



## **Safeguarding (Child Protection) Policy**

**This policy is applicable to all pupils including those in  
EYFS - Early Years Foundation Stage**

**REVISED NOVEMBER 2024**

**This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.**

Date written: November 2024

Date of last update: November 2024

Date agreed and ratified by Board/Management committee: November 2024

Date of next full review: November 2025

**This policy will be reviewed at least annually and/or following any updates to national and local guidance and procedures.**

## Key Contacts

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# Authority Contacts

<b>Police Emergency</b>	999		
<b>Fire Emergency</b>	998		
<b>Ambulance Emergency</b>	997		
<b>Child Protection Service</b>	0114778888		
<b>Child Protection Hotline</b>	0114778888		
<b>Ministry of Education</b>	0114753000		
<b>Ministry of Family Affairs</b>	1919		

Note: Publishing authority contacts is not intended to replace, in any way, referral and reporting requirements as per this policy and its procedures.

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# What to do if you have a welfare concern

## Why are you concerned?

For example:

- Something a child has said, for example, an allegation of harm
- Child's appearance; may include unexplained marks/bruises as well as dress
- Behaviour change(s)
- Witnessed concerning behaviour

## Act immediately and record your concerns: If urgent, speak to a DSL first

Follow the school procedure

- Reassure the child
- Clarify any concerns using open questions, if necessary (**TED: Tell, Explain, Describe**)
- Record facts and not opinions and use child's own words. Sign and date your record
- Seek support for yourself as required from DSL

## Inform the school Designated Safeguarding Lead

- DSL completes referral form and reports concern to Principal.
- **If a child is at risk of immediate harm and/or is unsafe to go home**, the Principal informs the Nominated Safeguarding Board member.
- The DSL establishes the appropriate course of action, level of support, monitors implementation and manages the risk assessment:

### Child is judged to be in real and immediate danger

- Appropriate emergency action from police and/or hospital
- Parental contact made if appropriate.

### Safeguarding concern: child may have suffered harm or likely to suffer significant harm

- Action dependent on external services available in country
- Parental contact made if appropriate.

### Child is not suffering or likely to suffer significant harm but may need additional support from an external agency

- Identify appropriate support
- Parental contact made if appropriate.

### No support needed from appropriate emergency services or external agency but external advice sought e.g. MoE

- School considers pastoral support and/or early help assessment accessing services
- Parental contact made if appropriate.

## Record decision making and action taken

## Monitor

Be clear about:

- What you are monitoring, for example, behaviour trends, appearance.
- How long you will monitor
- Where, how and to whom you will feedback, and how you will record

**Review and request further support** if necessary.

### If you are unhappy with the response:

**DSLs/Staff:**  
Follow school's whistleblowing procedures

**Pupils or Parents:**  
Follow school complaints procedures

At all stages, the child's circumstances will be kept under review  
The DSL/staff will request further support if required to ensure the **child's safety** is **paramount**

# 1. Child Focused Approach to Safeguarding

## 1.1 A Strong Culture of Care

Establishing a strong culture of care for our children is our number one priority. This safeguarding policy provides the framework for this to be lived and is divided into three main parts (see visual).

### **WHY – Policy**

Our commitment and guiding principles to safeguarding.

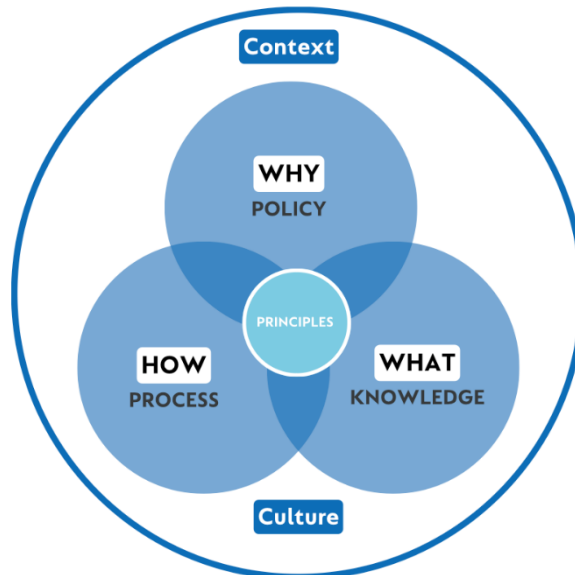
### **WHAT – Knowledge**

The knowledge we need to know to effectively engage with our safeguarding processes.

### **HOW – Process**

The processes required to ensure effective safeguarding in our schools.

Whilst these areas provide the basis for our work, there are two other essential elements to consider: context and culture.



## **Context**

Each school serves a distinctive community. Whilst there are universal principles and processes in safeguarding, an individual school community may also have specific contextual features that impact the safeguarding risks and considerations for children. These will in turn influence a school's approach to the implementation of policy.

## **Culture**

School culture is the collection of values, expectations and practices that guide and inform the work of all members of a school community. Language, actions and behaviours tell you about

the culture in a school. The safeguarding policy is important, but only when actively lived every day in the culture of the school. Safeguarding is a shared responsibility for every member of the school community. Creating a strong safeguarding culture is essential to providing the most effective environment for children to thrive in all aspects of their development.

## 1.2 Introduction

- Downe House Riyadh recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding and promoting the welfare of children is **everybody's** responsibility and everyone has a role to play. All members of our community (staff, volunteers, board members, leaders, parents/carers, wider family networks, and pupils) have an important role in safeguarding children and all have an essential role to play in making our community safe and secure.
- DHR believes that the best interests of children always come first. All children (defined in law and in this policy as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, sex (gender), ability, culture, race, language, religion or sexual identity or orientation, have equal rights to protection.
- Staff working with children at DHR will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- This policy applies where there are any child protection concerns regarding children who attend the school but may also apply to other children connected to the school, for example, siblings, or younger members of staff (under 18s) or children on student/work placements.
- DHR recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- DHR recognises the importance of adopting a trauma informed approach to safeguarding; we understand there is a need to consider the root cause of children's behaviour and consider any underlying trauma.
- Our core safeguarding principles are:
  - **Prevention:** positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
  - **Protection:** following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.



- **Support:** adopt a child centred approach and provide support for all pupils, parents/carers and staff, and where appropriate, implement specific interventions for those who may be at risk of harm.
  - **Collaboration:** with both parents where possible, and other agencies to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including board members, temporary or third-party agency staff and volunteers, and are consistent with those outlined within 'Keeping Children Safe in Education' 2024.

### 1.3. Policy context

- This policy is implemented in accordance with our compliance with the current statutory guidance from the Department for Education, 'Keeping Children Safe in Education' (KCSIE), which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related national and local guidance. This includes but is not limited to:
  - Keeping Children Safe in Education (KCSIE)
  - Working Together to Safeguard Children (WTSC)
  - Early Years and Foundation Stage Framework (EYFS)
  - Ofsted: Education Inspection Framework
  - Framework for the Assessment of Children in Need and their Families, 2000
  - The Education Act 2002
  - Education and Inspections Act 2006
  - The Education (Independent School Standards) Regulations 2014
  - The Non-Maintained Special Schools (England) Regulations 2015
  - The Human Rights Act 1998
  - The Equality Act 2010 (including the Public Sector Equality Duty)
- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- DHR will follow local or national guidance in response to any emergencies. We will amend this policy and our procedures as necessary but regardless of the action required, our safeguarding principles will always remain the same and the welfare of the child is paramount.
- This policy is to be read in the context of the Kingdom of Saudi Arabia and is subject to KSA law, customs, and support systems which shall prevail at all times over the laws, customs, and support systems of any other country.

## 1.4 Definition of safeguarding

- In line with 'Working Together to Safeguard Children' 2023 and KCSIE 2024, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
  - providing help and support to meet the needs of children as soon as problems emerge
  - protecting children from maltreatment, whether that is within or outside the home, including online
  - 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
  - promoting the upbringing of children with their birth parents, or otherwise their family network, whenever possible and where this is in the best interests of the child(ren)
  - taking action to enable all children to have the best outcomes.
- Child protection is part of safeguarding and promoting the welfare of all children and is defined as activity that is undertaken to protect specific children who are suspected to be suffering, or likely to suffer, significant harm. This includes harm that occurs inside or outside the home, including online.
- The school acknowledges that safeguarding includes a wide range of specific issues including, but not limited to:
  - Abuse and neglect
  - Bullying, including cyberbullying
  - Child-on-child abuse
  - Children with family members in prison
  - Children who are absent or missing from education
  - Child missing from home or care
  - Child Sexual Exploitation (CSE)
  - Child Criminal Exploitation (CCE)
  - Contextual safeguarding (risks outside the family home)
  - Domestic abuse
  - Drugs and alcohol misuse
  - Fabricated or induced illness
  - Faith abuse
  - Gender based abuse and violence against women and girls
  - Hate
  - Homelessness
  - Human trafficking and modern slavery
  - Mental health
  - Nude or semi-nude image sharing, also known as youth produced/involved sexual imagery or "Sexting"
  - Online safety
  - Preventing radicalisation and extremism
  - Private fostering
  - Relationship abuse
  - Serious violence
  - Sexual violence and sexual harassment

- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- 'Upskirting'

(Also see Part one and Annex B within 'Keeping Children Safe in Education')

## **1.5 Related safeguarding policies**

- This policy should be read and actioned in conjunction with the policies as listed below:
  - Anti-bullying
  - Attendance
  - Behaviour
  - Complaints
  - Code of Conduct for Staff
  - Conduct of the Work of the Board
  - Data protection
  - Emergency procedures, such as evacuations and lockdowns
  - E-Safety
  - Health and safety
  - First Aid and Sickness
  - Intimate Care
  - IT Laptop User Agreement
  - Lockdown (Part of Emergency Procedures)
  - Managing allegations against staff
  - Missing Child
  - Pastoral
  - Photography and Film
  - Right of Search
  - Risk Assessment
  - Safer recruitment
  - Toilet Training
  - Visitors
  - Whistleblowing

## **Supporting Guidance (to be read and followed alongside this document)**

- Guidance for Safer Working Practice for Adults who Work with Children and Young People in Education Settings
- [What to do if you are worried a child is being abused](#)
- [Early Years Foundation Stage \(EYFS\) Statutory Framework: The Safeguarding and Welfare Requirements](#)
- These documents can be found in / at: DHR SharePoint, All Staff, Policies folder.

## **1.6 Policy compliance, monitoring and review**

- DHR will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part one of KCSIE as appropriate. This can be found on the school website.
- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request. Additionally, our policies can be viewed via the school website.
- The policy forms part of our school development plan and will be reviewed annually by the Board of Directors /leadership who has responsibility for oversight of safeguarding and child protection systems.
- The Designated Safeguarding Lead DSL and Headteacher will ensure regular reporting on safeguarding activity and systems to the Board of Directors /leadership. The Board of Directors /leadership will not receive details of individual pupil situations or identifying features of families as part of their oversight responsibility.

## **2. Key Responsibilities**

### **Safeguarding principles**

Principle 1: Everyone has a responsibility to support the protection of children.

### **Essential points**

- Everyone is responsible for safeguarding
- Some staff have specific responsibilities
- There is a difference between being responsible and accountable for safeguarding

### **2.1 All Staff**

- Contribute to providing a safe environment in which all children can learn and flourish.
- Know what constitutes abuse and what to do if a child tells you that he or she is being abused, harmed or neglected.
- Know what to do if you are concerned about the behaviour or conduct of an adult in the school.
- Manage the requirement to maintain an appropriate level of confidentiality.
- Refer any concern to the Designated Safeguarding Lead (DSL) or the Deputy DSL (DDSL) or in their absence the EduReach Safeguarding Lead (ESL)
- Refer any safeguarding concern about the Principal to the Chair of the Board.
- Be aware of our child protection process and your role in it.
- Read and understand this policy including all key factual awareness documents.
- Our staff play a particularly important role in safeguarding as they are in a position to observe changes in a child's behaviour or appearance, identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating.
- All members of staff have a responsibility to:
  - provide a safe environment in which children can learn.

- be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
  - know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact this can have upon a child.
  - be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - be prepared to identify children who may benefit from early help and understand the early help process and their role in it.
  - understand the school safeguarding policies and systems.
  - undertake regular and appropriate training which is regularly updated.
  - know how to maintain an appropriate level of confidentiality.
  - reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - act in line with Teachers' Standards 2012 which state that teachers (including headteachers) should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.
- Staff at DHR recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as being abusive or harmful. This should not prevent staff from having professional curiosity and speaking to a DSL if they have any concerns about a child.
  - Staff at DHR will determine how best to build trusted relationships with children, young people and parents/carers which facilitate appropriate professional communication in line with existing and relevant policies, for example, our staff behaviour and pupil behaviour policies.

The **Designated Safeguarding Lead (DSL)** is the key person in school responsible for leading and managing the safeguarding of children. They must have the authority in school to make key decisions.

The **Principal** at each school, is accountable for the standards of safeguarding and child protection at their school.

The **EduReach Safeguarding Lead (ESL)** is responsible for promoting the highest standard of safeguarding and child protection, advising and supporting schools to adopt a self-improving approach to safeguarding practice and the effective implementation of policies and practices across all schools.

The **Chair of the Board**.

## 2.2 Governance and leadership

- The Board of Directors and leadership team have a strategic responsibility for our safeguarding arrangements and will comply with their duties under legislation. The Board of Directors /leadership have regard to the KCSIE guidance and will ensure our policies, procedures and training is effective and complies with the law at all times.
- The Board of Directors /leadership will facilitate a whole school approach to safeguarding which involves everyone. They will ensure that safeguarding and child protection are at the

forefront and underpin all relevant aspects of process and policy development, so that all systems, processes, and policies operate with the best interests of the child at their heart.

- The Board of Directors /leadership are aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements set out by the KSA.
  - This includes but is not limited to safeguarding all members of the school community (for example, staff, pupils, parents/carers and other family members) identified with protected characteristics within the Equality Act; age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex, sexual orientation.
  - For further information about our approaches to equality, diversity, and inclusion, please access our school's Equal Opportunities Policy (See the school website).
- The Board of Directors /leadership and leadership team will ensure that there are policies and procedures in place to ensure appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- The Headteacher will ensure that our child protection and safeguarding policies and procedures adopted by the Board of Directors /leadership, are understood, and followed by all staff.
- The Board of Directors /leadership will ensure an appropriate senior member of staff, from the school leadership team, is appointed to the role of designated safeguarding lead (DSL). The Board of Directors and leadership team will ensure that the DSL is supported in their role and is provided with sufficient time so they can provide appropriate support to staff and children regarding any safeguarding and welfare concerns.
- The Board of Directors has nominated one of its senior board level members to take leadership responsibility for the school's safeguarding arrangements on behalf of the Board and to liaise with external agencies where this is required, including in the event of allegations of abuse made against the Principal or a member of the Board. Contact details are set out in the key school contacts list at the front of this policy.

## **2.2 Designated Safeguarding Lead (DSL)**

- The school has appointed Nina Tank, Deputy Head Pastoral, a member of the senior leadership team, to act as our Designated Safeguarding Lead (DSL).
- The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including online safety and understanding the filtering and monitoring systems and processes in place) in school.
- The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:
  - Naomi Egan, Head of Primary and Nouf Al Eidan Deputy Head Operations
- Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

- The DSL (and any deputies) will be more likely to have a complete safeguarding picture and will be the most appropriate person to advise staff on the response to any safeguarding concerns.
- It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE. This includes but is not limited to:
  - Acting as the central contact point for all staff to discuss any safeguarding concerns.
  - Maintaining a confidential recording system for safeguarding and child protection concerns.
  - Coordinating safeguarding action for individual children.
  - Liaising with other agencies and professionals in line with KCSIE and WTSC.
  - Ensuring that locally established procedures as put in place including referrals, are followed, as necessary.
  - Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection meetings or conferences).
  - Managing and monitoring the school role in any multi-agency plan for a child.
  - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
  - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and any out of hours and/or out of term activities.
  - Taking lead responsibility for online safety, including understanding the filtering and monitoring systems and processes in place.
  - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, are experiencing, or have experienced, with teachers and school leadership staff.
  - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
  - Liaising with the Headteacher to inform them of any safeguarding issues, especially ongoing enquiries and police investigations. This includes being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
  - Have a working knowledge of the local customs and legislation that are implemented within KSA.
  - Provide a termly and an annual report for the school board, detailing any changes and reviews of relevant policy and procedures including the Single Central Record, training undertaken by the Designated Safeguarding Lead and by all staff and Board members; number and type of incidents/cases including any trends, and any required actions or involvement by the board.
- The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated at least annually through a variety of methods at regular intervals.

## **Availability**

During term time the DSL (or a deputy) will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst the DSL (or deputy) will normally

be available in person, the Principal will define what 'available' means and whether in exceptional circumstances availability is via work phone and/or Microsoft Teams. It is the responsibility of the Principal and DSL to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

## **2.4 Children and young people**

- Children and young people have a right to:
  - Feel safe, be listened to, and have their wishes and feelings taken into account.
  - Confidently report abuse, neglect or exploitation, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
  - Contribute to the development of school safeguarding policies.
  - Receive help from a trusted adult.
  - Learn how to keep themselves safe, including online.

## **2.5 Parents and carers**

- Parents/carers have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures.
  - Talk to their children about safeguarding issues and support the school in their safeguarding approaches.
  - Identify behaviours which could indicate that their child is at risk of harm, including online.
  - Seek help and support from the school or other agencies.

## **2.6 School nurse**

- School nurses have a responsibility to:
  - Understand and adhere to the relevant school policies and procedures.
  - Be aware of the indicators of abuse, neglect and exploitation so that they can identify cases of children who may need help or protection.
  - Know what to do if a child tells them that they are being abused, neglected, or exploited and understand the impact this can have upon a child.
  - Undertake regular and appropriate training which is regularly updated.
  - Know how to maintain an appropriate level of confidentiality.
  - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.
  - Support the work of the Designated Safeguarding Lead and attend regular safeguarding meetings of the Safeguarding Team.

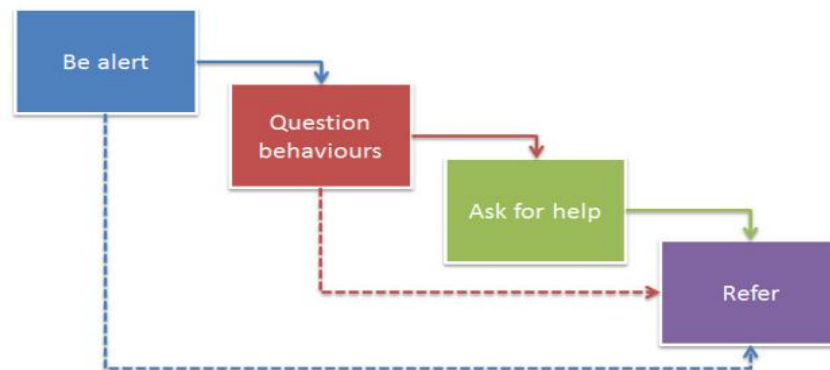
# **3. Child Protection Procedures**

## **3.1 Recognising indicators of abuse, neglect and exploitation**

- Staff will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child.



- All staff are made aware of the definitions and indicators of abuse, neglect and exploitation as identified by 'Working Together to Safeguard Children' and 'Keeping Children Safe in Education'.
- DHR recognises that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse (for more in-depth information, see appendix 1):
  - Physical abuse
  - Sexual abuse
  - Emotional abuse
  - Neglect
- By understanding the indicators of abuse, neglect and exploitation, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow the below approach if they are concerned about a child:



['What to do if you are worried a child is being abused'](#)

- DHR recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse, neglect and exploitation can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse, neglect and exploitation do not automatically mean a child is being harmed, however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.

DHR recognises abuse, neglect, exploitation and other safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.

- Parental behaviors can indicate child abuse, neglect or exploitation; so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- Children may report abuse, neglect or exploitation happening to themselves, their peers, or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the school. Children can be at risk of abuse, neglect 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, sexual abuse, serious youth violence and county lines.
- recognises that technology can be a significant component in many safeguarding and wellbeing issues; children are at risk of abuse or exploitation online from people they know (including other children) and from people they do not know; in many cases, abuse will take place concurrently via online channels and in daily life.
- DHR recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- Following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including any electronic devices, will be managed in line with the school Behaviour Policy.
  - The DSL (or deputy) will be informed of any searching incidents where there were reasonable grounds to suspect a pupil was in possession of a prohibited item as listed in our behaviour policy. The DSL (or deputy) will then consider the circumstances of the pupil who has been searched to assess the incident against any potential wider safeguarding concerns.
  - Staff will involve the DSL (or deputy) without delay if they believe that a search has revealed a safeguarding risk.

### **3.2 Responding to child protection concerns**

A cause for concern should include the following content:

1. Precise and accurate factual notes (including date and time of incident and full names of those involved) made as soon as possible after an observation or disclosure
  2. Quotations of actual words used by the child, shown as direct speech
  3. If necessary, an attached body map
  4. A reminder to give or notify the DSL of the incident immediately
  5. Confirmation of who to notify of the incident
- If staff are concerned about the safety or welfare of a child, they are expected to:
    - listen carefully to the child, reflecting back the concern without displaying shock or disbelief.
    - remain calm.
    - use the child's language.
    - be non-judgmental and accept what is being said without challenge.
    - do not offer opinion, criticise or lay blame.

- avoid leading questions; only prompting the child where necessary with open questions to clarify information where necessary. For example, who, what, where, when or Tell, Explain, Describe (TED).
  - not promise confidentiality as concerns will have to be shared further, for example, with the DSL.
  - be clear about boundaries and how the report will be progressed.
  - do not ask to see any injuries. However, should the child choose to show you the injury make a note of where on the body these injuries are by using the Body Map (see Appendix)
  - if you can, write brief notes of what they are telling you, while they are speaking. These may help later if you must remember exactly what was said. Keep your original notes, however rough they are. It is what you wrote at the time that may be important later, not a tidier and improved version you wrote up afterwards. If you do not have the means to write at the time, make notes of what was said as soon as possible afterwards.
  - inform the DSL (or deputy), as soon as practically possible. Do not attempt to investigate the concerns yourself.
  - Report the concerns using CPOMS
- All staff are made aware that early information sharing is vital for the effective identification, assessment, and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to other agencies. Staff will not assume a colleague, or another professional will act and share information that might be critical in keeping children safe.
  - 'Early help' is defined in 'Working together to safeguard children' as support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. It is not an individual service, but a system of support delivered by local partners, including education providers, working together and taking collective responsibility to provide the right provision in their area.
    - If early help support is appropriate, the DSL (or a deputy) will lead on exploring internal resources available and liaising with other universal or additional services available via local agencies.
    - Staff, including the DSL, may be required to work with other agencies and professionals in an early help assessment.
  - Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, intensive or specialist support is required and a 'request for support' will be made immediately to appropriate local services and/or the police.
  - The DSL, or a deputy DSL in the absence of the DSL will have the overall responsibility for making referrals.
  - If staff have any concerns about a child's welfare, they are expected to act on them immediately. If staff are unsure if something is a safeguarding issue, they will speak to the DSL (or deputy). If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken by staff.

- DSLs and staff will be mindful of the need for the school to ensure any activity or support implemented to support children and/or families is recorded. Support provided by the school where families are struggling will be overseen and reviewed by the DSL on a regular basis to ensure activity does not obscure potential safeguarding concerns from the wider professional network.
- If a parent makes a disclosure to school then the DSL:
  - should meet with the parent taking down all details;
  - will assure the parent that the school will take the matter seriously;
  - that he/she will have to take advice from the Principal about the disclosure; and
  - will get back to the parent when a decision has been taken and how to proceed.

### **3.3 Recording concerns**

- Records will be completed as soon as possible after the incident/event, using the child's words and uploaded onto CPOMS by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if visible injuries to a child have been observed. Staff recording disclosures should use the specific words that the child used (e.g., if referring to parts of their body), indicating these by using "speech marks/inverted commas".
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority. If the DSL is not available then this should not delay appropriate action being taken and staff should speak to the DDSL, Principal or, failing that, another member of the SLT/Nominated Safeguarding Board Member.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Principals must be made aware of any situation, prior to a referral being made by the DSL or DDSL to any external agency/emergency services.
- If a child discloses physical abuse, self-harms or attempts to take their life, staff should never take photos of the child's injuries.
- Child protection records are kept confidential and stored securely on CPOMS. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible; within 5 days for an in-year transfer or within the first 5 days of the start of a new term. Child protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.

- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files from another setting, the DSL will ensure key staff such as the Special Educational Needs Co-ordinators (SENCOs), will be made aware of relevant information as required.
- Where a pupil joins the school and no child protection files are received, the DSL will proactively seek to confirm from the previous setting whether any child protections exist for the pupil, and if so, if the files have been sent.

### **3.4 Escalation outside of our school**

If a child is being harmed or is at significant risk of harm:

When a child is thought to be at risk of harm or is likely to be at risk of harm, after full consideration, a referral should be made to the Child Protection Centre, or the Police if a criminal act is thought to have occurred. The referral will be made by the DSL (Child Protection Centre) or the Principal (Police) with translation support as necessary, after approval.

The ESL is required to approve all Child Protection Centre referrals. The Chair of the Board is required to approve all Police referrals. The school does **not** require parental consent for referrals to be made to the authorities. Consent to do this must **not** be obtained from the parents if to gain consent would put the child's safety at risk or to do so could jeopardise any investigation by partner agencies. See above re ensuring that a context is gathered prior to making any referral to external agencies.

If a child has unmet needs:

When a child is not considered at risk of harm, but still has unmet needs that could mean they require Early Help intervention, a referral may still be needed to the Child Protection Centre in some instances. These concerns should be discussed with the parents and any subsequent referral made transparently with the parent's knowledge unless to do so would place the child at heightened risk.

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

- DHR recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity.
- Where reasonably possible, the school will hold more than one emergency contact number for each pupil. There is an expectation that emergency contact information will be held for both parents, unless doing so would put a child at risk of harm, for example a court or other legal order preventing access is in place. If this is the case, it should be recorded on the children safeguarding file. The school should be proactive in being inclusive of fathers; effective father engagement should be the expectation from the

outset and is important to help the school understand the child's significant relationships and lived experiences.

- The Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) places duties on schools and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure. The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.
  - All staff will be provided with training and information to ensure they have due regard to the relevant data protection principles, which allow them to share and/or withhold personal information.
- The Headteacher and DSL will disclose relevant safeguarding information about a pupil with staff on a 'need to know' basis.
- All members of staff must be aware that they have a professional responsibility to be 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; this may include sharing information with the DSL.
- In regard to confidentiality and information sharing, staff will only involve those who need to be involved, such as the DSL (or a deputy). All staff are aware they cannot promise a child that they will not tell anyone about a report of any form of abuse, as this may not be in the best interests of the child.
- We will always aim to share our intention to contact the AMAN in suspected criminal cases with the child's parents unless to do so could put the child at greater risk of harm or impede a criminal investigation.
- Whilst it is always important to take into consideration the wishes and feelings of a child, staff should never guarantee confidentiality to pupils or adults wishing to tell them about something serious, as this may ultimately not be in the best interests of the child. They should guarantee that they will not tell anyone who does not have a clear need to know and that they will pass on information in confidence only to the people who must be told in order to ensure their safety.

### **3.6 Passing on safeguarding records when a child leaves the school**

Information sharing is vital in identifying and tackling all forms of abuse.

If we have concerns about a child's safety, we have a duty to notify the relevant authorities. However, we should not share safeguarding information with a new school, until we have notified the authorities and obtained guidance from the authorities on whether we can share the safeguarding information with the new school. We should also carefully consider the information shared with the new school and take advice from the EduReach Safeguarding Lead before doing so.

Upon approval from the authorities, we may need to share the safeguarding information with the new school. However, the child's place at the new school should be confirmed and the child should be enrolled at the school before the information is shared.

### **3.7 Safeguarding allegations/concerns raised in relation to staff, including supply teachers, volunteers and contractors**

#### **a. Expectations of adults**

The safety and wellbeing of children in our school is dependent on the vigilance of all our staff. Their prompt communication to the DSL, DDSL or Principal of any concerns, no matter how small, regarding the conduct by an adult which causes them to doubt that adult's suitability to work with or have access to children is paramount.

All references in this section to "adult" should be interpreted as meaning any adult, staff members, agency/supply staff, self-employed, contractors, volunteers and visitors, unless otherwise stated. The school is conscious of its duty of care to children and will always act. This includes the possibility of abuse arising from situations or persons outside the school setting if alerted to this.

The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported. Adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.

All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our 'Staff Code of Conduct.'

Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people. All members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. A position of trust could arise even if the member of staff does not teach the child.

- All school staff, including any staff working at the school who are employed through an agency, should adopt safe working practices when working with children:
  - Avoid one-to-one situations where possible
  - Be visible if you are in the situation where you are working alone with children (let someone know where you are, who you are with and why, and for how long)
  - Avoid unnecessary physical contact
  - Ensure all contact during lessons is appropriate, visible and in context
  - Adopt discretion with distressed children

- Maintain appropriate communication with children both in and out of School
- Staff must not have children as 'friends' via any social media or social networking site.

## **Allegations**

- If such an allegation is made directly by a child/adult/parent to a member of staff, the member of staff receiving the allegation will immediately inform the Designated Safeguarding Lead.
- Any concerns or allegations about staff will be recorded and dealt with appropriately. In depth information can be found within our 'Allegations Policy', 'Disciplinary procedures' and/or Staff code of conduct for Staff policy. These can be found in the School shared area under 'Policies' .
- The Designated Safeguarding Lead will then investigate the allegations to establish:
  - Who made the allegation
  - The nature of the allegation
  - Where and when the alleged incident took place
  - Who was involved
  - Whether there were any witnesses
- The DSL will establish if the allegation may meet the harms threshold and it is alleged that anyone in the school including Board members and volunteers, has:
  - behaved in a way that has harmed a child, or may have harmed a child and/or;
  - possibly committed a criminal offence against or related to a child and/or;
  - behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.

(KCSIE)

- All allegations made against members of staff will be reported to the Principal.
- The member of staff against whom the allegations have been made, may be suspended (with pay) pending investigation, by the Principal, in order to protect all parties involved.
- If the outcome of the investigation establishes that abuse has occurred, due to failure to meet applicable professional standards, the member of staff involved shall be dealt with through the School's Disciplinary Procedure.
- If the allegation made to a member of staff concerns the Principal, the person receiving the allegation will immediately inform the Chair of the Board who will then investigate the allegations.
- In the event of an allegation against the Principal, any decision to suspend will be made by the Chair of the Board.



- If an allegation is made against a Board member, the person receiving the allegation will immediately inform the Nominated Safeguarding Board Member. If the allegation is against the Nominated Safeguarding Board Member, then the person receiving the allegation will immediately inform the Chair of the Board.
- Allegations that are thought to be 'low-level', e.g. any concern no matter how small, should be shared responsibly and with the right person, and recorded and dealt with appropriately. Low-level concerns can arise in several ways from various sources, e.g., suspicion, complaint or a disclosure.
- Low-level concerns regarding a member of staff should be shared with the DSL confidentially unless the concern is about the DSL, in which case it should be shared with the Principal. The Principal should be the ultimate decision-maker in respect of all low-level concerns, although they may wish to consult the DSL to take a more collaborative approach. The Chair of the Board should be contacted if the low-level concern is about the Principal.
- The school recognises its duty of care to members of staff who are subject to an allegation and the stress that an investigation is likely to cause. Therefore, every effort will be made to minimise the stress and disruption an allegation could cause and advice and support will be offered to the member of staff as appropriate.
- Any records of allegations that are found to be false will be removed from personnel records. However, for all other allegations, the following records will be 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.
- In all cases where allegations are made against staff or low-level concerns are reported, once proceedings have been concluded, the Headteacher will consider the facts and determine whether any lessons can be learned and if any improvements can be made.
- In the situation that the school receives an allegation relating to an incident that happened when an individual or organisation was using our premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), we will follow our safeguarding policies and procedures.

### **Concerns that pose a risk of harm (harm threshold)**

- DHR recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they

continue to work in their present position, or in any capacity with children in the school. This includes when someone 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
  - behaved or may have behaved in a way that indicates they may not be suitable to work with children.
- Allegations against staff which meet this threshold will be responded to and managed in line with Part four of KCSIE. Allegations that meet the harm threshold will be referred immediately to the Headteacher who will contact the Board of Directors to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the Headteacher, staff are advised that allegations should be reported to the Board of Directors.

## **D. Whistleblowing**

You should use the whistleblowing policy when you suspect wrongdoing.

Wrongdoing may include:

- actions which endanger the Health and Safety of others or the environment
- concerns about poor or unsafe practice, including in relation to the care and protection of a pupil or pupils
- conduct which suggests extremism or radicalisation of other staff or pupils
- allegations against adults
- bribery or corruption
- criminal activity
- fraud or other financial irregularities
- failure to comply with any legal or professional obligation or regulatory requirements
- conduct likely to damage the reputation of the School/Cognita
- misuse of sensitive or confidential information
- miscarriages of justice
- breaches of our internal policies and procedures
- any activity or situation within the School/Cognita or anywhere in our supply chain which amounts to modern slavery and
- deliberate attempts to conceal any of the above.

Staff are strongly encouraged to reach out at an early stage.

No member of staff will be disciplined or otherwise suffer any detriment from the school for raising a genuine concern about unsafe practice, if they do so in good faith and follow the whistleblowing procedures.

## **Concerns that do not meet the 'harm threshold'**

### **Low-Level Concerns, including self-reports**

#### **What is a low-level concern, including those that are self-reports?**

The term 'low-level' concern does not mean that it is insignificant. 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 not in line with the code of conduct.

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.

- From time to time an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued. Equally, an individual may for whatever reason have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct, falls below the expected professional standards, or breaches this policy. Self-reporting in these circumstances is encouraged as it demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived. As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.
- DHR may also need to take action in response to 'low-level' concerns about staff. DHR has an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately; this enables us to identify inappropriate, problematic or concerning behaviour early, minimise the risk of abuse and ensure that adults working in or on behalf of the school are clear about and act within appropriate professional boundaries, and in accordance with our ethos and values.
  - A 'low-level' concern does not mean that it is insignificant; a low-level concern is any concern that an adult working in or on behalf of the school may have acted in a way that is inconsistent with our staff code of conduct, including inappropriate conduct outside of work and does not meet the 'harm threshold'.
  - Low-level concerns may arise in several ways and from a number of sources. For example, suspicion, complaints, or allegations made by a child, parent or other adult within or outside of the organisation, or as a result of vetting checks.
  - A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or '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 DSL.
- Examples of such behaviour could include, but are not limited to:
  - being over friendly with children;
  - having favourites;
  - 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 all low-level concerns are shared responsibly, recorded and dealt with appropriately to protect staff from becoming the subject of potential false low-level concerns or misunderstandings.
- Staff are required to report any concerns about any adult (including a person employed by a supply agency or a contractor) to the Principal (or nominated deputy). Where the concern relates to the Principal, it should be reported to the Chair of the Board. Such reports should be made without undue delay. Staff do not need to be able to determine whether their concern is a low-level concern or whether it meets the threshold of an allegation. This determination will be made by the Principal/Chair of the Board when the matter has been investigated.
- A member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff, for whatever reason, may have behaved in a manner which, on reflection, falls short of the standard set out in the Staff Code of Conduct. Under such circumstances, the member of staff should make a self-report to the Principal as soon as possible. Doing so demonstrates transparency, facilitates effective management of the issue and can reduce the risks of misunderstandings and false allegations.
- The Principal will go about investigating low-level concerns by collecting as much evidence including CCTV footage or information from a device, as possible by speaking directly to the person who raised the concern, the individual involved and to any witnesses.
- All low-level concerns, including those determined to be unfounded, will be recorded in writing by the Principal. The record will include details of the concern, the context in which the concern arose, and any actions taken, decisions reached and the eventual outcome. The name of the individual sharing their concerns will be noted. If the individual wishes to remain anonymous, then this will be respected as far as reasonably possible. Records of low-level concerns are confidential and securely stored by the DSL in accordance with the school's Data Policy and the [name of country] Data Protection Act.
- No record will be made of the concern on the individual's personnel file unless either:
  - the concern (or group of concerns) has been reclassified as an allegation; or
  - the concern (or group of concerns) is sufficiently serious to result in formal action under the school's grievance, capability or disciplinary procedure.

Low Level concerns should not be included in references unless they relate to issues which would normally be included in a reference, for example, misconduct or poor performance. However, where a low-level concern (or group of concerns) has met the allegations threshold for referral to the Designated Officer and found to be substantiated, it should be referred to in a reference.

### **Low- Level Concerns about an adult**

From time to time, an individual may notice behaviour, statements or actions in others which leave them concerned. These are behaviours or actions which fall short of a formal allegation of abuse.

These tend to be behaviours which indicate that our Code of Conduct has not been met. Any such concerns can be dealt with as a low-level concern.

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

- being over friendly with children;
- having favourites;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door;
- using inappropriate sexualised, intimidating behaviour (including shouting or being verbally aggressive); and/or
- offensive language (including the belittling of children on their own or in front of peers).

**What to do if you have a low-level concern?**

Where a low-level concern exists, it should be reported to the DSL or Principal within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

## Self-reporting

From time to time, an individual may find him/herself in a situation which might appear compromising to others or which could be misconstrued.

Equally, an individual may, for whatever reason, have behaved in a manner which on reflection he/she considers falls below the standard set out in the Code of Conduct/other Cognita policy, falls below the expected professional standards or breaches this policy. Self-reporting in these circumstances is encouraged. This demonstrates both awareness of the expected behavioural standards and self-awareness as to the individual's own actions or how they could be perceived.

As such, the school sees self-reporting as an important means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

### **What to do if you have a self-report?**

Where a self-report exists, it should be reported to the DSL or to the Principal within 24 hours. Such report will be treated confidentiality to the extent possible and only disclosed, whether internally or externally, on a need to know basis.

### **3.6 Complaints**

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, pupils and members of staff and visitors who wish to report concerns or complaints. This can be found on the school website and the school intranet.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse in education can contact The Child Protection Hotline: 0114778888
- Staff can also raise concerns regarding child protection failures internally (Whistleblowing policy).
- The leadership team at DHR will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

## **4. Specific Safeguarding Issues**

- DHR is aware of the range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part one, DSLs, school leaders and staff who work directly with children will read Annex B of KCSIE which contains important additional information about the following specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

### **4.1 Child-on-child abuse**

- All members of staff at DHR recognise that children can abuse other children; this is known as child-on-child abuse and can happen both inside and outside of school and online.
- DHR recognises that child-on-child abuse can take many forms, including but not limited to:
  - Bullying, including cyberbullying, prejudice-based and discriminatory bullying
  - Abuse in intimate personal relationships between children
  - Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm
  - Sexual violence and sexual harassment
  - Consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
  - Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party

- Upskirting (which is a criminal offence), 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
- Initiation/hazing type violence and rituals
- Any allegations of child-on-child abuse will be recorded, investigated, and dealt with in line with this child protection policy and KCSIE (in particular, part two and five).
- DHR adopts a zero-tolerance approach to child-on-child abuse. We believe that abuse is abuse and it will never be tolerated or dismissed as "just banter", "just having a laugh", "part of growing up" or "boys being boys"; this can lead to a culture of unacceptable behaviours and can create an unsafe environment for children and a culture that normalises abuse, which can prevent children from coming forward to report it.
- All staff have a role to play in challenging inappropriate behaviours between children. Staff recognise that some child-on-child abuse issues may be affected by gender, age, ability and culture of those involved. For example, for gender-based abuse, girls are more likely to be victims and boys more likely to be perpetrators.
- DHR recognises that even if there are no reported cases of child-on-child abuse, such abuse is still likely to be taking place and it may be the case that it is just not being reported. As such, it is important that staff speak to the DSL (or deputy) about any concerns regarding child-on-child abuse.
- In order to minimise the risk of child-on-child abuse, DHR will:
  - Robust anti-bullying policy
  - Providing an age/ability appropriate PSHE curriculum
  - A range of reporting mechanisms – CPOMs
  - Themed Assemblies
  - Circle Time
- DHR want children to feel able to confidently report abuse and know their concerns will be treated seriously. All allegations of child-on-child abuse will be reported to the DSL and will be recorded, investigated, and dealt with in line with associated school policies, including child protection, anti-bullying, and behaviour. Pupils who experience abuse will be offered appropriate support, regardless of where the abuse takes place.
- Concerns about pupils' behaviour, including child-on-child abuse taking place offsite will be responded to as part of a partnership approach with pupils and parents/carers. Offsite behaviour concerns will be recorded and responded to in line with existing appropriate policies, for example anti-bullying, acceptable use, behaviour and child protection policies.
- Alleged victims, alleged perpetrators and any other child affected by child-on-child abuse will be supported by:
  - Listening carefully
  - Avoiding victim blaming
  - Providing appropriate pastoral support
  - Working with parents/carers
  - Reviewing educational approaches



- Following procedures in our anti-bullying, behaviour and child protection policy, and where necessary and appropriate, informing the police

## 4.2 Child-on-child sexual violence and sexual harassment

- When responding to concerns relating to child-on-child sexual violence or harassment DHR will follow the guidance outlined in Part Five of KCSIE.
- DHR recognises that sexual violence and sexual abuse can happen anywhere, and all staff will maintain an attitude of 'it could happen here.' DHR recognises sexual violence and sexual harassment can occur between two children of any age and sex. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children and can occur online and face to face (both physically and verbally). Sexual violence and sexual harassment is never acceptable.
- **All** victims of sexual violence or sexual harassment will be 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. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment, or ever be made to feel ashamed for making a report.
- Abuse that occurs online or outside of the school will not be dismissed or downplayed and will be treated equally seriously and in line with relevant policies/procedures, for example anti-bullying, behaviour, child protection, online safety.
- DHR recognises that the law is in place to protect children and young people rather than criminalise them, and this will be explained in such a way to pupils that avoids alarming or distressing them.
- DHR recognises that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory, so children may not be able to recall all details or timeline of abuse. All staff will be aware certain children may face additional barriers to telling someone, for example because of their vulnerability, disability, sex, ethnicity, and/or sexual orientation.
- The DSL (or deputy) is likely to have a complete safeguarding picture and will be the most appropriate person to advise on the initial response.
  - The DSL will make an immediate risk and needs assessment which will be considered on a case-by-case basis which explores how best to support and protect the victim and the alleged perpetrator, and any other children involved/impacted, in line with part five of KCSIE and relevant local guidance and support.
  - The risk and needs assessment will be recorded and kept under review and will consider the victim (especially their protection and support), the alleged perpetrator, and all other children, adults and staff and any actions that are required to protect them.
  - Any concerns involving an online element will take place in accordance with relevant local guidance and advice.
- Reports will initially be managed internally by the school and where necessary will be referred to local services (if appropriate) and/or the police. Important considerations which may influence this decision include:

- the wishes of the victim in terms of how they want to proceed.
  - the nature of the alleged incident(s), including whether a crime may have been committed and/or whether Harmful Sexual Behaviour has been displayed.
  - the ages of the children involved.
  - the developmental stages of the children involved.
  - any power imbalance between the children.
  - if the alleged incident is a one-off or a sustained pattern of abuse - sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature.
  - that sexual violence and sexual harassment can take place within intimate personal relationships between children.
  - understanding intra familial harms and any necessary support for siblings following incidents.
  - whether there are any ongoing risks to the victim, other children, adult students, or school staff.
  - any other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.
- The school will in most instances engage with both the victim's and alleged perpetrator's parents/carers when there has been a report of sexual violence; this might not be necessary or proportionate in the case of sexual harassment and will depend on a case-by-case basis. The exception to this is if there is a reason to believe informing a parent/carer will put a child at additional risk. Any information shared with parents/carers will be in line with information sharing expectations, our confidentiality policy, and any data protection requirements, and where they are involved, will be subject to discussion with other agencies (for example a local agency and/or the police) to ensure a consistent approach is taken.

### **4.3 Nude and/or semi-nude image sharing by children**

The term 'sharing nudes and semi-nudes' is used to mean the sending or posting of nude or semi-nude images, videos or live streams of/by young people under the age of eighteen. Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents complex. The [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people' guidance](#) outlines how schools and colleges should respond to all incidents of consensual and non-consensual image sharing; it should be read and understood by all DSLs working with all age groups

- DHR recognises that consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as youth produced/involved sexual imagery or "sexting") can be a safeguarding issue; all concerns will be reported to and dealt with by the DSL (or deputy).
- When made aware of concerns involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos by children, staff are advised:
  - to report any concerns to the DSL immediately.
  - never to view, copy, print, share, forward, store or save the imagery, or ask a child to share or download it – this may be illegal. If staff have already inadvertently viewed imagery, this will be immediately reported to the DSL.
  - not to delete the imagery or ask the child to delete it.

- to avoid saying or doing anything to blame or shame any children involved.
  - to reassure the child(ren) involved and explain that the DSL will be informed so they can receive appropriate support and help. Do not promise confidentiality, as other agencies may need to be informed and be involved.
  - not to investigate or ask the child(ren) involved to disclose information regarding the imagery
  - to not share information about the incident with other members of staff, children/young people, or parents/carers, including the families and child(ren) involved in the incident; this is the responsibility of the DSL.
- DSLs will respond to concerns in line with the non-statutory UKCIS guidance: '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)' and the local [KSCMP](#) guidance. When made aware of a concern involving consensual and non-consensual sharing of nudes and semi-nude images and/or videos:
    - The DSL will hold an initial review meeting to explore the context and ensure appropriate and proportionate safeguarding action is taken in the best interests of any child involved. This may mean speaking with relevant staff and the children involved as appropriate.
    - Parents/carers will be informed at an early stage and be involved in the process to best support children, unless there is good reason to believe that involving them would put a child at risk of harm.
    - All decisions and action taken will be recorded in line with our child protection procedures.
    - A referral will be made to the police immediately if:
      - the incident involves an adult (over 18).
      - there is reason to believe that a child has been coerced, blackmailed, or groomed, or there are concerns about their capacity to consent, for example, age of the child or they have special educational needs.
      - the image/videos involve sexual acts and a child under the age of thirteen, depict sexual acts which are unusual for the child's developmental stage, or are violent.
      - a child is at immediate risk of harm owing to the sharing of nudes and semi-nudes.
    - The DSL may choose to involve other agencies at any time if further information/concerns are disclosed at a later date.

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

- DHR recognises that both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. 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.
- DHR recognises that children can become trapped in CCE as perpetrators can threaten victims and their families with violence or entrap and coerce them into debt. Children involved in criminal exploitation often commit crimes themselves which can mean their vulnerability as victims is not always recognised (particularly older children) and they are not treated as victims, despite the harm they have experienced. The experience of girls

who are criminally exploited can also be very different to that of boys. We also recognise that boys and girls being criminally exploited may be at higher risk of child sexual exploitation (CSE).

- DHR recognises that CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge, for example 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 and includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited, for example they may believe they are in a genuine romantic relationship.
- If staff are concerned that a child may be at risk of CSE or CCE, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.5 Serious violence**

- All staff are aware of the indicators which may signal children are at risk from or are involved with serious violent crime. These may include unexplained gifts or new possessions, 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 and may be at risk of CCE.
- Any concerns regarding serious violence will be reported and responded to in line with other child protection concerns by speaking with a DSL or deputy. The initial response to child victims is important and staff will take any allegations seriously and work in ways that support children and keep them safe.

#### **4.6 Modern Slavery**

- 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 Statutory Guidance: [Modern slavery: how to identify and support victims](#).
- If there are concerns that any member of the community is a victim or involved with modern slavery, concerns should be shared with a DSL or deputy and will be responded to in line with this policy.

#### **4.7 So-called Honour Based Abuse (HBA)**

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

- All forms of HBA are abuse, regardless of the motivation, and concerns will be responded to in line with section 3 of this policy. Staff will report any concerns about HBA to the DSL (or a deputy). If there is an immediate threat, the police will be contacted.
- All staff will speak to the DSL (or deputy) if they have any concerns about forced marriage.
- Whilst all staff will speak to the DSL (or deputy) if they have any concerns about FGM, there is a specific reporting duty on teachers.
  - Unless the teacher has good reason not to, they are expected to discuss any FGM concerns with the DSL (or a deputy).

#### **4.8 Preventing radicalisation**

- DHR recognises that children may be susceptible to radicalisation into terrorism.
- Protecting children from the risk of radicalisation is part of the school's wider safeguarding duties, and is similar in nature to protecting children from other harms (e.g. drugs, gangs, neglect, sexual exploitation), whether these come from within their family or are the product of outside influences.
- There is no single way of identifying an individual who is likely to be susceptible to a terrorist ideology. As with managing 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. Children at risk of radicalisation may display different signs or seek to hide their views. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately.

Example indicators of radicalisation or that an individual is engaged with an extremist group, cause or ideology include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to any illegal organisations or other extremist groups
- Out of character changes in dress, behaviour, and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, artwork or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-[name of country] views or anti-Western
- Advocating violence towards others.
- Communications with others that suggest identification with a group/cause/ideology.

## 4.9 Cybercrime

- DHR recognises that children with particular skills and interests in computing and technology may inadvertently or deliberately stray into 'cyber-enabled' (crimes that can happen offline but are enabled at scale and at speed online) or 'cyber dependent' (crimes that can be committed only by using a computer/internet enabled device) cybercrime.
- If staff are concerned that a child may be at risk of becoming involved in cyber-dependent cybercrime, the DSL or a deputy will be informed, and consideration will be given to accessing local support and/or referring into the [Cyber Choices](#) programme, which aims to intervene when 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.
- Where there are concerns about 'cyber-enabled' crime such as fraud, purchasing of illegal drugs online, child sexual abuse and exploitation, or other areas of concern such as online bullying or general online safety, they will be responded to in line with the child protection policy and other appropriate policies.

## 4.10 Domestic abuse

- DHR recognises that:
  - domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents.
  - domestic abuse can include, but is not limited to, psychological (including coercive control), physical, sexual, economic, or emotional abuse.
  - children can be victims of domestic abuse if they see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse).
  - anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background, and domestic abuse can take place inside or outside of the home.
  - domestic abuse can take place within different types of relationships, including ex-partners and family members.
  - there is always a potential for domestic abuse to take place when parents/families separate, or for existing domestic abuse to persist or escalate post separation.
  - domestic abuse can have a detrimental and long-term impact on children's health, well-being, development, and ability to learn.
  - domestic abuse concerns will not be looked at in isolation and our response will be considered as part of a holistic approach which takes into account children's lived experiences.
  - it is important not to use victim blaming language and to adopt a trauma informed approach when responding to concerns relating to domestic abuse.
- If staff are concerned that a child may be at risk of seeing, hearing, or experiencing the effects of any form of domestic abuse, or in their own intimate relationships, immediate action should be taken by speaking to the DSL or a deputy.

#### **4.11 Mental health**

- All staff recognise 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.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic Adverse Childhood Experiences (ACEs), can impact on their mental health, behaviour, and education.
- Staff 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.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy.

### **5 Supporting Children Potentially at Greater Risk of Harm**

- Whilst **all** children should be protected, DHR acknowledge that some groups of children are potentially at greater risk of harm. This can include the following groups.

#### **5.1 Safeguarding children with Special Educational Needs or Disabilities (SEND)**

- DHR acknowledges that children with special educational needs or disabilities (SEND) or certain health conditions can face additional safeguarding challenges and barriers for recognising abuse, neglect or exploitation.
- DHR recognises that children with SEND may face additional communication barriers and experience difficulties in managing or reporting abuse or challenges. Children with SEND will be supported to communicate and ensure that their voice is heard and acted upon.
- All members of staff are encouraged to appropriately explore potential indicators of abuse, neglect and exploitation, such as behaviour, mood changes or injuries and not to assume that they are related to the child's disability. Staff will be mindful that children with SEND, or certain medical conditions may be disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Members of staff are encouraged to be aware that children with SEND can be disproportionately impacted by safeguarding concerns, such as exploitation, peer group isolation or bullying including prejudice-based bullying.
- To address these additional challenges, our school will always consider implementing extra pastoral support and attention for children with SEND. The DSL will work closely with the SENCO to plan support as required.

- Our school has a robust Intimate Care policy and Toilet Training policy which ensures that the health, safety, independence, and welfare of children is promoted, and their dignity and privacy are respected.

## 5.2 Children requiring mental health support

- DHR has an important role to play in supporting the mental health and wellbeing of our pupils. 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.
- Where there are concerns regarding possible mental health problems for pupils, staff should:
  - Record these on CPOMs
  - Speak to the DLS
  - Make a referral to the school counsellor
- Age/ability appropriate education will be provided to our pupils to help promote positive health, wellbeing, and resilience.
  - **PSHE and circle time**
  - Wellbeing material shared with students and parents
  - Themed assemblies
  - DHR DNA
  - Pastoral support via Form tutors / HOYs DHP
  - Study skills support in Secondary

## 5.3 Children who are absent from education

- Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation.
- A robust response to children who are absent from education for prolonged periods and/or on repeat occasions will support the identification of such abuse and may help prevent the risk of children going missing in the future.
- Where possible, the school will hold more than one emergency contact number for each pupil, so we have additional options to make contact with a responsible adult if a child missing education is also identified as a welfare and/or safeguarding concern (see section 3.5).
- Where the school has concerns that a child has unexplainable and/or persistent absences from education and/or is missing from education, we will respond in line with our Attendance Policy.



## 5.4 Children who may benefit from Early Help

- Any child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:
  - is disabled or has certain health conditions and has specific additional needs
  - has special educational needs (whether or not they have a statutory Education, Health and Care plan)
  - has a mental health need
  - is a young carer
  - is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
  - is frequently missing/goes missing from education, home or care,
  - has experienced multiple suspensions, is at risk of being permanently excluded from school
  - is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
  - is at risk of being radicalised or exploited
  - has a parent or carer in custody, or is affected by parental offending
  - is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
  - is misusing alcohol and other drugs themselves
  - is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
  - is a privately fostered child.
- Where it is identified a child may need early help, staff and DSLs will respond in line with section 3 of this policy.

## 5.5 Children who are privately fostered

- Private fostering occurs when a child under the age of 16 (under 18 for children with a disability) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.

## 6 Online (E-) Safety

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. DHR will adopt a whole school approach to online safety which will empower, protect, and educate our pupils and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.

- DHR will ensure online safety is considered as a running and interrelated theme when devising and implementing our policies and procedures, and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- DHR identifies that the breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful content. For example, pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
  - Contact: being subjected to harmful online interaction with other users. For example, peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (including consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
  - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.
- DHR recognises that technology and the risks and harms related to it evolve and change rapidly. The school will carry out an annual review of our approaches to online safety, supported by an annual risk assessment, which considers and reflects the current risks our children face online.
- The Headteacher will be informed of any online safety concerns by the DSL, as appropriate. The named governor for safeguarding/ Headteacher will report on online safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

## **6.1 Policies and procedures**

- The DSL has overall responsibility for online safety within the school but will liaise with other members of staff, for example IT technicians and curriculum leads as necessary.
- The DSL will respond to online safety concerns in line with our child protection and other associated policies, including our Anti-bullying policy, Photography and Film policy (including social media) and behaviour policies.
  - Internal sanctions and/or support will be implemented as appropriate.
  - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- DHR uses a wide range of technology. This includes: computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
  - All school owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.

- DHR recognises that generative artificial intelligence (AI) tools may have many uses which could benefit our school community. However, it is important to recognise that AI tools can also pose risks; this is including, but not limited to, bullying and harassment, abuse and exploitation (including child sexual abuse), privacy and data protection risks, plagiarism and cheating, and inaccurate, harmful and/or biased material, and additionally its use can pose moral, ethical and legal concerns.
  - Staff and pupils will be made aware of the benefits and risks of using AI tools; through specific lessons, staff training etc.
  - Staff are required to carry out a risk assessment and seek written approval from the senior leadership team prior to any use of AI in school.
  - DHR will respond to any misuse of AI in line with relevant policies, including but not limited to, anti-bullying, behaviour and child protection.
  - Where the DHR believe that AI tools may have facilitated the creation of child sexual abuse material, including the sharing of nude/semi-nude images by children, the school will respond in line with the UKCIS guidance '[Sharing nudes and semi-nudes: advice for education settings working with children and young people](#)'.
- DHR recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras, wearable technology and any other electronic devices with imaging and/or sharing capabilities. In accordance with KCSIE and EYFS:
  - DHR has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community.
  - staff must not take images of pupils using personal mobile devices;
  - all staff should only use school owned mobile devices and cameras in accordance with the guidance set out in the Staff Code of Conduct;
  - parents of all pupils may bring mobile devices onto the premises but may only take photographs during events such as plays, concerts or sporting events for personal use. Parents should be reminded that the publication of such images (including on personal social networking sites even where access to the image may be limited) may be unlawful.

## **6.2 Appropriate filtering and monitoring on school/college devices and networks**

DHR follow the guidance set out by the [UK Safer Internet Centre](#) and [filtering and monitoring standards](#) where appropriate. In accordance with these guidelines:

- identify and assign roles and responsibilities to manage filtering and monitoring systems.
  - review filtering and monitoring provision at least annually
  - block harmful and inappropriate content without unreasonably impacting teaching and learning
  - have effective monitoring strategies in place that meet their safeguarding needs.
- DHR will do all we reasonably can to limit children's exposure to online harms through school provided devices and networks and in line with the requirements of the Prevent Duty and KCSIE, we will ensure that appropriate filtering and monitoring systems are in place.

- When implementing appropriate filtering and monitoring, DHR will ensure that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.
- Whilst filtering and monitoring is an important part of our online safety responsibilities, it is only one part of our approach to online safety and we recognise that we cannot rely on filtering and monitoring alone to safeguard our pupils; effective safeguarding practice, robust policies, appropriate classroom/behaviour management and regular education/training about safe and responsible use is essential and expected.
  - Pupils will use appropriate search tools, apps and online resources as identified by staff, following an informed risk assessment.
  - Internet use will be supervised by staff as appropriate to pupils’ age, ability and potential risk of harm:
    - KS1 and 2, pupils will be directly supervised by a member of staff, students identified as being at potentially greater risk of harm will always be directly supervised by an adult.
    - Use of software devices to enable teachers to view and monitor screens.

### **6.2.1 Responsibilities**

- Our Board of Directors /Senior Leadership has overall strategic responsibility for our filtering and monitoring approaches, including ensuring that our filtering and monitoring systems are regularly reviewed, and that the leadership team and relevant staff have an awareness and understanding of the appropriate filtering and monitoring provisions in place, manage them effectively and know how to escalate concerns when identified.
- DSL and Headteacher and, designated Safeguarding Board member, are responsible for ensuring that our school has met the DfE [Filtering and monitoring standards](#) for schools and colleges.
- Our senior leadership team are responsible for
  - procuring filtering and monitoring systems.
  - documenting decisions on what is blocked or allowed and why.
  - reviewing the effectiveness of our provision.
  - overseeing reports.
  - ensuring that all staff understand their role, are appropriately trained, follow policies, processes and procedures and act on reports and concerns.
  - ensuring the DSL and IT department have sufficient time and support to manage their filtering and monitoring responsibilities.
- The DSL has lead responsibility for overseeing and acting on:
  - any filtering and monitoring reports.
  - any child protection or safeguarding concerns identified.
  - checks to filtering and monitoring system.
- The IT department have technical responsibility for:
  - maintaining filtering and monitoring systems.
  - providing filtering and monitoring reports.

- completing technical actions identified following any concerns or checks to systems.
- working with the senior leadership team and DSL to procure systems, identify risks, carry out reviews and carry out checks.
- All members of staff are provided with an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring as part of our induction process, and in our child protection staff training.
- All staff, pupils and parents/carers have a responsibility to follow this policy to report and record any filtering or monitoring concerns.

## 6.2.2 Decision making and reviewing our filtering and monitoring provision

Decisions made in relation to the implementation of appropriate filtering and monitoring should be recorded for reference and be available to those entitled to inspect that information. Decisions made by school leaders will need to consider the proportionality of costs versus safeguarding risks for their specific context

- When procuring and/or making decisions about our filtering and monitoring provision, our senior leadership team works closely with the DSL and the IT department. Decisions have been recorded and informed by an approach which ensures our systems meet our school specific needs and circumstances, including but not limited to our pupil risk profile and specific technology use.
- Any changes to the filtering and monitoring approaches will be assessed by staff with safeguarding, educational and technical experience and, where appropriate, with consent from the leadership team; all changes to the filtering policy are logged and recorded.
- Our school undertakes an at least annual review of our filtering and monitoring systems to ensure we understand the changing needs and potential risks posed to our community.

A formal review of your filtering and monitoring systems should be done as a minimum annually, and revisited if a safeguarding risk is identified, if there is a change in working practice (such as remote access or 'Bring Your Own Device' (BYOD)), or any new technology use is introduced. The review should be conducted by members of the senior leadership team, the DSL, and IT staff/IT service provider and involve the governor with responsibility for safeguarding. The results should be recorded for reference and made available to those entitled to inspect that information. Please access the DfE [filtering and monitoring standards](#) for further advice and information

- In addition, our school undertakes regular checks on our filtering and monitoring systems, which are logged and recorded, to ensure our approaches are effective and can provide assurance to the Board of Directors/Senior Leadership that we are meeting our safeguarding obligations.
  - These checks are achieved by:
    - Follow KCSIE signposts as appropriate **Test Filtering**
    - Termly checks being undertaken by a DSL, checks are undertaken with two members of staff the DSL and a member of IT department checks are undertaken in a location where confidentiality can be achieved, during working hours, when pupils are not present

- checks are undertaken on a range of devices/accounts to test different filtering policies
- checks are logged/recorded, any technical concerns are flagged to the IT staff/IT service provider and safeguarding concerns are actioned by the DSL etc.in line with this policy

### 6.2.3 Appropriate filtering

- DHR's education broadband connectivity is provided through STC and DHR uses SONICWALL.
  - STC is a member of [Internet Watch Foundation](#) (IWF).
  - SONICWALL as signed up to Counter-Terrorism Internet Referral Unit list (CTIRU)
  - SONICWALL is blocking access to illegal content including child sexual abuse material (CSAM).
  - SONICWALL blocks access to sites which could promote or include harmful and/or inappropriate behaviour or material. This includes content which promotes discrimination or extremism, drugs/substance misuse, malware/hacking, gambling, piracy, pro-self-harm, eating disorder and/or suicide content, pornographic content and violent material.
- We filter internet use on all school owned, or provided, internet enabled devices and networks. This is achieved by:
  - Using a firewall called SONICWALL
  - SONICWALL provides specific filtering approaches required for mobile devices such as tablets and eReaders, and any guest access to systems such as Wi-Fi
- Our filtering system is operational, up to date and is applied to all users, including guest accounts, all school owned devices and networks, and all devices using the school broadband connection.
- We work with STC and SONICWALL and our IT department to ensure that our filtering policy is continually reviewed to reflect our needs and requirements.
- If there is failure in the software or abuse of the system, for example if pupils or staff accidentally or deliberately access, witness or suspect unsuitable material has been accessed, they are required to:
  - turn off monitor/screen, use a screen cover widget, report the concern immediately to a member of staff, report the URL of the site to technical staff/services.
- Filtering breaches will be reported to the DSL and technical staff and will be recorded and escalated as appropriate and in line with relevant policies, including our child protection, acceptable use, allegations against staff and behaviour policies.
- Parents/carers will be informed of filtering breaches involving their child.
- Any access to material believed to indicate a risk of significant harm, or that could be illegal, will be reported as soon as it is identified to the appropriate agencies, including but

not limited to the [Internet Watch Foundation](#) (where there are concerns about child sexual abuse material).

- If staff are teaching topics which could create unusual activity on the filtering logs, or if staff perceive there to be unreasonable restrictions affecting teaching, learning or administration, they will report this to the DSL and/or leadership team.

#### **6.2.4 Appropriate monitoring**

- We will appropriately monitor internet use on all school provided devices and networks. This is achieved by:
  - monitoring internet and web access (restricted logfile information)
  - pro-active technology monitoring services - ATIVION
  - In class monitoring of screen
- All users will be informed that use of our devices and networks can/will be monitored and that all monitoring is in line with data protection, human rights and privacy legislation.
- If a concern is identified via our monitoring approaches:
  - Where the concern relates to pupils, it will be reported to the DSL and will be recorded and responded to in line with relevant policies, such as child protection, acceptable use, and behaviour policies.
  - Where the concern relates to staff, it will be reported to the headteacher (or chair of governors if the concern relates to the headteacher), in line with our staff allegations policy.
- Where our monitoring approaches detect any immediate risk of harm or illegal activity, this will be reported as soon as possible to the DSL and Principal.

#### **6.3 Information security and access management**

- DHR is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and pupils. Further information can be found in acceptable use policies and online safety policy.
- DHR will review the effectiveness of our procedures periodically to keep up with evolving cyber-crime technologies.
- DSL, a member of the senior leadership team and Safeguarding board of governor, are responsible for ensuring that our school has meet the DfE [cyber security standards](#) for schools and colleges.

#### **6.4 Remote/Online learning**

- DfE: [Safeguarding and remote education during coronavirus \(COVID-19\)](#)
- NSPCC: [Undertaking remote teaching safely](#)

- DHR will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements and any local/national guidance.
- All communication with pupils and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and agreed systems: Microsoft 365 and Seesaw
  - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and pupils will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy/code of conduct and Acceptable Use Policies.
- Staff and pupils will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP)/ Distance Learning Policy.

## **6.5 Online Safety Training for Staff**

- DHR will ensure that all staff receive online safety training, which, amongst other things, will include providing them with an understanding of the expectations, applicable roles and their responsibilities in relation to filtering and monitoring, as part of induction.
- Ongoing online safety training and updates for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach. See section 7 for more information.

## **6.6 Educating pupils**

- DHR will ensure a comprehensive whole school curriculum response is in place to enable all pupils to learn about and manage online risks effectively as part of providing a broad and balanced curriculum. See section 9 for more information.

## **6.7 Working with parents/carers**

- DHR will build a partnership approach to online safety and will support parents/carers to become aware and alert of the potential benefits and risks and to reinforce the importance of children being safe online by:
  - Providing information on our school website and through existing communication channels (such as official social media, newsletters).
- DHR will ensure parents and carers understand what systems are used to filter and monitor their children's online use at school, what their children are being asked to do



online, including the sites they will be asked to access and who from the school (if anyone) their child is going to be interacting with online. This is achieved by:

- For example, providing information on our school website and relevant policies such as acceptable use, home/school agreements.
- Where the school is made aware of any potentially harmful risks, challenges and/or hoaxes circulating online, national or locally, we will respond in line with the DfE '[Harmful online challenges and online hoaxes](#)' guidance to ensure we adopt a proportional and helpful response. Additional local advice is available for DSLs and SLT via the Education Safeguarding Service blog post: [Think before you scare](#)'

## **7 Staff Engagement and Expectations**

### **7.1 Staff awareness, induction and training**

- All members of staff have been provided with a copy of Part one of the current version of 'Keeping Children Safe in Education' which covers safeguarding information for staff.
  - School leaders, including the DSL and Board of Directors will read KCSIE in its entirety.
  - School leaders and all members of staff who work directly with children will read annex B of KCSIE.
  - All members of staff have signed to confirm that they have read and understood the national guidance shared with them. List how and where this information is kept, for example, the school single central record and a copy with the DSL.
- It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents. All staff are expected to re-read this policy at least annually (and following any updates) to ensure they understand our expectations and requirements.
- All new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including online safety, which, amongst other things, will include ensuring an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) to ensure they are aware of the school internal safeguarding processes, as part of their induction. In the form of specific training from the DSL, and assigned EduCare online safety courses.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including online safety) that is updated at least annually, to ensure they are aware of a range of safeguarding issues and how to report concerns, through annual inset/twilight training.
- Online safety training for staff will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning, through specific online safety training, annual updates.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, via email, e-bulletins, staff meetings.

DHR recognises the expertise staff build by undertaking safeguarding training and from managing safeguarding concerns on a daily basis, and staff are encouraged to contribute to and shape school safeguarding arrangements and child protection policies, for example via input from knowledgeable and experienced staff, inviting input at staff meetings.

- All Board of Directors receive appropriate safeguarding and child protection (including online safety) training at induction. This training equips them with the knowledge to provide strategic challenge to be assured that our safeguarding policies and procedures are effective and support the delivery of a robust whole school approach to safeguarding. This training is regularly updated, for example, annual updates, or refresher training every two years.
- The DSL and Headteacher will provide an annual report to the Board of Directors /leadership detailing safeguarding training undertaken by all staff and will maintain an up-to-date record of who has been trained.

## **7.2 Safer working practice**

- Our school takes steps as outlined in this and other relevant policies to ensure processes are in place for staff that promote continuous vigilance, maintain an environment that deters and prevents abuse and challenges inappropriate behaviour.
- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school code of conduct.
- The DSL will ensure that all staff (including contractors) and volunteers are aware of the school expectations regarding safe and professional practice via the staff code of conduct and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Any physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures, and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff behaviour policy, mobile and smart technology, Acceptable Use Policies (AUPs), and social media.

## **7.3 Supervision and support**

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS).

- The school will provide appropriate supervision and support for all members of staff to ensure that:
  - All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
  - All staff are supported by the DSL in their safeguarding role.
  - All members of staff have regular reviews of their own practice to ensure they improve over time.
- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- For those support staff for whom English is an additional language or who require support to access the written policy, the school will provide additional training to ensure all staff are familiar with the policy and guidance.
- Additionally, the school will make an assessment of the appropriate level and focus for staff training and responsiveness to specific safeguarding concerns such as radicalisation, harmful sexual behaviour, child sexual exploitation, female genital mutilation, cyberbullying and mental health and will ensure that appropriate staff have the skills, knowledge and understanding to keep looked after children safe.

## **8 Safer Recruitment and Allegations Against Staff**

### **8.1 Safer recruitment and safeguarding checks**

- DHR is committed to ensure that we develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff. We recognise that we must ensure that people working with children in our setting are suitable, have the relevant qualifications/training and have passed any required checks to fulfil their roles. See the school's separate Safer Recruitment Policy.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- All staff, Board members and volunteers are under an ongoing duty to inform the school if their circumstances change which would mean they meet any of the criteria for disqualification under the UK's Childcare Act 2006. Staff should refer to the school's Safer Recruitment Policy for further information about this duty and to their contract of employment in respect of their ongoing duty to update the school.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, reprimands, and warnings.
- Where the school places a pupil with an alternative provision provider (e.g. a shadow teacher), we continue to be responsible for the safeguarding of that pupil and will need to satisfy ourselves that the provider can meet the needs of the pupil.
  - DHR will obtain written confirmation from the alternative provision provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e., those checks that our school/college would otherwise perform in respect of our own staff.

- Where the school organises work experience placements, we will follow the advice and guidance as identified in Part three of KCSIE.
- Where the school organises homestays as part of exchange visits, we will follow the advice and guidance as identified in Part three and Annex E of KCSIE.
- The school's protocol for ensuring that visiting speakers are suitable and appropriately supervised is set out in the school's separate Visitors and Security Policy.

### **8.3 Safe Culture**

- As part of our approach to safeguarding, the school has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- The safety and wellbeing of children in our school is dependent on the vigilance of all our staff and their prompt communication to the DSL or Principal of any concerns, no matter how small, about any conduct by an adult which causes you to doubt that adult's suitability to work with or have access to children. All references in this section to "adult" should be interpreted as meaning any adult staff members, agency staff, contractors, and visitors, unless otherwise stated. The school is conscious of its duty of care to pupils and will always act, including if alerted to the possibility of abuse arising from situations or persons outside the school setting.
- The notification and prompt handling of all concerns about adults, including those raised by individuals about themselves, is fundamental to safeguarding children. It helps to identify and prevent abuse and to protect adults against misunderstandings or misinterpretations. It also encourages openness, trust and transparency and it clarifies expected behaviours. Those raising concerns or reporting allegations in good faith will always be supported, and adults in respect of whom concerns or allegations have been raised will not suffer any detriment unless the concern or allegation is found to be substantiated.
- All staff must behave responsibly and professionally in all dealings with children and specifically with pupils for whom they have a duty of care. All staff must follow the procedures set out in our Staff Code of Conduct and our Acceptable Use Policy. Staff should always avoid behaviour which might be misinterpreted by others. As a result of their knowledge, position and/or the authority invested in their role, all adults working with children and young people are in positions of trust in relation to the young people in their care. A relationship between a member of staff and a pupil cannot be a relationship between equals. There is potential for exploitation and harm of vulnerable young people and all members of staff have a responsibility to ensure that an unequal balance of power is not used for personal advantage or gratification. Staff should note that it is an offence for a person aged 18 or over and in a position of trust to touch a child in a sexual way or have a sexual relationship with a child, even if the relationship is consensual. A position of trust could arise even if the member of staff does not teach the child.

- Staff are encouraged and should feel confident to self-refer, if they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards. This includes where concerns may be felt to be deliberately invented or malicious; such allegations are extremely rare and as such all concerns should be reported and recorded.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at DHR will take all concerns or allegations received seriously.
- All members of staff are made aware of the school Whistleblowing procedure. It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.

## **9 Opportunities to Teach Safeguarding**

- Aspects of safeguarding are taught through the curriculum and PSHE programme, including guidance on adjusting behaviour to reduce risks, both online and in a social or day to day context, building resilience to protect themselves and their peers, fostering healthy and respectful relationships with others and providing information about who they should turn to for help.
- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe,' to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that pupils have a range of age-appropriate contacts and strategies to ensure their own protection and that of others.
- Pupils are taught about harmful sexual behaviours, including sexual violence and sexual harassment, through PSHE education appropriate to their age and stage of development.
- DHR has a clear set of values and standards, upheld, and demonstrated throughout all aspects of school life which are underpinned by our behaviour policy and pastoral support system, as well as timetabled lessons and reinforcement throughout the whole curriculum. Our programme is fully inclusive and developed to be age and stage of development appropriate.
- DHR recognise that a one size fits all approach will not be appropriate for all children, and a more personalised or contextualised approach, tailored to the specific needs and vulnerabilities of individual children might be needed, for example children who are victims of abuse, neglect or exploitation, and children with SEND.
- Pupils are given the opportunity to talk about safeguarding issues within the classroom environment and are made aware of the processes by which any concerns they have can

be raised including the processes for reporting a concern about a friend or peer, and how any report will be handled.

- The safe use of technology is a focus in all areas of the curriculum and key ICT safety messages are reinforced across the PSHE programme. The school has appropriate filters and monitoring systems in place (see the acceptable use and ICT policies) and is mindful that this should not lead to unnecessary restrictions on learning.
- We recognise that the school plays a significant part in the prevention of harm to children by providing our children with good lines of communication with trusted adults, supportive friends, healthy relationships and an ethos of protection. The school community will therefore:
  - Establish and maintain an ethos where children feel secure and are encouraged to talk and feel that they are always 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
  - Include across the curriculum, including and particularly within Personal, Social and Health Education, will provide age-appropriate opportunities that will equip children with the skills they need to stay safe from harm and to know to whom they should turn for help
  - Work with parents and carers to ensure children continue to learn and develop.

## 10 Physical Safety

### 10.1 Use of 'reasonable force'

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our Behaviour policy

### 10.2 The use of school premises by other organisations

The guidance on [Keeping children safe in out-of-school settings](#) details the safeguarding arrangements that schools and colleges should expect these providers to have in place.

- Where our school facilities or premises are rented/hired out to organisations or individuals (for example to community groups, sports associations, and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.
  - Where those services or activities are provided under the direct supervision or management of our school staff, our existing arrangements for child protection, including this policy, will apply.
  - Where services or activities are provided separately by another body using the school facilities/premises, the Headteacher and Board of Directors /leadership will seek assurance that the provider 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 for the provider to liaise with the school on these matters where appropriate. If this assurance is not achieved, an application to use premises will be refused.

- The school has a duty to ensure that appropriate arrangements are in place to keep children safe when allowing outside organisations to use their facilities. If the activity is being run by the school, or overseen by the school, then this policy and the school's procedures apply.
- If not, then the school should seek assurance that the body concerned has appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). Should the organisation wishing to use the school premises not have any safeguarding policies or procedures in place, then the organisation should not be allowed to let the facilities. The school 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.

### 10.3 Site security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to sign in and out via the office visitors log and to display a visitor's badge whilst on site. See Visitor's Policy
- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

## 11 Local Support

- All members of staff in DHR are made aware of local support available.

## 12 Policy History

No	Date	Section / Paragraph	Revision	Remarks
1	12/6/17	1.1	Update Introduction	
2	12/6/17	1.4	Lead Agency	
3	12/6/17	1.7	Aims of Policy	
4	12/6/17	2.2	Staff Safeguarding Training	
5	12/6/17	2.4	5 Out Comes for Every Child Matters & Procedures	
6	12/6/17	4.1	Supporting Children	
7	12/6/17	5.4	Staff Confidentiality	
8	12/6/17	6.2	Supporting Staff	
9	12/6/17	7.4	Dealing with Disclosure of Abuse Procedure	
10	12/6/17	8.1	Allegations Against Staff	
11	12/6/17	10.2	Use of Cameras	
12	12/6/17	11	Prevention – Healthy Relationships	
13	12/6/17	12	Prevention of Extremism	
14	12/6/17	13	School Mission Statement & Values	
15	12/6/17	Page 22	Physical Neglect	Appendix One
16	12/6/17	Page 23	Sexual Abuse	Appendix One Child Sexual Exploitation
17	12/6/17	Page 25	Dealing with a Disclosure – Process Flowchart	Appendix Two
18	12/6/17	Pages 26,27	Safeguarding & Referral Form	Appendix Three
19	12/6/17	Pages 28,29	Body Map	Appendix Four
20	30/8/18	1.3 Page 5	Introduction	Keeping Children Safe in Education (updated to Sept 2018)
21	01/10/18	1.3, Page 5	Introduction	Working Together to Safeguard Children (updated to July 2018)
22	8/10/18	1.3, Page 5	Introduction	Children's Wellbeing Report - GL Assessment;



				PASS - (2018).
23	15/08/20		Whole Policy	Key School Contacts – updated  4.3, 5.3, 11.1 - Revised to reflect updates to the KCSIE with effect from 1 <sup>st</sup> September 2020.
24	21/2/2021	21,22,23	Update to confidential referral form	Appendix 3
25	7/6/2021	2.5	KCSIE	Updated to January 2021
26	01/08/2021		KCSIE updates, from September 2021	Full policy revision in light of KCSIE 2021 update
27	31/07/2022	All sections	KCSIE updates, from September 2022  Revisions and updates to other sections including Safeguarding Meetings	Full policy revision in light of KCSIE 2022 update.
28	13/08/2023	Sections 3,5,6,7,12,16,17,28,35, Appendix 2, Appendix 5	KCSIE updates for September 2023  Revisions and updates to other sections including introduction of Low-Level Concerns policy.	Full policy revision in light of KCSIE 2023 update.
29	9/8/2024	All sections	Whole policy including KCSIE updates for September 2024	Full policy revision in light of KCSIE 2024 update.

# Appendix 1: Categories of Abuse

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

**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. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and 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 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 acts of sexual abuse, as can other children.

## **Signs that MAY INDICATE Sexual Abuse**

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour, for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults, for example, anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing, for example for PE
- Secrecy relating to use of technology
- Sexually transmitted disease or pregnancy
- Fire setting

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

## **Signs that MAY INDICATE physical abuse**

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries, such as two bruised eyes
- Bruising to soft area of the face such as the cheeks

- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns, such as cigarette burns
- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Inappropriate/harmful medication usage
- Aggressive behaviour or severe temper outbursts.
- Injuries that cannot be accounted for. Inadequate, inconsistent, or excessively plausible explanations for an injury, or a delay in seeking treatment should signal concern.

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

#### **Signs that MAY INDICATE emotional abuse**

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Secrecy relating to use of technology
- Excessive need for approval, attention, and affection

**Neglect:** 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.

#### **Signs that MAY INDICATE neglect.**

- Constant hunger
- Poor personal hygiene

- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging
- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

# Appendix 2: Support Organisations

## NSPCC 'Report Abuse in Education' Helpline

- [0800 136 663](tel:0800136663) or [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## National Organisations

- NSPCC: [www.nspcc.org.uk](http://www.nspcc.org.uk)
- Barnardo's: [www.barnardos.org.uk](http://www.barnardos.org.uk)
- Action for Children: [www.actionforchildren.org.uk](http://www.actionforchildren.org.uk)
- Children's Society: [www.childrenssociety.org.uk](http://www.childrenssociety.org.uk)
- Centre of Expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

## Support for Staff

- Education Support Partnership: [www.educationsupportpartnership.org.uk](http://www.educationsupportpartnership.org.uk)
- Professional Online Safety Helpline: [www.saferinternet.org.uk/helpline](http://www.saferinternet.org.uk/helpline)
- Harmful Sexual Behaviour Support Service: <https://swgfl.org.uk/harmful-sexual-behaviour-support-service>

## Support for pupils/students

- ChildLine: [www.childline.org.uk](http://www.childline.org.uk)
- Papyrus: [www.papyrus-uk.org](http://www.papyrus-uk.org)
- The Mix: [www.themix.org.uk](http://www.themix.org.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Fearless: [www.fearless.org](http://www.fearless.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)

## Support for Adults

- Family Lives: [www.familylives.org.uk](http://www.familylives.org.uk)
- Crime Stoppers: [www.crimestoppers-uk.org](http://www.crimestoppers-uk.org)
- Victim Support: [www.victimsupport.org.uk](http://www.victimsupport.org.uk)
- The Samaritans: [www.samaritans.org](http://www.samaritans.org)
- NAPAC (National Association for People Abused in Childhood): [www.napac.org.uk](http://www.napac.org.uk)
- MOSAC: [www.mosac.org.uk](http://www.mosac.org.uk)
- Action Fraud: [www.actionfraud.police.uk](http://www.actionfraud.police.uk)
- Shout: [www.giveusashout.org](http://www.giveusashout.org)
- Advice now: [www.advicenow.org.uk](http://www.advicenow.org.uk)

## Support for Learning Disabilities

- Respond: [www.respond.org.uk](http://www.respond.org.uk)
- Mencap: [www.mencap.org.uk](http://www.mencap.org.uk)
- Council for Disabled Children: <https://councilfordisabledchildren.org.uk>

## Contextual Safeguarding Network

- <https://contextualsafeguarding.org.uk/>

## Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): [www.nicco.org.uk/](http://www.nicco.org.uk/)

## **Substance Misuse**

- We are with you (formerly Addaction): [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Talk to Frank: [www.talktofrank.com](http://www.talktofrank.com)

## **Domestic Abuse**

- Domestic abuse services: [www.domesticabuseservices.org.uk](http://www.domesticabuseservices.org.uk)
- Refuge: [www.refuge.org.uk](http://www.refuge.org.uk)
- Women's Aid: [www.womensaid.org.uk](http://www.womensaid.org.uk)
- Men's Advice Line: [www.mensadviceline.org.uk](http://www.mensadviceline.org.uk)
- Mankind: [www.mankindcounselling.org.uk](http://www.mankindcounselling.org.uk)
- National Domestic Abuse Helpline: [www.nationaldahelpline.org.uk](http://www.nationaldahelpline.org.uk)
- Respect Phoneline: <https://respectphoneline.org.uk>

## **Criminal and Sexual Exploitation**

- National Crime Agency: [www.nationalcrimeagency.gov.uk/who-we-are](http://www.nationalcrimeagency.gov.uk/who-we-are)
- It's not okay: [www.itsnotokay.co.uk](http://www.itsnotokay.co.uk)
- NWG Network: [www.nwgnetwork.org](http://www.nwgnetwork.org)
- County Lines Toolkit for Professionals: [www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit](http://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit)
- Multi-agency practice principles for responding to child exploitation and extra-familial harm: <https://tce.researchinpractice.org.uk/>

## **Honour Based Abuse**

- Karma Nirvana: <https://karmanirvana.org.uk>
- Forced Marriage Unit: [www.gov.uk/guidance/forced-marriage](http://www.gov.uk/guidance/forced-marriage)
- FGM Factsheet: [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)
- Mandatory reporting of female genital mutilation: procedural information: [www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information](http://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information)
- The right to choose - government guidance on forced marriage: [www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage](http://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage)

## **Radicalisation and hate**

- Educate against Hate: [www.educateagainsthate.com](http://www.educateagainsthate.com)
- Counter Terrorism Internet Referral Unit: [www.gov.uk/report-terrorism](http://www.gov.uk/report-terrorism)
- True Vision: [www.report-it.org.uk](http://www.report-it.org.uk)

## **Child-on-Child abuse, including bullying, sexual violence and harassment**

- Rape Crisis: <https://rapecrisis.org.uk>
- Brook: [www.brook.org.uk](http://www.brook.org.uk)
- Disrespect Nobody: [www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)
- Upskirting – know your rights: [www.gov.uk/government/news/upskirting-know-your-rights](http://www.gov.uk/government/news/upskirting-know-your-rights)
- Lucy Faithfull Foundation: [www.lucyfaithfull.org.uk](http://www.lucyfaithfull.org.uk)
- Stop it Now! [www.stopitnow.org.uk](http://www.stopitnow.org.uk)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)

- Anti-Bullying Alliance: [www.anti-bullyingalliance.org.uk](http://www.anti-bullyingalliance.org.uk)
- Diana Award: [www.antibullyingpro.com](http://www.antibullyingpro.com)
- Kidscape: [www.kidscape.org.uk](http://www.kidscape.org.uk)
- Centre of expertise on Child Sexual Abuse: [www.csacentre.org.uk](http://www.csacentre.org.uk)

### **Online Safety**

- NCA-CEOP: [www.ceop.police.uk](http://www.ceop.police.uk) and [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)
- Internet Watch Foundation (IWF): [www.iwf.org.uk](http://www.iwf.org.uk)
- Childnet: [www.childnet.com](http://www.childnet.com)
- UK Safer Internet Centre: [www.saferinternet.org.uk](http://www.saferinternet.org.uk)
- Report Harmful Content: <https://reportharmfulcontent.com>
- Marie Collins Foundation: [www.mariecollinsfoundation.org.uk](http://www.mariecollinsfoundation.org.uk)
- Internet Matters: [www.internetmatters.org](http://www.internetmatters.org)
- NSPCC: [www.nspcc.org.uk/onlinesafety](http://www.nspcc.org.uk/onlinesafety)
- Get Safe Online: [www.getsafeonline.org](http://www.getsafeonline.org)
- Parents Protect: [www.parentsprotect.co.uk](http://www.parentsprotect.co.uk)
- Cyber Choices: <https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices>
- National Cyber Security Centre (NCSC): [www.ncsc.gov.uk](http://www.ncsc.gov.uk)

### **Mental Health**

- Mind: [www.mind.org.uk](http://www.mind.org.uk)
- Moodspark: <https://moodspark.org.uk>
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk)
- We are with you: [www.wearewithyou.org.uk/services/kent-for-young-people/](http://www.wearewithyou.org.uk/services/kent-for-young-people/)
- Anna Freud: [www.annafreud.org/schools-and-colleges/](http://www.annafreud.org/schools-and-colleges/)

# Appendix 3: Safeguarding and Referral Form

CONFIDENTIAL

All Safeguarding referrals are made via CPOMS

Link to CPOMS training: <https://vimeo.com/922513786/a82fe7f05a?share=copy>

## Appendix 4: Body Map

Appendix - Four

# Child Protection Body Map

The diagram illustrates a child's body from four perspectives: Front, Back, Right, and Left. Each view is represented by a simple line drawing. The 'Right' and 'Left' views include detailed drawings of the head, hands, and feet. The 'Front' and 'Back' views show the full silhouette of the child.

Right

Front

Back

Left

Name Of Child  
.....

Date Of Birth  
.....

Name of Staff Member  
.....

Date Recorded  
.....

Observations  
.....  
.....  
.....

Signature  
.....



# **Appendix 5: Role and Responsibilities of the Nominated Safeguarding Board Member**

## **Overview**

The Board acknowledge and understand that they have collective duties and responsibilities to safeguard and promote the welfare of children and to ensure that the school's safeguarding policies, procedures and training are effective and comply with the law at all times.

The Board is determined to promote the well-being of children within the school's care and recognises that well-being extends beyond the protection from harm and neglect into areas such as promoting:

- Physical and mental health and emotional wellbeing
- Social and economic wellbeing.
- Opportunities for education, training and recreation.
- Opportunities for contributing to society.

The Board has nominated one of its members to champion best safeguarding practice in the school, supporting the Board not just to discharge its duties under legislation and guidance but to move beyond regulatory compliance.

The Nominated Safeguarding Board Member will:

- Support the Board in its commitment to promote the well-being of children within the school's care.
- Take leadership of the school's safeguarding arrangements, liaising with external agencies where this is required.

## **Role and Duties**

The main role and duties of the Nominated Safeguarding Board Member on behalf of the Board (which retains overall responsibility) are to:

- Champion the promotion of well-being, safeguarding and child protection issues at the highest level within the school.
- Encourage other members of the Board to develop their understanding of the Board's responsibilities about well-being, safeguarding and child protection and support them in the performance of these duties.
- Ensure that the Board puts in place a suitable Safeguarding and Child Protection Policy and associated procedures, which have proper regard to prevailing regulations, guidance, standards and advice.
- Chair the school's Safeguarding Committee that will meet termly.
- Contribute to ensuring any deficiencies in the school's safeguarding practices brought to the Board's attention from any source are investigated and addressed.
- Meet regularly with the school's Designated Safeguarding Lead in order to monitor the effectiveness of the school's Safeguarding and Child Protection Policy and procedures and the implementation of these across the school. It is recommended that this is at least a termly meeting.

- Ensure that the Board receives a report on the implementation of the school's Safeguarding and Child Protection Policy and procedures to support the full Board's review of the safeguarding at the school at least annually (or earlier if needed in response to changes to the law, policy or statutory guidance or as appropriate in response to specific incidents) in accordance with all statutory guidance and guidelines adopted by the Board.
- Alert the Board to any incident, which the Nominated Safeguarding Board member regards as a substantiated safeguarding incident.
- Ensure that the Designated Safeguarding Lead is part of the school's Senior Leadership Team and has sufficient time and resources at his/her disposal to carry out his/her duties effectively.
- Ensure that a Deputy Designated Safeguarding Lead is identified.
- Ensure that the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead receive appropriate training at least every two years.
- Ensure that arrangements are in place for the inclusion of child protection training on the school's procedures in an induction programme for all people working in the school, no matter for how long, nor the status of that individual.
- Ensure safer recruitment procedures are in place and implemented with appropriate checks undertaken on all new staff and volunteers.
- Review the school's Single Central Record on at least a termly basis, after undertaking sufficient training to be able to interrogate the register and identify potential deficiencies. It is recommended that at least one review per year is on an unannounced basis.
- Be aware of how safeguarding and child protection issues, including guidance on adjusting behaviours to reduce risks, the safer use of electronic devices, social media and the internet and advice on who to turn to for help, are properly addressed through the curriculum and schemes of work.
- Ensure that the Board carries out regular risk assessment of factors particular to the school which have a bearing on the profile of particular well-being and safeguarding issues, such as (without limitation) historical concerns, looked after children, mental health, body image, self-harm, children missing education, radicalisation, pupils performing a caring role at home, children with special needs or learning difficulties, those for whom English is an additional language, child sexual exploitation, female genital mutilation and cyber-bullying.
- Both provide to and seek advice from appropriate authorities and other relevant agencies information about how the Board's duties in respect of safeguarding and child protection have been discharged where appropriate or requested.