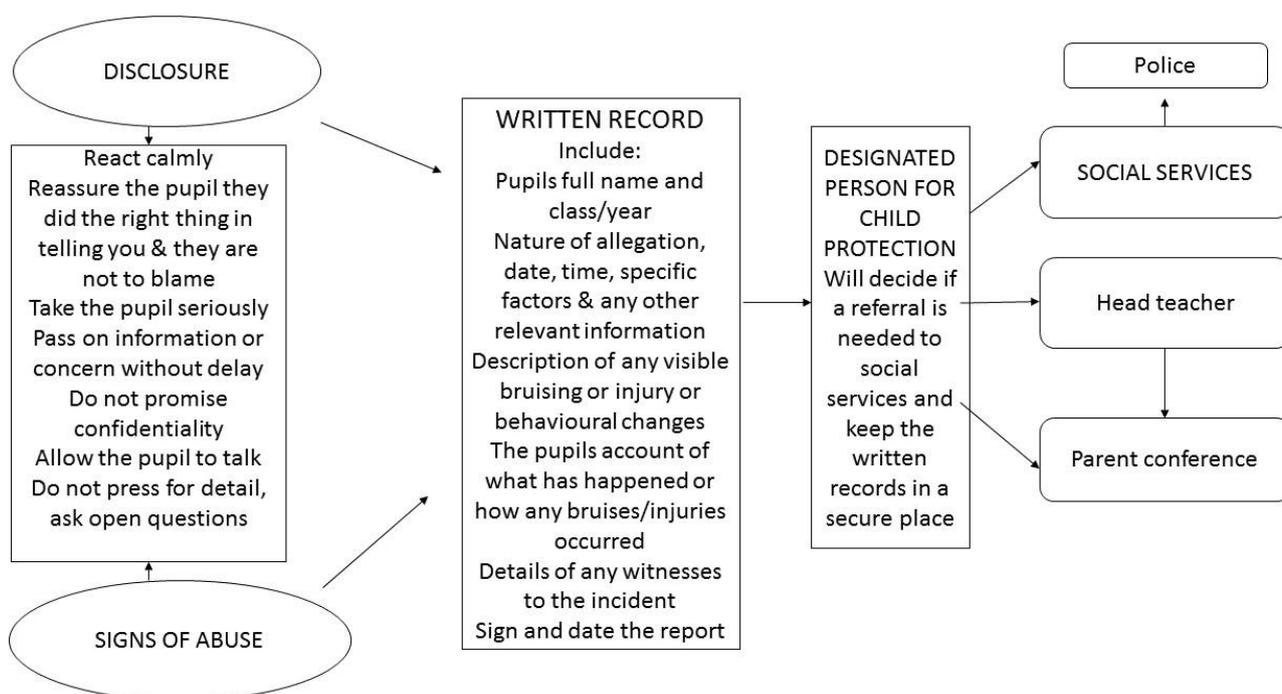
**RECORD** - As soon as possible after talking with the child, make a written record of what was said at the time, when and where the conversation took place and who was present. This must be

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accurate and not interpretation or assumption. Note any colloquial/slang words used by students and any language/behaviour inappropriate for the child’s age – do not convert them into proper terms. Remember this may be used in any subsequent legal proceedings so note down too, how the child was behaving and the way in which they told you what was happening. This may indicate how the child was feeling. For injuries in specific areas, record the location accurately – **DO NOT** take photographs or examine the child yourself.

**SUPPORT** - Get support for yourself. Listening to abused children can be very upsetting, and giving the child help may be difficult, if you are not given support yourself. Experience of working with children is not, in itself, preparation for the distress abuse can raise.

**REMEMBER** - It takes courage and determination for a child to tell an adult that they are being, or have been, abused. When they do tell someone, it is usually a person who they feel they can trust and whom they feel is reliable. For reasons of confidentiality, only those people who need to know about the abuse should be told, and conversations about the child should always be held in private.



**If the concern involves the conduct of a member of staff or volunteer, a visitor, a trainee or another young person or child, the DSL/Principal must be informed as a matter of urgency; if the concern is in reaction to your DSL, you must speak to the Principal. If you feel you cannot speak with the Principal, you must use your whistleblowing procedure and contact Duty & Assessment/LADO for advice and support.**

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

## Appendix C: Procedures relating to allegations about a member of staff (including supply staff and volunteers)

This appendix is in two parts:

- Section one: Allegations that may meet the harms threshold
- Section two: Concerns that do not meet the harm threshold

### **Section one: Allegations that may meet the harms threshold**

This section is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

1. Inappropriate behaviour by staff/volunteers could take the following forms:

- **Physical**

For example the intentional use of force as a punishment, slapping, use of objects to hit with, throwing objects or rough physical handling.

- **Emotional**

For example intimidation, belittling, scapegoating, sarcasm, lack of respect for children's rights, and attitudes that discriminate on the grounds of race, gender, disability or sexuality.

- **Sexual**

For example sexualised behaviour towards students, sexual harassment, sexual assault and rape.

- **Neglect**

For example failing to act to protect a child or children, failing to seek medical attention or failure to carry out an appropriate risk assessment.

2. If a child makes an allegation about a member of staff, visitor or volunteer the Principal should be informed immediately. The Principal should carry out an urgent initial consideration in order to establish whether there is substance to the allegation. The Principal should not carry out the investigation him/herself or interview students.

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3. The Principal must exercise, and be accountable for, their professional judgement on the action to be taken, as follows –
  - If the actions of the member of staff, and the consequences of the actions, raise credible child protection concerns the Principal will notify the Local Authority Designated Officer (LADO) Team.
  - The LADO Team will advise about action to be taken, and may initiate internal referrals within children’s social care to address the needs of children likely to have been affected.
  - If the actions of the member of staff, and the consequences of the actions, do not raise credible child protection concerns, but do raise other issues in relation to the conduct of the member of staff or the student (s), these should be addressed through The School’s own internal procedures.
  - If the Principal decides that the allegation is without foundation and no further formal action is necessary, all those involved should be informed of this conclusion, and the reasons for the decision should be recorded on the child protection file.
  
4. Where an allegation has been made against the Principal who is also the Proprietor, then the principal takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of the procedure, please refer to the LSCPB Website and refer to the Whistleblowing Procedures

### **Supply teachers**

Where the school has to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as ‘the agency’).

Whilst the school is not the employer of supply teachers from such agencies, we will ensure allegations are dealt with properly. In no circumstances will we decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. The Principal will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children’s social services. The school will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the proprietor when working in the school. The allegations management meeting which is often arranged by the LADO should address issues such as

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information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, we will inform the agency of our process for managing allegations. This will include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information.

### **Record Keeping:**

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

### **Section two: Concerns that do not meet the harm threshold**

Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

#### **Low level concerns**

As part of their whole school approach to safeguarding, schools should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical

The aim is to create and encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

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The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harms threshold.

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is crucial that any such concerns, including those which do not meet the harm threshold, are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

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

If the concern was raised by the individual themselves, the principal will speak to the individual and any witnesses and any other relevant parties.

If the concern has been raised via a third party, the principal will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for their decisions and action taken.

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### **Record keeping**

All low-level will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records will be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school will decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it will be referred to the LADO. Consideration will also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.

The school will retain the information until the individual leaves their employment.

## **Appendix D: Guidelines for avoiding allegations of abuse for all staff members**

Whilst they may in common law be regarded as acting in loco parentis, teachers and carers in school should remember that they are not able to take the place of parents in providing physical comfort. This is not to say that all physical contact is inappropriate, rather that the professional context demands circumspection and a sense of fitness for purpose.

Teachers of very young children of nursery and Key stage 1 age will naturally need to engage in more physical contact than teachers of older children. Comforting a distressed child who may just have started school will not be an unusual occurrence. Similarly, in the special school setting, some children may tend towards demanding physical attention. In such circumstances, the contact by the adult will be for re- assurance and may involve physical closeness (e.g. holding the child's hand or placing hands on the child's shoulders). Hugging and kissing would be inappropriate for other than the parent, even though the child may want to initiate it.

Administration of medicines and first aid requires careful codes of conduct and procedures. These should be laid down by local authority or health authority or in individual school guidelines and followed meticulously. As a rule of thumb, teachers should not administer medicines. If the child had an adverse reaction to a medicine given by a teacher, the teacher could be held liable and charged with negligence.

Administration of first aid should be undertaken by a qualified first aider. Where none is available, the minimum steps should be taken to ensure the child's safety and the emergency services should be called.

Teachers may sometimes be called upon to intervene physically if a child or children are in danger of injuring themselves or others - as in a fight in The School yard. It is important that in such circumstances the minimum possible reasonable force is used. Where possible another colleague should be called upon to assist, both to minimise the risk of injury to the teacher intervening and to act as witness that reasonable force and no more was used. After such an event a clear record of what took place should be made, including where possible statements from witnesses. The Principal should be informed.

One-to-one situations with pupils/students need to be carefully and consciously managed. Some teaching, as with peripatetic music staff, may often suggest one-to-one organisation. Where pupils/students can be paired for such lessons, it is preferable. Where this is not possible and in other situations of individual interviews with pupils/students, it is advisable to use a room with a window where others can see in or to leave the door open. If confidentiality makes this difficult, then another member of staff should be informed that the interview is taking place.

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If a child becomes distressed, support and re-assurance should be offered through calming words rather than through physical contact. Teachers should not become involved with children's personal problems beyond listening and being sensitive to them in order to refer the child to the most appropriate source of help or counselling.

Staff should refer to the 'Staff code of conduct' as part of this guide.

## **Appendix D: Whistleblowing procedures**

### **1.Introduction**

This policy applies to all employees and the Principal who is also the Proprietor. Other individuals performing functions in relation to the organisation, such as agency workers and contractors, should have a copy of this also or have least read a copy.

It is important to the School that any fraud, misconduct or wrongdoing by employees is reported and properly dealt with. The Proprietor will, therefore, respond to all individuals who raise any genuine concerns that they may have about the conduct of others in The School, which are in the public interest. This policy sets out the way in which individuals may raise any concerns that they have and how those concerns will be dealt with.

1.1 The School expects the highest standards of conduct from all employees and the principal who is also the Proprietor and will treat seriously any concern raised about illegal or improper conduct.

1.2 Any individual covered by this policy will be expected, through agreed procedures and without fear of recrimination, to bring to the attention of the Principal any serious impropriety or breach of procedure.

1.3 Employees who do not follow the steps identified in this procedure or other agreed internal procedures, and take their concerns to other outside sources (e.g. the press), may be subject to a formal disciplinary investigation.

### **2.Background**

The law provides protection for employees who raise legitimate concerns about specified matters. These are called 'qualifying disclosures'. A qualifying disclosure is one made in the public interest by the employee who has a reasonable belief that:

- A criminal offence
- A miscarriage of justice
- An act creating risk to health and safety
- An act causing damage to the environment
- Corruptly receiving any gift or advantage, thus failing to comply with the Bribery Act 2010
- Allowing private interests to override the interests of The School
- A breach of any legal obligation; or
- concealment of any of the above

is being, has been, or is likely to be, committed. It is not necessary for the employee to have proof that such an act is being, has been, or is likely to be committed,- a reasonable belief is sufficient.

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The employee has no responsibility for investigating the matter; it is The School's responsibility to ensure that an investigation takes place.

2.1 Where the concerns are about safeguarding children or young people, The School's Designated Safeguarding Lead for Child Protection should be notified (See section 7.2).

2.2 It is a procedure in which the principal will be expected to act swiftly and constructively in the investigation of any concerns in accordance with The School's disciplinary procedure.

2.3 Concerns about a colleague's professional capability should not be dealt with using this procedure (but see section 7 below)

### **3. When should it be used?**

This procedure is for disclosures about matters other than a breach of an employee's own contract of employment. If an employee is concerned that his/her own contract has been, or is likely to be, broken he/she should use The School's Grievance procedures.

Where a disclosure is merely an expression of opinion that fails to show that a legal obligation has been or is likely to be breached, it cannot amount to a protected or qualifying disclosure for the purposes of the whistle blowing legislation

3.1 So this procedure is not designed to replace or be used as an alternative to the grievance procedure, which should be used where an employee is only aggrieved about his/her own situation. Nor should this policy apply where the employee simply disagrees with the way The School is run.

3.2 Employees must have reasonable grounds for believing the information they have is accurate and not just idle gossip or rumour.

3.3 An employee who makes such a protected disclosure has the right not to be dismissed, subject to any other detriment, or victimised, because he/she has made a disclosure, provided it has not been made maliciously. Any employee who uses this procedure will not be penalised for doing so. The employer will not tolerate harassment and/or victimisation of any employee raising concerns.

3.4 An employee who is not sure whether the conduct he/she is concerned about does constitute illegal or improper conduct or is unsure about how to proceed may contact the Leicester City Council HR Department – 0116 454 4310 or email: [hrpolicy@leicester.gov.uk](mailto:hrpolicy@leicester.gov.uk) or their Professional Association/Trade Union OR the NSPCC Whistleblowing Advice line on 08000280285, email – [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

3.5 Financial regulations require that any suspicion of fraud, corruption or other financial irregularity is reported to Internal Audit for possible investigation. Normally an employee must first report any suspicion of such an irregularity to the Principal (but see 5), who will in turn report it to Internal Audit.

### **4. Principles**

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- 4.1 Any matter raised under this procedure will be investigated thoroughly, promptly and confidentially, and the outcome of the investigation reported back to the employee who raised the issue.
- 4.2 No employee will be victimised for raising a matter under this procedure. This means that the continued employment and opportunities for future promotion or training of the employee will not be prejudiced because he/she has raised a legitimate concern.
- 4.3 Victimisation of a worker for raising a qualified disclosure will be a disciplinary offence.
- 4.4 If misconduct is discovered as a result of any investigation under this procedure the matter will be considered under the disciplinary procedure, in addition to any appropriate external measures.
- 4.5 Maliciously making a false allegation is a disciplinary offence.
- 4.6 An instruction to cover up wrongdoing is in itself a disciplinary offence. If told not to raise or pursue any concern, even by a person in authority, employees should not agree to remain silent.

### **5.Procedure**

- 5.1 In the first instance, unless the employee reasonably believes his/her Principal to be involved in the wrongdoing, any concerns should be raised with the employee's Principal. If he/she believes the Principal to be involved, then the employee should raise the concern with the the Local Authority Designated Officer (LADO) directly.
- 5.2 The principal will arrange an investigation into the matter (either by investigating the matter himself/herself or immediately passing the issue to someone in a senior position). The investigation may involve the employee and others involved giving written statements. Any investigation will be carried out in accordance with the principles set out above. The employee's statement will be taken into account and he/she will be asked to comment on any additional evidence obtained.

Employees who want to use the procedure but feel uneasy about it may wish to consult their Professional Association/Trade Union initially and bring a colleague or Professional Association/Trade Union Representative along to any discussions, so long as the third party is not involved in the issue.

Where anonymity is requested efforts will be made to meet the request where appropriate but that might not always be possible. The earlier and more open the expression of concern the easier it will be to take appropriate action.

- 5.3 The Principal (or the person who carried out the investigation will then report to the principal) will take the necessary action including reporting the matter to any appropriate department or regulatory agency. If disciplinary action is required this will be taken forward by the Principal. On conclusion of any investigation, the employee will be told the outcome of the investigation and what the next steps will be. If no action is to be taken, the reason for this will be explained.

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If the employee is concerned that his/her Principal is involved in the wrongdoing, has failed to make a proper investigation or has failed to report the outcome of the investigation, he/she should inform the Leicester City Council, HR Department. Employees who feel unable to follow this route, for whatever reason, have the option of contacting one of the following:

- HM Revenue and Customs
- The Financial Services Authority
- The Office of Fair Trading
- The Health and Safety Executive
- The Environment Agency
- The Director of Public Prosecutions
- The Serious Fraud Office
- The Education Funding Agency
- The Department for Education
- The National College for Teaching and Leadership

### **6. What should be done if an issue is raised with a member of staff?**

6.1 If a member of staff, other than the Principal, is approached by a colleague on a matter of concern as defined in this document, he/she is advised to take the matter to the Principal as above point 5.

### **7. Safeguarding Children and Young People**

7.1 All employees have a duty to report concerns about the safety and welfare of pupils/students.

7.2 Concerns about any of the following should be reported to the Designated Safeguarding Lead for Child Protection (DSL):

- physical abuse of a pupil/student
- sexual abuse of a pupil/student
- emotional abuse of a pupil/student
- neglect of a pupil/student
- issues relating to Female Genital Mutilation, Children who are absent from education for prolonged periods and/or repeated occasions, Child Sexual Exploitation & Radicalisation
- an intimate or improper relationship between an adult and a pupil/student
- improper behaviour or conduct of staff towards children

7.3 The reason for the concern may be the actions of a colleague (including a more senior colleague), the principal, another pupil/student or someone outside the school. Whatever the reason, concerns must be reported. Failure to report a Child Protection related allegation will be in itself, a disciplinary matter.

### **Laws relating to this document**

Employment Rights Act 1996

## ***Safeguarding and child protection policy***

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Public Interest Disclosures Act 1998 (Whistleblowing)

Human Rights Act 1998 (Duty of care)

The legislation protecting individuals who makes a protected disclosure applies not only to employees, but also to any person who undertakes to do or perform personally (or otherwise) any work or service for the employer, regardless of the nature of the contractual relationship between them.

A Whistleblowing Policy should establish the procedure for an employee to follow if he/she has a genuine concern about a colleague's conduct or the organisation's practices. The Whistleblowing Policy should make clear what sort of allegations will count as a protected disclosure and should allow for the employee to raise these concerns with a nominated person and set out the steps that the employer will take in response.

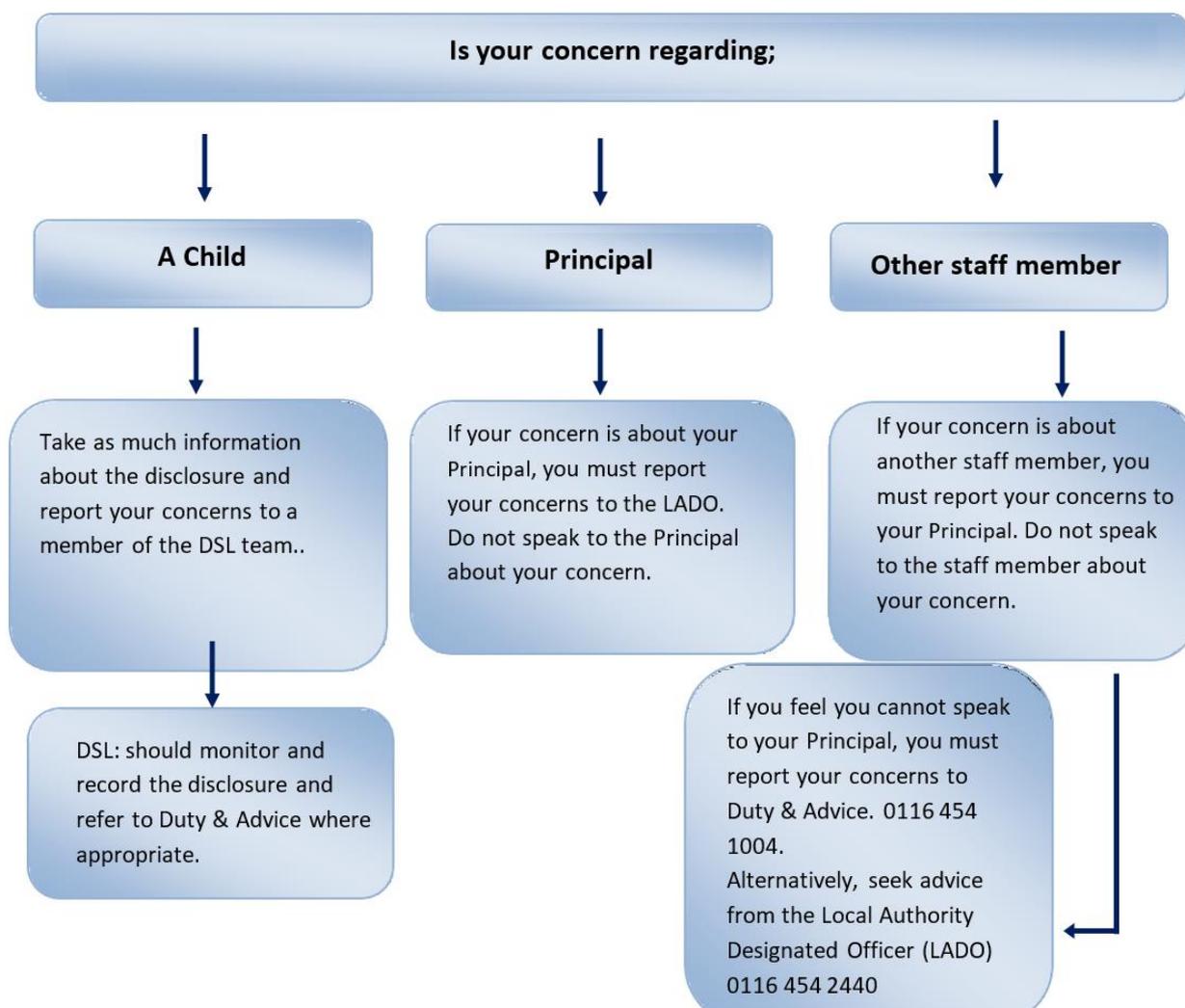
A qualifying disclosure means any disclosure of information that in the reasonable belief of the worker is made in the public interest. The requirement that a whistleblower make a qualifying disclosure 'in good faith' has been removed. Therefore, while the employer can seek a declaration from the whistleblower that he or she is not knowingly making a false allegations, disciplinary action is likely to be appropriate only where there is clear evidence that the employee has misused the whistle blowing procedure. A consequence of the requirement that a disclosure be made in the public interest is that an employee will generally be precluded from being able to 'blow the whistle' about breaches of his or her employment contract.

Section 43J of the Employment Rights Act 1996 provides that a Settlement Agreement made between an employee and employer cannot prevent future protected disclosures. Any confidentiality obligations in contracts of employment that would prevent an employee making a protected disclosure will be void.

Public Interest Disclosure Act (whistleblowing) protects workers in private, public and voluntary organisations, if in the public interest they blow the whistle on wrongdoing.

If you want to raise a concern in your school and wish to whistle blow for wrongdoing, in the first instance, use the following diagram for guidance;

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If a member of staff has concern about another member of staff/colleague or is concerned about a malpractice in The School or feel The School has not taken appropriate action regarding an important issue (ie safeguarding) the employee should first and foremost speak to the Principal.

Should the employee want to raise the matter with someone outside The School or their matter is concerning the Principal who is also the Proprietor then they should contact the LADO at the safeguarding unit.

The School will take all issues raised seriously.

The Principal will exercise confidentiality to protect the identity of the employee reporting the concern/malpractice from other staff members.

**Concerns about the proprietor of an independent school should go directly to the LADO**