

**Safeguarding & Child Protection Policy September 2022**

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# Safeguarding Ethos

Children and young people have a fundamental right to be protected from harm. They have a right to expect schools to provide a safe and secure environment. It is a guiding principle of the law and children protection procedures that the protection and welfare of a child must always be that priority. Failure to provide an effective response can have serious consequences for the child.

# Child Protection Policy Statement

St Margaret’s at Hasbury CE Primary School is committed to safeguarding and promoting the welfare of all children and young people both within the school environment and outside. Safeguarding and promoting the welfare of children is everyone’s responsibility. All staff who come into contact with children and their families and carers have a role to play in safeguarding children. In order to fulfil the responsibility effectively, the school will ensure their approach is child centred. This means they will consider, at all times, what is in the best interests of the child.

Because of our day-to-day contact with children and young people, education staff are particularly well placed to observe outwards signs of abuse, changes in children’s behaviour or their failure to develop. We need, therefore, to create a culture of vigilance, to be alert to the possibility of abuse occurring, and to be aware of and have confidence to follow these procedures if suspicions are raised.

This policy applies to all staff, governors and volunteers working in school.

# 1. Purpose and Aims

**The school aims to ensure that**:

* Appropriate action is taken in a timely manner to safeguard and promote children’s welfare
* All staff are aware of their statutory responsibilities with respect to safeguarding
* Staff are properly training in recognising and reporting safeguarding issues

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

**We give special consideration to children who:**

* Have special educational needs (SEN) or disabilities
* Are young carers
* May experience discrimination due to their race, ethnicity, religion, LGBTQ+, gender identification or sexuality
* Have English as an additional language
* Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
* Are at risk of FGM, sexual and criminal exploitation, forced marriage, or radicalisation
* Are asylum seekers
* Are at risk due to either their own or a family member’s mental health needs
* Are Children in Care or previously Children in Care

# 2. Statutory Framework

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education (2022)](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1080047/KCSIE_2022_revised.pdf) and [Working Together to Safeguard Children (2018)](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2), and the [Governance Handbook](https://www.gov.uk/government/publications/governance-handbook). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

* Section 175 of the [Education Act 2002](http://www.legislation.gov.uk/ukpga/2002/32/section/175), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
* [The School Staffing (England) Regulations 2009](http://www.legislation.gov.uk/uksi/2009/2680/contents/made), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
* [The Children Act 1989](http://www.legislation.gov.uk/ukpga/1989/41) (and [2004 amendment](http://www.legislation.gov.uk/ukpga/2004/31/contents)), which provides a framework for the care and protection of children
* Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/female-genital-mutilation), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
* [Statutory guidance on FGM](https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
* [The Rehabilitation of Offenders Act 1974](http://www.legislation.gov.uk/ukpga/1974/53), which outlines when people with criminal convictions can work with children
* Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](http://www.legislation.gov.uk/ukpga/2006/47/schedule/4), which defines what ‘regulated activity’ is in relation to children
* [Statutory guidance on the Prevent duty](https://www.gov.uk/government/publications/prevent-duty-guidance), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Information Sharing (2018) <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/Information_sharing_advice_practitioners_safeguarding_services.pdf>

* The [Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018](http://www.legislation.gov.uk/uksi/2018/794/contents/made) (referred to in this policy as the 2018 Childcare Disqualification Regulations) and [Childcare Act 2006](http://www.legislation.gov.uk/ukpga/2006/21/contents), which set out who is disqualified from working with children
* This policy also meets requirements relating to safeguarding and welfare in the [Early years foundation stage statutory framework (EYFS) March 2021](file:///\\dudley.gov.uk\filestore\Childrens%20Services\Childrens%20Specialist%20Services\C&RU\EduSGTraining\ALL%20YEAR%202021%202022\2122%20ALL%20THINGS%20TRAINING\WHOLE%20SCHOOL%20TRAINING%20PACKAGE\EYFS_framework_-_March_2021.pdf)
* <https://safeguarding.dudley.gov.uk/safeguarding/partnership/meetings/safeguarding-children-partnership-group/>

# 3. The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSLs are Sara Shepherd (Headteacher), Louisa Hill (Deputy Headteacher) and Michelle Stokes (Inclusion Manager). The DSLs takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.

When *Sara Shepherd is absent, Louisa Hill/Michelle Stokes* will act as cover.

During term time, the DSLs will be available during school hours for staff and agencies to discuss any safeguarding concerns. Sara Shepherd has provided the authority with her contact details (mobile number, email address) and is contactable out of school hours and during the holidays. In the absence of the DSLs, the most senior member of staff in school will assume responsibility for any child protection matters that arise.

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

* + Work closely with teachers and share information & provide advice and support to other staff on child welfare and safeguarding and child protection matters
  + Sets out procedures so that staff promptly share their safeguarding concerns in writing
  + Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including

children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff. Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

* + 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.
  + Refer cases to the Channel programme where there is a radicalisation concerns, as required, and support staff who make referrals to the Channel programme.
  + Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
  + Refer cases where a crime may have been committed to the Police
  + Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
  + Contribute to the assessment of children, particularly in relation to Early Help
  + Work closely with Mental Health Leads
  + Refer suspected cases, as appropriate, to the relevant body (local authority children’s social care, Channel Panel, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
  + The DSL will also keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

**4. The Headteacher, Governing Body, Trustees, Proprietors**

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

* Ensuring that staff (including temporary & supply staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
* Communicating this policy to parents when their child joins the school and via the school website
* Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
* Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
* Acting as the ‘case manager’ in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
* Refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service/Teaching Regulatory Agency/TRA as required
* Complete appropriate safeguarding and child protection (including online) training
* Making sure each child in the Early Years Foundation Stage is assigned a key person

**The Governing body, Trustees or Proprietors will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation**.

The Governing Body/Trust will appoint a senior board level (or equivalent) lead [Safeguarding Governor, Julia Balston to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Chair of governors, Jane Price, will act as the ‘case manager’ if an allegation of abuse is made against the headteacher, where appropriate (see appendix 2).

Our governing body will ensure they comply with their duties under legislation. They will have regard to Keeping Children safe in Education 2022 to ensure that the policies, procedures and training in our school are effective and comply with the law at all times and facilitate a whole school approach to safeguarding.

Our Governors will be subject to an enhanced DBS and section 128 check

All Governors have read and understood Keeping Children Safe in Education 2022. (Part Two of this policy has information on how governors are supported to fulfil their role.)

**Our governing body will ensure that:**

a) Safeguarding policies and procedures

* appropriate policies and procedures are in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare and these are shared with all appropriate persons.
* our safeguarding/child protection policy will reference procedures which are in accordance with government guidance and local safeguarding arrangements; will be updated annually (as a minimum), and be available publicly either via our school website or by other means.
* policies and procedures are followed by all staff.
* appropriate safeguarding responses are in place to children who go missing from education. particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future.
* they are aware that the Data Protection Act and GDPR place a duty on organisations to process personal information fairly and lawfully and keep any information they hold safe and secure.
* all staff hold a current DBS.

# 5. Safeguarding Policies and Procedures/Legal Responsibilities and duty to share information

**Our safeguarding responsibilities include**:

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

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

**Abuse** is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. See section 12 of the CP policy

**Neglect** is a form of abuse and is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Section 12 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

**Children** includes everyone under the age of 18.

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

* The local authority (LA)
* A clinical commissioning group for an area within the LA
* The chief officer of police for a police area in the LA area

**Roles and Responsibilities**

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

All staff

All staff will read and understand part 1 and Annex A of the Department for Education’s statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will be aware of:

* Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identityof the designated safeguarding leads (DSL) the behaviour policy, and the safeguarding response to children who go missing from education
* The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
* The process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play
* What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
* The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child exploitation (CSE/CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

All staff members will undertake safeguarding and child protection training, including online safety training, at induction, together with managing allegations and whistle-blowing procedures, to ensure they understand the school’s safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with local and statutory guidelines.

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

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

Volunteers and Contractors will receive appropriate training, if applicable.

The DSLs

The designated safeguarding lead will take lead responsibility for safeguarding and child protection matters and their role will be made explicit in the job description.

The DSL (and any agreed deputies) will be given the time, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings and to contribute to the assessment of children.

The DSLs will liaise with the local authority and work with other agencies as required. During term time the designated safeguarding leads will always be available (during school hours) for staff in the school to discuss any safeguarding concerns.

The DSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent Awareness training.

Governors

All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

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

Staff who have contact with pupils and families

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

Roles and Responsibilities of Volunteers, Work experience and Students:

A member of the Safeguarding team will explain to volunteers, work experience and students the responsibility of reporting any concerns about children’s safety and welfare to the DSL. Further, they will be briefed on the required policies which include code of conduct, behaviour, safeguarding and child protection and the confidentiality standards that we expect from all in our school.

Therefore, volunteers and students have the responsibility to:

Work within the school’s code of conduct, KCSIE 2022, safeguarding/child protection policy and confidentiality/information sharing expectations; and Immediately share any concerns about a child’s welfare with the DSL.

# 6. Confidentiality

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

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 ina. Timely manner. **It would be legitimate to share information without consent where: it is now possible to gain consent;** it cannot be reasonably expected that a practitioner gains consent; and, if to gain consent would place a child at risk…(KSCIE 2022, PG 31)

Child protection information will be dealt with in a confidential manner, Staff will be informed of relevant details only when the DSL feels that those staff having knowledge of a situation will improve their ability to deal with an individual child and/or family. A written record will be made of what information has been shared with whom, and when. It is made very clear to staff that fears of sharing information must not stand in the way of the need to promote the welfare, and protect the safety of children. Everyone which is in contact with children at St Margaret’s understand that timely information sharing is essential to effective safeguarding and therefore record information in a timely manner (straight away).

Child protection records are stored securely in a central place (CPOMS) separate from academic records. Individual files will be kept for each child: the school will not keep family files. Files will be kept for at least the period which the child is attending the school, and beyond that in line with current data legislation and guidance (see Data Protection policy).

If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk. If staff are in any doubt sharing information, they should speak to the DSL.

# You should note that:

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Description automatically generatedTimely information sharing is essential to effective safeguarding

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Description automatically generatedFears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

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Description automatically generatedIf staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

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Description automatically generatedStaff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests

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Description automatically generatedThe government’s information sharing advice for safeguarding practitioners includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the Designated Safeguarding Lead (or deputy)



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Description automatically generatedConfidentiality is also addressed in this policy with respect to record-keeping in section 10

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_data/file/1062969/Information\_sharing\_advice\_practitioners\_safeguarding\_services.pdf

**7. Communication with parents**

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

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

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

In the case of allegations of abuse made against other children, we will usually notify the parents of all the children involved.

If parents have any concerns about any children they should report these immediately to **Dudley Children’s Services on 0300 555 0050**

**8. Whole Staff Responsibilities**

All Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

Make a referral to Multi Agency Safeguarding Hub (MASH on 0300 555 0050) and/or the police **immediately** if you believe a child is suffering Tell the DSL as soon as possible if you make a referral directly.

Dudley ***Report it*** page: <https://safeguarding.dudley.gov.uk/tell-us/>

If a child discloses a safeguarding issue to you, you should:

* Listen to and believe them. Allow them time to talk freely and do not ask leading questions
* Stay calm and do not show that you are shocked or upset
* Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
* Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
* Write up your conversation a (log onto CPOMS) s soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it

At St Margarets at Hasbury CofE we make it our business to know children and families well. Because of these strong relationships, parents and children feel safe in school and therefore will approach staff for support.

**9. Record keeping**

* We will hold records in line with our records retention schedule.
* All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.
* Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.
* Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.
* If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding & child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information (using the pupil safeguarding form) to enable them to have time to make any necessary preparations to ensure the safety of the child.

St Margaret’s at Hasbury CofE uses an electronic platform to store all safeguarding records. This is password protected. Staff can add information but cannot access information. Only DSLs can access information, this ensures confidentiality. Information is shared through this platform, through meetings or password protected emails.

**Reporting Concerns**

# If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Figure 1 illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children’s Social Care. Referrals should be made by completing a Multi-Agency Referral Form (or MARF) and returning it to [MASH\_Referrals@dudley.gov.uk](mailto:MASH_Referrals@dudley.gov.uk) or contact 0300 555 0050.

Make a referral to Local Authority Children’s Social Care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm or is in immediate danger) Figure 1 illustrates the procedure to follow if you have any concerns about a child’s welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team and/or take advice from Local Authority Children’s Social Care. Referrals should be made by completing a Multi-Agency Referral Form (or MARF) and returning it to [MASH\_Referrals@dudley.gov.uk](mailto:MASH_Referrals@dudley.gov.uk) or contact 0300 555 0050.

To refer into Dudley Exploitation hub (DEx): [CS.Hub@dudley.gov.uk](mailto:CS.Hub@dudley.gov.uk) also complete a MARF. Head of DEx Service: Lorna Nolan

Make a referral to Local Authority Children’s Social Care directly, if appropriate (see ‘Referral’ below). Share any action taken with the DSL as soon as possible.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

**Referral**

If it is appropriate to refer the case to Local Authority Children’s Social Care or the Police, the DSL will make the referral or support you to do so. If you make a referral directly you must tell the DSL as soon as possible.

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

If the child’s situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child’s situation improves.

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

(Note – if the DSL is unavailable, this should not delay action.)



**10. Dudley’s Thresholds and Early Help**

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

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

Level 1 - No referral is required. Professionals should contact Dudley’s Family information Service on 01384 814398 to obtain information about support available for children, young people and families.

Level 2 - Partner agencies should complete their own internal assessment as appropriate and forward this to the relevant Family Centre. Alternatively, an Early Help Assessment can be completed and forwarded to the appropriate Family Centre Cluster.

Level 3 - Referrals should be made by completing an Early Help Assessment and forwarding it to the appropriate Family Centre Cluster.

View more information on [*Dudley Early Help*](https://safeguarding.dudley.gov.uk/safeguarding/child/work-with-children-young-people/dudley-early-help/).

<https://dudleysafeguarding.org.uk/children/professionals-working-with-children/safeguarding-children-procedures/>

**11. When to be concerned**

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 abuse (including harassment and exploitation), domestic abuse in their own intimate relationships** **(teenage relationship abuse),** criminal exploitation, serious youth violence, county lines, and radicalisation.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. **Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse**. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**Signs and Symptoms of Abuse**

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

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

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

**Emotional abuse may involve**:

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

**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 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
* Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

**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 caregivers)
* Ensure access to appropriate medical care or treatment

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

12. Specific Safeguarding Issues

This section is based on the advice in Annex B of Keeping Children Safe in Education – you should adapt it to reflect your local context.

Annex B also includes information on further issues to be aware of, including children’s involvement in the court system, children with family members in prison, and county lines. If you wish to cover these in the policy, consider including:

* An explanation of what the issue is and how your school approaches it (e.g. any preventative measures in place, training you provide for staff)
* What staff should be aware of and actions they should take
* How your school links with external agencies, where relevant

Child on child abuse - Allegations of abuse made against other pupils –

victims should be taken seriously, kept safe and never be made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

We recognise that children can abuse their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of child n child abuse. However, all child on child abuse is unacceptable and will be taken seriously.

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

* Is serious, and potentially a criminal offence
* Could put pupils in the school at risk
* Is violent
* Involves pupils being forced to use drugs or alcohol
* Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including sexting)

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

* You must record the allegation and tell the DSL, but do not investigate it
* The DSL will contact the Local Authority Children’s Social Care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
* The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
* The DSL will contact the Children and Adolescent Mental Health Services (CAMHS), if appropriate

**We will minimise the risk of Child on Child abuse by**:

* Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
* Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
* Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
* Ensuring pupils know they can talk to staff confidentially. Our safeguarding board and delivering of PSHE informs children of this.[insert your procedures for making pupils aware of this here]
* Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

Sexting

**Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

* Whether there is an immediate risk to pupil(s)
* If a referral needs to be made to the police and/or children’s social care
* If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
* What further information is required to decide on the best response
* Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
* Whether immediate action should be taken to delete or remove images from devices or online services
* Any relevant facts about the pupils involved which would influence risk assessment
* If there is a need to contact another school, college, setting or individual
* Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

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

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children’s social care.

**Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

**Informing parents**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through a police community support officer, local neighbourhood police, dialing 101

**Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 10 of this policy also apply to recording incidents of sexting.

**The following document offer additional support:** https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\_da ta/file/896323/UKCIS\_Education\_for\_a\_Connected\_World\_.pdf

Female Genital Mutilation - If you discover that FGM has taken place or a pupil is at risk of FGM

The Department for Education’s Keeping Children Safe in Education explains that FGM comprises *‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.’*

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out discovers that a pupil aged 18 or over appears to have been a victim of FGM] must speak to the DSL and follow our local safeguarding procedures.

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

Honour Based Abuse (including Forced Marriage)

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

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

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

**Forced Marriage**

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

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

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

The DSL will:

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

Child Criminal Exploitation

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

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

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

**Indicators of CCE can include a child**:

* Appearing with unexplained gifts or new possessions
* Associating with other young people involved in exploitation
* Involved in gangs and knife crime
* Suffering from changes in emotional wellbeing
* Misusing drugs and alcohol
* Going missing for periods of time or regularly coming home late
* Regularly missing school or education
* Not taking part in education

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

Child Sexual Exploitation

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

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

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

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

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

* Having an older boyfriend or girlfriend
* Suffering from sexually transmitted infections or becoming pregnant

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

Children Missing from Education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

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

* Are at risk of harm or neglect
* Are at risk of forced marriage or FGM
* Come from Gypsy, Roma, or Traveller families
* Come from the families of service personnel
* Go missing or run away from home or care
* Are supervised by the youth justice system
* Cease to attend a school
* Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child’s name from the admission register at non-standard transition points.

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

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

For further information: Children Missing Education statutory guidance for local authorities 2016 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf>

Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible.

If any pupil has 10 consecutive school days of absence and school have undertaken their own enquiries and it is established that the child is missing from education a referral to the ESS will be made, who will then undertake their own enquiries in trying to establish the child’s whereabouts. The ESS will then agree with school when to remove the pupil/s name from school roll, under Regulation 8 of the Pupil Registration Regulations 2006. The Regulations state that if the child has been continuously absent from school for a period of not less than 20 school days and at no time was his absence authorised, school have no reasonable grounds to believe the pupil is unlikely to attend the school by reason of sickness or any unavoidable cause and both the school and the ESS have failed after reasonable enquiry to ascertain where the pupil is then ESS can agree for the school to remove the pupil from roll.

**Absence Procedures**

If a child is ill the first action to be taken is to call the school as early as possible (and before

9.00am) and let the school office know the child will not be in school – **01384 818660.** Absences can also be reported to[**info@hasbury.dudley.sch.uk**](mailto:info@hasbury.dudley.sch.uk)**.**

This needs to be done **every day** of absence, not just the first day of absence *(unless a child is admitted to hospital, or has a long term illness-related absence for a period of time – in this instance you do not need to ring every day*).

If a child is not in school and we have not had a phone call by 9.00am one of our office staff will call parents/carers to find out why the child is not in school.

Unexplained absence will be unauthorised. However, if a child is absent and evidence from a medical practitioner advising that the period of absence was necessary are provided, the absence for the evidenced period will be authorised.



Homelessness

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

The DSLs will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

Domestic Abuse

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. West Midlands police forces are part of [Operation Encompass](https://www.operationencompass.org/)

The DSL will provide support according to the child’s needs and update records about their circumstances.

Child on Child Sexual Violence and Sexual Harassment

[See Sexual Violence and Sexual Harassment between children in schools and colleges](https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges) and Part Five of KCSiE 2022

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

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

Reports of sexual violence and sexual harassment are likely to be complex and require difficult professional decisions to be made, often quickly and under pressure. Preplanning, effective training and effective policies will provide schools and colleges with the foundation for a calm, considered and appropriate response to any reports.

Ultimately, the school will make any decisions on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required.

Staff working with children are advised to maintain an attitude of **‘it could happen here’** where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the **best interests** of the child.

If staff have **any concerns** about a child’s welfare, they should act on them **immediately.** See page 22 for a flow chart setting out the process for staff when they have concerns about a child.

Up-skirting had been added into Sexual Harassment Section - **The Voyeurism (Offences) Act came into force on 12 April 2019 and has now been referenced**

Radicalisation and Extremism

* **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
* **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
* **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 of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

Staff will be alert to changes in pupils’ behaviour.

The government website [Educate Against Hate](http://educateagainsthate.com/parents/what-are-the-warning-signs/) and charity [NSPCC](https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/protecting-children-from-radicalisation/) say that signs that a pupil is being radicalised can include:

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

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

If staff are concerned about a pupil, they will follow our reporting procedures including discussing their concerns with the DSL.

Staff should **always** act if they are worried.

Further information on the school’s measures to prevent radicalisation are set out in other school policies and procedures.

**If you have concerns about extremism**

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](https://www.gov.uk/government/publications/channel-guidance), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

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

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

* Think someone is in immediate danger
* Think someone may be planning to travel to join an extremist group
* See or hear something that may be terrorist-related

Mental Health - If you have a mental health concern

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.

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action.

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

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



**Areas with particular risk (not exhaustive)**

Safeguarding is not just about protecting children, learners and vulnerable adults from deliberate harm, neglect and failure to act. It relates to broader aspects of care and education, including: **•** Physical intervention

• Personal/Intimate care

• Changing for PE and swimming

• 1:1 working

• Overnight stays

• Boarding schools

• Host families

• Private Fostering

• School dogs/therapy dogs

• Pupils being taught off site

• Elective Home Education (EHE)

• Children persistently absent or have episodes of missing

• Young carers

• Children of parents with mental health issues

• Children and the court system

• Children with family members in prison

**13. LGBT+ pupils**

Some pupils may be vulnerable due to their sexual orientation or gender identity, either because they are subject to homophobic, bi-phobic or transphobic bullying or because of negative responses from parents/carers or others, which may result in increased risk of self-harm, suicide or homelessness.

Several studies also evidence that LGBT+ young people may be at increased risk of becoming victims of CSE.

Schools should therefore ensure that they are aware of the increased risk factors and know how to access appropriate support for these young people when required

**14. 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. Staff should ensure that all children are taught about safeguarding, including online safety. Staff should manage behaviour effectively to ensure a good and safe educational environment. An effective approach to online safety empowers schools to protect and educate the whole school community in their use of technology and establishes mechanisms to identify intervene in and escalate any incident where appropriate.

All children are taught about Online safety termly through our curriculum.

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

* •  Content: being exposed to illegal, inappropriate or harmful content.
* •  Contact: being subjected to harmful online interaction with other users.
* •  Conduct: personal online behaviour that increases the likelihood of, or causes, harm.
* •  Commerce: risks such as online gaming, inappropriate advertising, phishing and or financial scams.

We receive weekly reports from Smoothwall– our filtering system which shares any incidents within the last 7 days. They are rated on severity and allow us to investigate further.

Include the latest searching, screening and confiscation DfE January 2018. <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf>

See also: Teaching Online Safety in schools 2019 <https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf>

**15. Named Designated Person for Children in Care (CiC)**

Designated person should aim to work in partnership with the Virtual School Coordinator on how funding can best support the progress of a CiC

We will ensure that staff have the skills, knowledge and understanding to keep Children in Care and previous Children in Care safe. We will ensure that:

* Appropriate staff have relevant information about Children in Care’s looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
* The DSL has details of children’s social workers and relevant virtual school heads

We have appointed a designated teacher, Louisa Hill, who is responsible for promoting the educational achievement of Children in Care and previous Children in Care in line with [statutory guidance](https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children).

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

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

* Work closely with the DSL to ensure that any safeguarding concerns regarding Children in Care and previous Children in Care are quickly and effectively responded to
* Work with virtual school heads to promote the educational achievement of, Children in Care and previous Children in Care, including discussing how pupil premium plus funding can be best used to support CiC and meet the needs identified in their personal education plans.

**16. Named Virtual Head – Andrew Wright**

[Andrew.wright@dudley.gov.uk](mailto:Andrew.wright@dudley.gov.uk)

**17. Children with Special Educational Needs and Disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration
* Pupils being more prone to peer group isolation than other pupils
* The potential for pupils with SEN and disabilities being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
* Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

**18. Safer Recruitment procedure**

At least 1 person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

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

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

**Advertising**

When advertising roles, we will make clear:

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

**Application forms**

Our application forms will:

* Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
* Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

**Shortlisting**

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

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

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

* Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  + If they have a criminal history
  + Whether they are included on the barred list
  + Whether they are prohibited from teaching
  + Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  + Any relevant overseas information
* Sign a declaration confirming the information they have provided is true

We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

**Seeking references and checking employment history**

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

When seeking references we will:

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

**Interview and selection**

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

**New staff**

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

* Verify their identity
* Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
* Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
* Verify their mental and physical fitness to carry out their work responsibilities
* Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff’s employment and for 2 years afterwards
* Verify their professional qualifications, as appropriate
* Ensure they are not subject to a prohibition order if they are employed to be a teacher
* Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
  + For all staff, including teaching positions: [criminal records checks for overseas applicants](https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants)

For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual’s personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

**Agency and third-party staff**

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

**Contractors**

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

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

**Trainee/student teachers**

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

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

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

**Volunteers**

We will:

* Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
* Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
* Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk
* Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

19. Procedure for dealing with Allegations about Staff - Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Procedure for dealing with complaints and allegations about staff – See Part Four of KCSiE

Schools must work with other agencies to investigate when a member of staff has **“behaved or may have behaved in a way that indicates they may not be suitable to work with children’’**

Further guidance on how schools and colleges should handle allegations against supply staff & volunteers, has been added and handled accordingly.

Allegations about supply teachers will be dealt with in the same way as a school employer in order to ensure allegations are dealt with appropriately. Schools cannot simply cease to use this teacher. This will be managed by the disciplinary procedure and the school should will advise the supply agencies of its process for managing allegations.

Policy should be clear that any concerns about the conduct of other adults in the school should be taken to the Headteacher (NOT to DSL, unless DSL is also the Headteacher)

**Procedure for dealing with complaints and allegations about the headteacher or proprietor**

Concerns about the Headteacher should go to the Chair of Governors. (In proprietor-led independent schools, concerns about the proprietor(s) directly to the local authority Designated Officer (LADO).

**LADO is Yvonne Nelson-Brown**

The policy should be clear about the steps the DSL should take in order to refer a concern outside the school, e.g. a social services enquiry or to LADO.

An up-to-date list of relevant names and contacts details for LADO should be included in the policy.

**The headteacher/chair of governors will then follow the procedures**:

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale.

20. Whistleblowing

If you have a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures – refer to it here.

Alternatively, explain your procedures for raising concerns about the school’s safeguarding practice here. You should consider:

* What areas of malpractice or wrongdoing are covered by the procedures?
* The options available for reporting a concern, including who to approach within the school and externally
* How the school will respond to such concerns
* What protection is available to staff who report another member of staff

Early years providers should also note the requirements set out in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage; you may wish to cover these here if not already covered in a separate policy.

**21. Safeguarding in the Curriculum**

Child Protection and wider child safety issues will be addressed through the curriculum as appropriate, especially in Personal, Social and Health Education (PSHE), Information and Communication Technology (ICT), Citizenship and Sex and Relationships Education, British Values, Online Safety, Radicalisation and Extremism and Assemblies.

22. Visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

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

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

* Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
* The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will always be accompanied by a member of staff. We will not invite into the school any speaker who is known to disseminate extremist views and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

If a child is not collected at the end of the session/day, we will: call contacts and ask the child to be picked up immediately from the school office. A DSL will be called to talk to the adult collecting to ask why the child was not picked up. The incident is logged on CPOMs and all DSLs are alerted to monitor frequency.

**23. Implementation, Review and Monitoring**

Implementation will take place by ensuring this policy is discussed at the full governing body meeting and ensuring all staff have read the policy, by sharing it on TEAMS and in staff meeting.

This Policy will be monitored and reviewed on an annual basis and whenever significant changes to legislation, guidance or changes to local procedures require it. The cover page of this policy states the dates of review ratification by the Governing Body.

Expert and professional organisations are best placed to provide up-to-date guidance and practical support on specific safeguarding issues. For example NSPCC offers information for schools and colleges on its own website www.nspcc.org.uk. Schools can also access DSPP guidance on the issues listed below via the website https://dudleysafeguarding.org.uk/

Useful Numbers

Dudley MASH 0300 555 0050

Emergency Duty Team 0300 555 8574

Local Authority Designated Officer 01394 813110