

# **CHILD PROTECTION AND SAFEGUARDING POLICY AND PROCEDURES**

**September 2021**

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## Child Protection and Safeguarding Policy and Procedures

### COVID-19 Statement

*The government closed all schools, nurseries and further education colleges from Friday 20 March 2020 due to the Covid-19 Pandemic. This was for all children except those of key workers (including NHS staff, police and fire staff) and at risk children (including those who have a social worker or have an education health and care plan). Schools opened partially for children in EYFS, Year 1 and Year 6 in June. Full school opening was achieved by the Academy on the 1<sup>st</sup> of September. The Academy continues to do all within its power to safeguard and protect all of our pupils in these difficult times where isolation, partial and full closures are possibilities. This policy reflects the Pandemic situation and operates and plans for partial or full closure.*

*In accordance with Government guidance and advice from our RBWM Multi-Agency Children's Safeguarding partners we have added an appendix to this document that clearly states our COVID-19 school closure arrangements for Safeguarding and Child Protection.*

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## 1. Introduction

The safety and protection of children is of paramount importance to everyone in this school; safeguarding is everyone's responsibility. Adults in our school take all welfare concerns seriously and encourage children to communicate to us anything that may worry them. Our curriculum ensures that children are taught about safeguarding via Citizenship & Ethics, Physical & Emotional Health, use of classroom discussions and social groups, our safe use of digital technology, Science & Technology, promotion of British Values, Relationships Education and Sex and Relationship Education.

**We are committed to safeguarding at this Academy and see it as our number one priority.**

Safeguarding and promoting the welfare of children can be defined as:

*Protecting children from maltreatment; preventing impairment of children's health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.*

Schools and colleges and their staff are an important part of the wider safeguarding system for children. This system is described in statutory guidance Working Together to Safeguard Children.

Safeguarding and promoting the welfare of children is everyone's responsibility. Everyone who comes into contact with children and their families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child-centred. This means that we should consider, at all times, what is in the best interests of the child.

No single practitioner can have a full picture of a child's needs and circumstances. If children and families are to receive the right help at the right time, everyone who comes into contact with them has a role to play in identifying concerns, sharing information and taking prompt action.

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

- protecting children from maltreatment;
- preventing impairment of children's mental and physical health or development;
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
- taking action to enable all children to have the best outcomes.

### **Definitions:**

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. This includes preventing impairment of children's mental and physical health development.

**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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

**This definition is categorised and defined in detail in section 4**  
**The terms children and child** include everyone under the age of 18.

## 2. Rationale and Legal Framework

- **This policy is based on and has been developed in accordance with the principles established by the Children Act 1989; and in line with the following:**
- The Prevent Duty (Departmental Advice for Schools and Childcare Providers) June 2015
- Working Together to Safeguard Children, July 2018
- Keeping Children Safe in Education Statutory Guidance for Schools and Colleges, September 2021
- Section 175 of the Education Act 2002, which places a duty on schools to safeguard and promote the welfare of pupils Childcare Act 2006, sect.49 & 50
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- DfE (2015) 'What to do if you're worried a child is being abused' (non-statutory guidance).

County Terrorism and Security Act 2015, <https://www.gov.uk/government/collections/counter-terrorism-and-security-bill>

Section 29 of County Terrorism and Security Act 2015 - Prevent Duty Guidance, <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>

- DfE (2017) 'Child sexual exploitation' (non-statutory guidance).
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children
- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.
- UK Safer Internet Centre: appropriate filtering and monitoring <https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>
- Mandatory Reporting of Female Genital Mutilation – procedural information [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/573782/FGM\\_Mandatory\\_Reporting\\_-\\_procedural\\_information\\_nov16\\_FINAL.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/573782/FGM_Mandatory_Reporting_-_procedural_information_nov16_FINAL.pdf)

Voyeurism Act 2019, <https://www.legislation.gov.uk/ukpga/2019/2/section/1/enacted>

- Framework for the Assessment of Children in Need and their Families 2000
- What To Do If You are Worried a Child is Being Abused, March 2015

Teaching online safety in school Guidance supporting schools to teach their pupils how to stay safe online, within new and existing school subjects June 2019

- Royal Borough of Windsor and Maidenhead's Safeguarding Partnership Procedures - Manual online at: [http://berks.proceduresonline.com/windsor\\_maidenhead/index.html](http://berks.proceduresonline.com/windsor_maidenhead/index.html) October 2020
  - **Multi-Agency Safeguarding Hub (MASH) and Early Help Hub:**  
<https://rbwmsafeguardingpartnership.org.uk/>  
 01628 683150 (Hrs 08:45-17:15).  
 Out of hours Team 01344 786543.  
 LADO - Sharon Richards - 01628 683202.
  - A Guide to Eligibility for DBS checks. April 2016  
<https://www.gov.uk/government/publications/dbs-check-eligible-positions-guidance>
  - Further information regarding Mandatory Reporting can be found at:  
<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>

▪ Care of unaccompanied migrant children and child victims of modern slavery - Statutory guidance for Local Authorities on the Care of Unaccompanied Asylum Seeking and Trafficked Children November 2017  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/330787/Care\\_of\\_unaccompanied\\_and\\_trafficked\\_children.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/330787/Care_of_unaccompanied_and_trafficked_children.pdf)

- DfE (2018) 'Information sharing' DfE (2017) 'Child sexual exploitation' (non-statutory guidance).
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges' (non-statutory guidance).

### 3. Aims of this Policy

**"Nothing is more important than children's welfare. Children who need help and protection deserve high quality and effective support as soon as it is identified." Working Together to Safeguard Children, 2018**

The aims of this policy are:

- To ensure that safeguarding is at the forefront and underpins all aspects of our policy and practice.
- To operate an environment that has a **zero-tolerance** approach to abuse.
- To provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties.
- To raise the awareness of all teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse prior to and after disclosure. Staff will receive appropriate safeguarding and child protection training which is regularly updated. Staff members will receive safeguarding and child protection updates as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- To raise awareness around extra familiar harm, removing historical links to contextual safeguarding and emphasising that children may be vulnerable to multiple harms.
- To provide a systematic means of monitoring **all** children known or thought to be at risk of harm, and ensure we, the Academy, contribute to assessments of need and support plans for those children.
- To develop a structured procedure within the school which will be followed by all members of the school community in cases of suspected abuse.
- To ensure that all adults within our school who have access to children have been checked as to their suitability. This includes other community users of our facilities.

- To protect children from the risk of radicalisation and to have due regard to the need to prevent people from being drawn into terrorism. This will include ensuring that we are doing all that we reasonably can to limit children's exposure to the three areas of risks from the school's IT system (Content: being exposed to illegal, inappropriate or harmful material; Contact: being subjected to harmful online interaction with other users; Conduct: personal online behaviour that increases the likelihood of, or causes, harm).
- To ensure that the Academy has appropriate filters and monitoring systems in place to limit children's exposure to the three areas of risk (see above) from the school's IT system.

#### 4. Indication of Abuse and Neglect

All staff should be aware of indicators of abuse and neglect. Knowing what to look for is vital for the early identification of abuse and neglect, and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that staff are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the designated safeguarding lead, or deputy.

All school staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another, therefore staff should always be vigilant and always raise any concerns with their designated safeguarding lead (or a deputy).

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families.

Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, sexual abuse, serious youth violence and county lines.

All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

In all cases, if staff are unsure, they should always speak to the designated safeguarding lead (or deputy)

There are four types of child abuse as defined in 'KCSIE' (July 2021):

**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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.



**-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.

**-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 from 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.

**-Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as peer on peer abuse) in education and all staff should be aware of it and of their school or college's policy and procedures for dealing with it.

**-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, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

**Lowbrook Academy takes a zero tolerance approach to abuse.**

## **5. Possible Signs of Abuse**

**Physical abuse** - Most children will collect cuts and bruises and injuries, and these should always be interpreted in the context of the child's medical / social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental.

Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given; these can often be visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern.

The physical signs of abuse may include:

- Unexplained bruising, marks or injuries on any part of the body.
- Multiple bruises- in clusters, often on the upper arm, outside of the thigh.
- Cigarette burns.
- Human bite marks.
- Broken bones.
- Scalds, with upward splash marks.
- Multiple burns with a clearly demarcated edge.
- FGM.

Changes in behaviour that can also indicate physical abuse:

- Fear of parents being approached for an explanation.
- Aggressive behaviour or severe temper outbursts.
- Flinching when approached or touched.
- Reluctance to get changed, for example in hot weather.
- Depression.
- Withdrawn behaviour.
- Running away from home.

**Emotional Abuse** - Emotional abuse can be difficult to identify as there are often no outward physical signs. Indications may be a developmental delay due to a failure to thrive and grow, however, children who appear well-cared for may nevertheless be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Emotional abuse can also take the form of children not being allowed to mix or play with other children. Child criminal exploitation is a clear form of emotional abuse.

Changes in behaviour which can indicate emotional abuse include:

- Neurotic behaviour, e.g. sulking, hair twisting, rocking.
- Being unable to play.
- Fear of making mistakes.
- Sudden speech disorders.
- Self-harm.
- Fear of parent being approached regarding their behaviour.
- Developmental delay in terms of emotional progress.

**Sexual Abuse** - All Staff and Volunteers should be aware that anyone, who may be men, women or other children, who use children to meet their own sexual needs abuse both girls and boys of all ages. Staff also need to be familiar with sexual exploitation in the UK as outlined in the 2021 KCSIE document. Indications of sexual abuse may be physical or from the child's behaviour. In all cases, children who tell about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to and taken seriously.

The physical signs of sexual abuse may include:

- Pain or itching in the genital area.
- Bruising or bleeding near genital area.

- Sexually transmitted disease.
- Vaginal discharge or infection.
- Discomfort when walking or sitting down.
- Pregnancy.

Changes in behaviour which can also indicate sexual abuse include:

- Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn.
- Fear of being left with a specific person or group of people.
- Having nightmares.
- Running away from home.
- Sexual knowledge which is beyond their age, or developmental level.
- Sexual drawings or language.
- Bedwetting.
- Eating problems such as overeating or anorexia.
- Self-harm or mutilation, sometimes leading to suicide attempts.
- Saying they have secrets they cannot tell anyone about.
- Substance or drug abuse.
- Suddenly having unexplained sources of money.
- Not allowed to have friends (particularly in adolescence).
- Acting in a sexually explicit way towards others.

**Neglect** - It can be difficult to recognise neglect, however its effects can be long term and damaging for children.

The physical signs of neglect may include:

- Being constantly dirty or 'smelly'.
- Constant hunger, sometimes stealing food from other children.
- Losing weight, or being constantly underweight.
- Inappropriate or dirty clothing.
- Lateness and lack of support getting to and from school safely.

Neglect may be indicated by changes in behaviour which may include:

- Mentioning being left alone or unsupervised.
- Not having many friends.
- Complaining of being tired all the time.
- Not requesting medical assistance and/or failing to attend appointments
- Stealing food.

## 6. Designated Safeguarding Lead, Deputy Leads, Staff, Parents/Carers & Community

- Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and Governors in the school and is consistent with the procedures of our safeguarding partners. Our policy and procedures also apply to extended school, out of school and off-site activities.

- **Designated Safeguarding Lead for Child Protection (DSL)**
  - The DSL is a member of the Senior Leadership team. Our DSL is Mr D Rooney, Executive Principal. The DSL takes lead responsibility for child protection and wider safeguarding and who has undertaken appropriate training for the role.
  - This policy ensures that the DSL undertakes training yearly and ensures their skills are updated regularly and at least annually. In RBWM, attendance of three twilight sessions annually for qualified DSLs renews DSL certification.
  - The DSL will liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Roles and Responsibilities are further outlined in **Appendix 1**.

## **7. Deputy Designated Safeguarding Leads**

- We have a further four Deputy Designated Safeguarding Leads, Mrs Reid, (Pauline is also Home Office Accredited Trainers for WRAP (Workshop to Raise Awareness for Prevent), Mrs Denham (Deputy Head), Miss Quinby (Inclusion manager) and Mrs West (EYFS safeguarding lead).
- This policy ensures that Deputy DSLs undertake training yearly and ensures their skills are updated regularly and at least annually. In RBWM, attendance of three twilight sessions annually for qualified DSLs renews DSL certification.
- The name of the Designated Safeguarding Leads will be clearly shown in the school, with a statement explaining the school's role in referring and monitoring cases of suspected abuse.
- The Deputy DSLs are all trained to undertake this responsibility in the absence of the DSL or requested to do so.

## **8. The Governing Body**

- The Governing Body of our school is responsible for ensuring this policy is in place and reviewed at least annually. At this Academy, updates to this policy are made immediately after statutory guidance policy procedures, legislation or LCSB is changed. The policy is then appropriately disseminated to all staff and Governors and then published on the school website. Formal ratification of this policy at Full Governing Body meetings takes place at the first full Governing Body meeting of each academic year.
- The Governing Body understands, takes seriously and fulfils its safeguarding responsibilities under section 175 of the Education Act 2002 to safeguard and promote the welfare of children. The Governing Body ensure that all staff are familiar with statutory guidance and that

mechanisms are in place to assist staff to understand and discharge their role and responsibilities, and ensure they listen, record and act - NOT investigate.

- Safeguarding (as defined in the Joint Inspector's Safeguarding report) is taken to mean, "All agencies working with children, young people and their families take all reasonable measures to ensure that the risk of harm to children's welfare are minimised" and "where there are concerns about children and young people's welfare, all agencies take all appropriate actions to address those concerns, working to agree local policies and procedures in full partnership with other agencies."
- The Governing Body understands, takes seriously and fulfils its safeguarding responsibilities under section 26 of the Counter-Terrorism and Security Act 2015 in the exercise of their functions, to have due regard to statutory guidance issued under section 29 of the CTSA 2015 (Prevent Guidance) to the need to prevent people (and children) from being drawn into terrorism.
- We recognise that all Staff<sup>1</sup> and Governors have a full and active part to play in protecting our pupils from harm, and that the child's welfare is our paramount concern. All professionals who come into contact with the Academy's pupils should make sure their approach is child-centred. This means that they should consider, at all times, what is in the best interests of the child.
- The Governing Body will approve this policy at each review, ensure it complies with the law and hold the Executive Principal to account for its implementation.
- The Governing Body will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the Full Governing Body. This is always a different person from the DSL.
- The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Principal where appropriate (allegations against staff pg. 39).
- All Governors will read Keeping Children Safe in Education and attend Governing Body meetings with updates annually and where it is deemed appropriate.

## 9. Safeguarding Partners

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA) RBWM  
**Kevin McDaniel, Director of Children's Services, Royal Borough of Windsor & Maidenhead**  
01628 683800 - [Kevin.McDaniel@rbwm.gov.uk](mailto:Kevin.McDaniel@rbwm.gov.uk).

<sup>1</sup> "Staff" covers ALL adult staff on site, including temporary, supply and ancillary staff, and volunteers working with children

2. Guidance on the warning signs that FGM or forced marriage may be about to take place, or may have already taken place, can be found on pages 38-41 of the Multi-agency statutory guidance on FGM (pages 59-61 focus on the role of schools and colleges) and pages 13-14 of the Multi-agency guidelines: Handling case of forced marriage.

- A clinical commissioning group for an area within the LA  
**Sarah Bellars, Director of Nursing & Quality, East Berkshire CCG**  
0300 123 6258 - [eastberkscg.enquiries@nhs.net](mailto:eastberkscg.enquiries@nhs.net)
- The chief officer of police for a police area in the LA area  
**Mike Greenwood, Detective Supt, Head of Protecting Vulnerable People, Thames Valley Police**  
<https://www.thamesvalley.police.uk/contact/af/contact-us/us/contacting-a-member-of-staff-or-team/>
- **Angela Ferrucci, TVP Safeguarding Schools Office**  
07968 190529 - [Angela.Ferrucci@thamesvalley.pnn.police.uk](mailto:Angela.Ferrucci@thamesvalley.pnn.police.uk)

<https://www.wamlscb.org/about-the-lscb/new-multi-agency-safeguarding-arrangements/>

## 10. Staff Induction and Training

- All adults, (including supply teachers, regular contractors and volunteers) new to our school are trained in the school's policy and procedures for child protection. This is completed before staff work with children unsupervised. As a key component of this training they read this policy and as a base minimum part 1 of Keeping Children Safe in Education. A register of completed training is signed by all staff.
- All members of staff are provided with opportunities at least every three years to receive Safeguarding and Prevent Duty training arranged or delivered by a school Safeguarding Lead in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed in appropriately sharing a concern of possible abuse or a disclosure of abuse. In addition, all staff members will receive regular safeguarding and child protection updates (for example, via email, e-bulletins, staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- All staff should be aware of their local early help process and understand their role in it.
- All staff should be aware of the process for making referrals to children's social care.
- All staff should know what to do if a child tells them he/she is being abused or neglected.
- All staff should be aware of the role of the Local Authority Designated Officer (LADO).  
Mandy Burrows, Manager LADO Services  
01628 683150 or 01344 786543 (Out of hours- Emergency Duty Team)  
[mash@achievingforchildren.org.uk](mailto:mash@achievingforchildren.org.uk)
- Our policy and procedures will be reviewed at least annually and updated when new Statutory Guidance is published or when new LCSB procedures are received; staff will be informed of any updates.

## **11. Parents/Carers and The Community**

- All Parents / Carers are made aware of the school's responsibilities in regard to child protection procedures through publication of this policy on our website and home school agreement.
- Parents/ Carers who volunteer regularly in school (three times or more during an Academic year) all receive Safeguarding training on the school's procedures, along with being required to read Part 1 of Keeping Children Safe in Education. A register of this is maintained in the school office. All regular volunteers have a DBS check completed by the Academy every three years. (Please refer to Appendices 9 & 10.)
- Parents / Carers who volunteer for a one-off activity receive a one-to-one safeguarding briefing with a Safeguarding Lead or Executive Principal and a risk assessment is completed with them. They will have a staff chaperone with them for the duration of their visit.
- Our lettings policy will seek to ensure the suitability of adults working with children on the school site at any time
- Community users organising activities for children are aware of and understand the need for compliance with the school's child protection guidelines and procedures

## **12. Safer Recruitment and DBS Procedures**

This is covered in procedural detail in Appendix 9, but in summary:

- Our recruitment procedures create a culture that help deter, reject or identify people who might abuse children. As all staff will be engaged in regulated activity, an enhanced DBS certificate is required.
- Our selection and recruitment policy is to include all checks on staff and regular volunteers' suitability, this includes a Disclosure and Barring Service checked in accordance with current legislation and will be renewed by the school every three years.
- The Principal, School Business Manager and Chair of Governors are currently trained in Safer Recruitment. Staff trained in Safer Recruitment always form part of interview panels.
- S128 checks are made on Governors / Trustees, the Executive Principal, Head of School and members of the Senior Leadership Team and Departmental Heads. (The s128 checks that people have not been prohibited from the management of a school. If someone has been prohibited from the management of schools, then this will appear on their DBS certificate.)



- The name of any member of staff considered not suitable to work with children will be notified to the DfE Teachers' Misconduct Team, with the advice and support of Human Resources and in accordance with the NEOST guidance and related regulations<sup>2</sup>. A referral to the DfE, List 99 POCA (Protection of Children's Act) will be made.

### 13. Supporting ALL Children

#### Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 21)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Have a dedicated social worker

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth.

### 14. Early Help

Any child may benefit from early help, but all school and college staff should be particularly alert to the potential need for early help for a child who:

- is disabled 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 care or from home

<sup>2</sup> The 'Barring Regulations' are the Procedures for Barring or Restricting People Working with Children in Education' DfE July 2003



- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- has a family member in prison, 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 drugs or alcohol themselves
- has returned home to their family from care
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child
- is persistently absent from education, including persistent absence for part of the school day

### **15. Early Years Foundation Stage (EYFS)**

This policy recognises The Statutory Framework for Early Years Foundation Stage (EYFS) under section 40 of the Childcare Act 2006. In particular, it links to our Health and Safety Policy ensuring that as a minimum one teacher is Paediatric First Aid trained. Currently, at the Academy all staff working predominantly with under 5s are trained in this.

The school has a Policy for the use of mobile phones, cameras and devices which is specifically covered by this guidance. Personal phones and use of non-school devices are specifically prohibited. Images of children are strictly retained and used by the school for educational purposes only. EYFS must have a practitioner who is designated to take the lead responsibility for safeguarding children. This is currently Mrs West. This lead must have completed child protection training. The EYFS Lead in this school is Mrs West.

### **16. LAC Children**

Miss Veronica Quinby, is the designated person appointed by the Governing Body to promote the educational achievement of children who are looked after. She ensures that she has the relevant information needed in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. She holds information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The Designated Safeguarding Lead will hold details of the child's social worker and the name of the virtual school head in the authority that looks after the child.

- We recognise that the school may provide the only stability in the lives of children who have been abused or who are at risk of harm.
- We recognise that the school plays a significant part in the prevention of harm to our pupils by providing pupils with effective lines of communication with trusted adults, supportive friends and an ethos of protection.

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

## 17. Mental Health

- All staff should also be aware 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.
- Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following [this](#) child protection policy and speaking to the designated safeguarding lead or a deputy.
- The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools. This policy is to be read in conjunction with the school's Anti-bullying policy.
- Mental health is explicitly included in the definition of safeguarding, which now includes "preventing impairment of children's **mental** and physical health or development".
- 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.
- Only trained professionals should make a diagnosis of a mental health problem, but staff are well placed to observe children and identify those whose behaviour suggests they may be experiencing a mental health problem, or be at risk of developing one.
- Abuse, neglect and other traumatic adverse childhood experiences can have a lasting impact, and it's key that staff are aware of how these experiences can affect children's mental health, behaviour and education.
- If you are concerned about a child's mental health, please discuss this with your Team Leader and complete an 'At Risk' form to be reviewed by the DSL. Alternatively go directly to the DSL to report.
- Staff should act on any mental health concerns that are also safeguarding concerns, following this policy and speaking to the designated safeguarding lead (DSL) or deputy.

## 18. Radicalisation

### Definitions

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

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

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

We recognise that protecting children from the risk of **radicalisation** is a part of our wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. As part of the Counter Terrorism and Security Act 2015, schools have a duty to prevent people being drawn into terrorism. This has become known as *Prevent Duty*. We recognise that during the process of radicalisation it is possible to intervene to prevent vulnerable children from being radicalised. As with managing other safeguarding risks, our staff are alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral.

We will prevent radicalisation by:

- Having up to date procedures and training, identifying children at risk and intervene as appropriate.
- We will ensure that regular training on PREVENT gives staff the confidence and knowledge to identify children at risk from being drawn into terrorism, radicalisation and extremism, and staff know how to refer children and young people for further help.
- We will ensure children are safe from terrorist and extremist material when accessing the internet at school, including by establishing appropriate levels of filtering.
- We will develop and deliver training to parents/carers on the dangers and safe use of the internet.
- Frequent team meetings focus on behaviour (including Prevent) and this is filtered back to the SLT via monthly meetings. Reports will be analysed to assist children at risk.
- We promote and teach the Fundamental British Values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs. Through those, we contribute to our students' acceptance of our diverse society.

When making a judgement, staff will ask themselves the following questions:

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- Is there a reason to believe that the pupil has been, or is likely to be, involved with extremist organisations?
- Is the pupil known to have possessed, or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- Does the pupil sympathise with or support illegal/illicit groups?
- Does the pupil support groups with links to extremist activity?
- Has the pupil encountered peer, social, family or faith group rejection?
- Is there evidence of extremist ideological, political or religious influence on the pupil?
- Have international events in areas of conflict and civil unrest had a noticeable impact on the pupil?
- Has there been a significant shift in the pupil's outward appearance that suggests a new social, political or religious influence?
- Has the pupil come into conflict with family over religious beliefs, lifestyle or dress choices?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Has the pupil witnessed or been the victim of racial or religious hate crimes?
- Is there a pattern of regular or extended travel within the UK?
- Has the pupil travelled for extended periods of time to international locations?
- Has the pupil employed any methods to disguise their identity?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil display a lack of affinity or understanding for others?
- Is the pupil the victim of social isolation?
- Does the pupil demonstrate a simplistic or flawed understanding of religion or politics?
- Is the pupil a foreign national or refugee, or awaiting a decision on their/their family's immigration status?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?

Critical indicators include where the pupil is:

- In contact with extremist recruiters.
- Articulating support for extremist causes or leaders.
- Accessing extremist websites.
- Possessing extremist literature.
- Using extremist narratives and a global ideology to explain personal disadvantage.
- Justifying the use of violence to solve societal issues.
- Joining extremist organisations.
- Making significant changes to their appearance and/or behaviour.

Any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

The DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance. Channel programme

Safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable pupil is at risk of being involved in terrorist activities.

In cases where the school believes a pupil is potentially at serious risk of being radicalised, the Headteacher or DSL will contact the Channel programme.

The DSL will also support any staff making referrals to the Channel programme.

The Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism, and before they become involved in criminal terrorist-related activity.

The programme identifies individuals at risk, assesses the extent of that risk, and develops the most appropriate support plan for the individuals concerned, with multiagency cooperation and support from the school.

The delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from CSCS, or where the individual is already known to CSCS

## 19. The Prevent Duty and Channel

### The Prevent Duty

- All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have “due regard to the need to prevent people from being drawn into terrorism”.<sup>110</sup> This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare). The guidance is set out in terms of four general themes: Prevent, Pursue, Protect, and Prepare. There is additional guidance: Prevent duty guidance: for further education institutions in England and Wales that applies to colleges.

### Channel

- Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the

individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/928326/6.6271\\_HO\\_HMG\\_Channel\\_Duty\\_Guidance\\_v13\\_WEB\\_English.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/928326/6.6271_HO_HMG_Channel_Duty_Guidance_v13_WEB_English.pdf)

## 20. Honour Based Abuse – FGM and Forced Marriage

- We recognise that we must protect children from **Honour Based Abuse (HBA) (previously known as Honour Based Violence (HBV))**. So-called HBA encompasses crimes which have been committed to protect or defend the honour of the family and /or community. This now includes non-violent abuse but encompasses Female Genital mutilation (FGM) and forced marriage. FGM comprises all procedures involving partial or total removal of external female genitalia or other injury to the female genital organs causing long-lasting harmful consequences. Forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any form of coercion is used to cause a person to enter into a marriage.

Staff will be trained in identifying signs of HBA during safeguarding updates.

- All forms of HBA are abuse and will be handled and escalated as such. If a child discloses to a teacher that they have been a victim of FGM or a teacher observes signs that FGM has been carried out, then that teacher has a legal responsibility to report this person to the relevant police force within one working day; this duty cannot be passed to another member of staff although the teacher will be supported by the Designated Safeguarding lead. If a member of staff who is not a teacher has a disclosure of FGM made to them, they will immediately inform the Designated Safeguarding Lead who will take the lead on reporting this.
- FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at:  
<https://www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information>
- Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow

local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty:

[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)

## 21. Special Education Needs

We recognise that children with **special educational needs and disabilities (SEND)** face additional safeguarding barriers and challenges. Lowbrook Academy acknowledges the barriers that can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- Children with SEN and disabilities can be disproportionately impacted by things like bullying without showing outwardly any signs.
- Communication barriers and difficulties in overcoming these barriers.
- Possible vulnerability to online exposure and abuse.

Lowbrook's day to day practice will take into account these challenges will be a key point in safeguarding training at this Academy.

## 22. Children Missing From Education

- We recognise that if a child goes **Missing From Education**, it is a potential indicator of abuse or neglect. By law, the school has an admissions register and an attendance register and all pupils are placed on both. The Designated Safeguarding Lead is responsible for monitoring attendance and will notify an EWO (Education Welfare officer) when attendance falls below 90% or has been absent without the school's permission for a period of 10 school days or more. In addition to this the school will inform the Local Authority (RBWM):

- Deborah Maynard, Safeguarding Partnership Manager ([deborah.maynard@rbwm.gov.uk](mailto:deborah.maynard@rbwm.gov.uk))  
or
- Ella O'Neill, Project Officer ([ella.o'neill@rbwm.gov.uk](mailto:ella.o'neill@rbwm.gov.uk))

of any pupil who:

- Has been taken out of education by their parents/careers and the school has received written notification that they are being educated outside the school system.
  - Has ceased to attend school and no longer lives within reasonable distance of the school.
  - Are in custody.
  - Have been permanently excluded (please refer to the school's Attendance Policy and Exclusion Policy).
- Unaccompanied asylum-seeking children and child victims of human trafficking are some of the most vulnerable children in the country. Trafficked children can be at risk of returning to their



traffickers and of further exploitation for sex, forced labour, domestic servitude or criminal activities. The Governing Body will work with the local authority to protect and support these highly

vulnerable children. This will include a multi-agency approach, which is essential in protecting trafficked children from further risk from their traffickers. In particular, they will work closely with RBWM Local Safeguarding Children Boards and the police in planning protection and responding if a trafficked child goes missing.

### 23. Online Safety

- We recognise that the use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation - technology often provides the platform that facilitates harm. We will ensure that we protect and educate our pupils in their use of technology and establish mechanisms to identify, intervene and escalate any incident where appropriate. We ensure that we use the Department for Education's (DfE) latest online safety guidance to inform our practice.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/811796/Teaching\\_online\\_safety\\_in\\_school.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/811796/Teaching_online_safety_in_school.pdf)
- The Voyeurism (Offences) Act came into force on April 2019. It clearly defines upskirting as an offence. Appropriate and safe use of ICT equipment is covered in our school's curriculum and staff are aware of the new legislation. **Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.
- The Academy's infrastructure includes robust filtering and monitoring systems. Children are systematically taught how to access the internet safely and is detailed in our E-mail, Internet and E-Safety Policy. A **mobile phone** and device policy is in place that strictly limits personal used when in contact with the children. All images of children that are acquired in school devices are contained within the school environment and are used for the purposes of the school only.
- The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:
  - Content: being exposed to illegal, inappropriate or harmful material
  - Contact: being subjected to harmful online interaction with other users
  - Conduct: personal online behaviour that increases the likelihood of, or causes, harm
  - Commerce: risks such as online gambling, inappropriate advertising and phishing

We will do all that we reasonably can to limit children's exposure to these risks from the Academy's IT system by ensuring that there are appropriate filters and monitoring systems in place and are informed in part by the risk assessment required by the Prevent Duty (please refer to Appendix 6).

- Schools in England (and Wales) are required "to ensure children are safe from Terrorist and extremist material when accessing the internet in school, including by establishing appropriate levels of filtering (Prevent Duty 2015)." We ensure that access to illegal content is blocked, specifically that the filtering providers are IWF members and block access to illegal Child Abuse Images and Content (CAIC). Smoothwall.com are the



manufacturer of our web filter. They are members of the Internet Watch Foundation (IWF) and filter content into over 100 filter categories in realtime without having to rely on proprietary URL database.

- Our **Monitoring and Filtering Systems** ensure that Staff always directly supervise children whilst using technology including the Internet.
- Whilst we recognise that no monitoring can guarantee to be 100% effective, we will ensure that our Monitoring and Filtering System is as robust as possible. It includes filtering for Key words, controlled by Google managed by Key Networks that automatically forces Safe Search and blocks access to inappropriate websites. Our Monitoring and Filtering System covers all content as referred to in Appendix 3.
- We ensure that our system does not over block access so it does not lead to unreasonable restrictions and that our filtering system meets the following principles:
- Age appropriate, differentiated filtering – includes the ability to vary filtering strength appropriate to age and role; Student and staff are differentiated.
- Control - has the ability and ease of use that allows schools to control the filter themselves to permit or deny access to specific content; IT provider and onsite IT Leader, Mrs Raman Herr, have access to filtering controls.
- Filtering Policy – the filtering provider publishes a rationale that details their approach to filtering with classification and categorisation as well as over blocking.
- Identification - the filtering system should have the ability to identify users; filter is user and device aware (where possible)
- Mobile and App content – isn't limited to filtering web traffic and includes the blocking of inappropriate content via mobile and app technologies. Encrypted traffic sent by apps like WhatsApp cannot be intercepted by the filter, school provided device should/are not permitted to use apps of this nature.
- An appropriate level of security is managed at a Network level - filtering should be applied at 'network level' i.e., not reliant on any software on user devices. Smoothwall.com works at the network level. (Smoothwall.com are the Filter Manufacturer).
- Reporting mechanism – the ability to report inappropriate content for access or blocking. Key Networks send an automated weekly email to Pauline Reid (School Business Manager, DSL, Prevent Trainer), Laura Denham(Deputy Head Teacher), Dave Rooney (Principal, DSL) and Raman Herr (ICT Lead) alerting the Academy to web traffic events that violate our policy (emails provided by Microsoft and managed by Key Networks). Please refer to Prevent Risk Assessment in Appendix 6.
- Key Networks would inform us immediately if there was a serious breach e.g. multiple attempts to access an inappropriate website by a single user.
- Reports – the system offers clear historical information on the websites visited by your users; Data is retained for 30 days.

- Online safety: The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into three areas of risk:

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 (e.g consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying; and
  - commerce - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).
- The curriculum robustly educates children in the safe use of technology and online safety across all age groups as identified in our well sequenced curriculum maps. Children with SEND may require adaptations or additional teaching and strategies or protections to safely interact with online content. Where this is the case it will be identified on the Pupils Passport along with the reasonable adjustments required.
  - Parental engagement is prioritised and our website contains up to date education materials for parents. We also offer annual courses on online safety via a local consultant Paul Hay who then offers continued support and assistance where required.
  - During COVID-19, inclusive of children isolating and working from home, the school developed a policy for safe working based on the ‘guidance on safeguarding and remote education during Coronavirus’. This policy and guidance is to be used in conjunction with this policy.
  - The schools’ policy on Online safety is reviewed annually as is our filtering system. This is our risk assessment process however as new dangers and risks arise these are dealt with immediately.
  - Where children are being asked to learn online at home the Department of Education has provided advice to support schools and colleges do so safely- The school has developed its own policy regarding this.

#### **24. Mobile Phone and Camera Safety**

- Staff members will not use personal mobile phones or cameras when pupils are present.
- Staff may use mobile phones on school premises outside of working hours when no pupils are present.
- Staff may use mobile phones in the staffroom during breaks and non-contact time.
- Mobile phones will be safely stored and in silent mode whilst pupils are present.
- Staff will use their professional judgement in emergency situations.
- Staff may take mobile phones on trips, but they must only be used in emergencies and should not be used when pupils are present.
- Mobile devices will not be used to take images or videos of pupils or staff in any circumstances.
- The sending of inappropriate messages or images from mobile devices is strictly prohibited.
- Staff who do not adhere to this policy will face disciplinary action.
- The Executive Headteacher will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission
- The schools will adhere to the terms of the E-Safety Policy at all times.
- Photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy.
- The DPO will oversee the planning of any events where photographs and videos will be taken.
- Where photographs and videos will involve LAC pupils, adopted pupils, or pupils for whom there are security concerns, the Executive Headteacher/DSL will liaise to determine the steps involved to insure relevant permissions are sought.
- The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with the pupil.
- The federation will adhere to its GDPR Policy at all times.
- Staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the RBWM guide for staff and volunteers who are faced with any allegation of abuse.
- Sports clubs and extracurricular activities
- During COVID-19 personal use with parents has been permitted and sole use has been additional in our 'remote learning policy'. They can only be used with no ID Caller made.

#### **25. Child on Child Abuse (previously known as Peer on Peer Abuse)**

All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). Staff need to maintain an attitude that *"It could happen here,"* and that it can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports. All staff should understand, that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy). It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are

actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it. Peer on peer abuse is most likely to include, but may not be limited to:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence);
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse; For further information about sexual violence see Annex B. 12 of KCSIE For further information about sexual harassment see Annex B. 16 of KCSIE
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party;
  - consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery);
- upskirting, which typically involves taking a picture under a person’s clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm; and
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

It is important that staff are aware that technology is a significant component in many safeguarding and wellbeing issues and be aware that children can abuse their peers online through:

- Abusive, harassing, and misogynistic messages,
- Non-consensual sharing of indecent nude and semi-nude images/or videos, especially around chat groups,
- Sharing of abusive images and pornography, to those who don’t want to receive such content.

It is important to recognise that abuse can take place inside and outside of school or online.

All staff should be clear as to the school’s policy and procedures with regard to peer on peer abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

The type of abuse may have a varying effect on the victim and initiator of the harm, the DSL will clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm. After gathering the facts, the DSL will consider the intent (begin to Risk Assess) and if there has been a deliberate or contrived situation for a young person to be able to harm another. The DSL will decide on the next course of action and whether to make a safeguarding referral to social care or early help (where a crime has been committed the police should be involved). We will also inform the parents of the children involved. The DSL and Executive Principal will consider the form the abuse may have taken and will decide upon the subsequent actions that are required. The school’s Behaviour and Exclusion Policies may be used alongside this policy.

Children and young people who abuse others will be responded to in a way that meets their needs as well as protecting others within the school community through a multi-agency risk assessment. We ensure that the needs of children and young people who abuse others will be considered separately from the needs of their victims.

Victims of abuse will likely find the experience distressing, which can be made worse if the alleged perpetrator(s) attend the same school. All victims will be assessed by the DSL and Principal and where appropriate an action plan will be created address any arising need.

Staff are clear as to the school policy and procedures with regards to child on child abuse.

This policy recognises the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys the perpetrator(s), but that all peer-on-peer abuse is unacceptable and will be taken seriously.

Staff recognise that child on child abuse can and will occur on any site even with the most stringent of policies and support mechanisms and that it may be taking place, even if not reported. Consequently, the Academy has an open environment where children feel safe to share information about anything that is upsetting or worrying them. This is strengthened through a strong and positive Physical and Emotional Health and Citizenship and Ethics curriculum that tackles such issues as prejudiced behaviour and gives children an open forum to talk things through rather than seek one on one opportunities to be harmful to one another. Regular *At Risk* meetings are held at team and SLT level and ELSA is used where we have reason to believe children may be vulnerable. The schools have adopted a mental health strategy which may well help identify children at risk of child on child abuse. High levels of supervision are also in place as well as boundary areas in school that reduce bullying or abuse zones. All staff are trained in recognising signs of abuse. There is a whole school approach to this.

Child on child abuse is to be recorded on the Safeguarding concerns pro-forma referred to in Appendix 5.

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

Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE). 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. Child Criminal Exploitation (CCE).

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into

carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Further information about CCE including definitions and indicators is included in Annex B of KCSIE.

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

CSE can occur over time or be a one-off occurrence, and may happen without the child's immediate knowledge e.g. through others sharing videos or images of them on social media. CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship. Further information about CSE including definitions and indicators is included in Annex B of KCSIE.

The school has adopted the 2017 Guidance Child Sexual Exploitation, Section B for managing responses to CSE.

School staff members are aware of and look for the key indicators of CSE; these are as follows:

- Going missing for periods of time or regularly going home late
- Regularly missing lessons (in a primary school – whole days)
- Appearing with unexplained gifts and new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Undergoing mood swings or drastic changes in emotional wellbeing
- Displaying inappropriate sexualised behaviour
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying changes in emotional wellbeing
- Misusing drugs or alcohol Referring cases

Where CSE or CCE, or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

The Police and LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.



## 27. Serious Violence

- All staff know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. We recognise Government concern regarding county lines. County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of “deal line”. They are likely to exploit children and vulnerable adults to move and store the drugs and money and they will often use coercion, intimidation, violence (including sexual violence) and weapons.

Indicators that children may have become involved in serious crime include:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in well-being
- Signs of assault/unexplained injuries

### Sexual violence

Sexual violence refers to the three following offences:

- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
- **Harmful sexual behaviours**

The term “harmful sexual behaviour” is used to describe behaviour that is problematic, abusive and violent, and that may cause developmental damage. Harmful sexual behaviour may include:

- Using sexually explicit words and phrases.
- Inappropriate touching.
- Sexual violence or threats.
- Full penetrative sex with other children or adults.
- Sexual interest in adults or children of very different ages to their own.
- Forceful or aggressive sexual behaviour.
- Compulsive habits.
- Sexual behaviour affecting progress and achievement.
- Using sexually explicit words and phrases.
- Inappropriate touching.

- Sexual violence or threats.
- Sexual behaviour can also be harmful if one of the children is much older (especially where there is two years or more difference, or where one child is pre-pubescent and the other is not) and where the child may have SEND. A preventative approach
- In order to prevent peer-on-peer or child-on-child abuse and address the wider societal factors that can influence behaviour, the school will educate pupils about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and PSHE lessons.
- The school will also ensure that pupils are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in PSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:
  - Healthy relationships
  - Respectful behaviour
  - Gender roles, stereotyping and equality
  - Body confidence and self-esteem
  - Prejudiced behaviour

The school has a culture:

- That sexual violence and sexual harassment is always wrong;
- Addressing cultures of sexual harassment and maintaining a “*it could happen here,*” mindset;
- Pupils will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled
- All staff will be aware that pupils of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up,”;
- All staff will be aware that peer-on-peer or child-on-child abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted, and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm;
- All staff will be made aware of the heightened vulnerability of pupils with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the pupil’s SEND and will always explore indicators further;
- LGBTQ+ children can be targeted by their peers. In some cases, children who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ children.
- The school’s response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex;
- Pupils will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers;

**Support available if a child has been harmed, is in immediate danger or at risk of harm**

- If a child has been harmed, is in immediate danger or is at risk of harm, a referral will be made to CSCS.
- Within one working day, a social worker will respond to the referrer to explain the action that will be taken.

**Support available if early help, section 17 and/or section 47 statutory assessments are appropriate**



- If early help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

#### **Support available if a crime may have been committed**

- Rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to CSCS. The DSL will be aware of the local process for referrals to both CSCS and the police.
- Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach.
- The federation has a close relationship with the local police force and the DSL will liaise closely with the local police presence.

#### **Support available if reports include online behaviour**

- Online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim, or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist.
- If the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed.
- Staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

### **28. County Lines**

- The school will be aware of any children who are Young Carers and recognise that there may be a need for potential early help. This will include the signs of county lines exploitation techniques outlined in KCSIE:
- For the purpose of this policy, “County lines criminal activity” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns, or across counties.
- Staff will be made aware of pupils with missing episodes who may have been trafficked for the purpose of transporting drugs.
- Staff members who suspect a pupil may be vulnerable to, or involved in, this activity will immediately report all concerns to the DSL.
- The DSL will consider referral to the National Referral Mechanism on a case-by-case basis.
- Indicators that a pupil may be involved in county lines active include the following:
  - Persistently going missing or being found out of their usual area;
  - Unexplained acquisition of money, clothes or mobile phone;
  - Excessive receipt of texts or phone calls;
  - Relationships with controlling or older individuals or groups;
  - Leaving home without explanation;
  - Evidence of physical injury or assault that cannot be explained;

- Carrying weapons;
  - Sudden decline in school results;
  - Becoming isolated from peers or social networks;
  - Self-harm or significant changes in mental state;
  - Parental reports of concern.
- The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:
    - content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
    - contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults;
    - conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying;
    - commerce: risks such as online gambling, inappropriate advertising, phishing.
  - The school will seek early help if they believe a child is in a family circumstance presenting challenges for a child such as drug and alcohol misuse, adult mental health issues and domestic abuse.
  - Staff are aware that safeguarding incidents and/or behaviours can be associated with factors outside school and/or can occur between children outside of the environment. Staff will consider whether children are at risk of abuse or exploitation in situations outside their families (e.g. sexual exploitation, criminal exploitation and serious youth violence.)

Our school will support **all** pupils by:

- Maintaining an ethos, which is understood by all staff, which enables children to feel secure and encourages them to talk knowing that they will be listened to.
- Encouraging the development of self-esteem and resilience in every aspect of school life including through the curriculum.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children.
- Ensuring that all children know there is an adult in the school whom they can approach if they are worried or in difficulty.
- Providing, across the curriculum, opportunities which equip children with the skills they need to stay safe from harm and to know to whom they should turn for help.
- Ensuring children are taught about safeguarding, including online safety training throughout our curriculum.

## 29. Domestic Abuse and Operation Encompass

### Domestic abuse

- The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. In essence, due to the harm inflicted by witnesses and living with domestic abuse the children are by this association victims of abuse themselves.

### Operation Encompass

- Operation Encompass operates in the majority of police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (the designated safeguarding lead at Lowbrook) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs. Police forces not signed up to operation encompass will have their own arrangements in place.

## 30. Homelessness

- Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.
- The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

- In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances
- <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheet>

### 31. Private Fostering Arrangements

- A private fostering arrangement occurs when someone other than a parent or a close relative cares for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16, or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.
- Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age. Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.
- By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. Should the Academy become aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, the Academy will encourage parents and private foster carers to notify Children's Social Care and will share information with Children's Social Care as appropriate.

### 32. Children who need a social worker

- The particular vulnerability of children who have a social worker is recognised. This relates to the research on "What Works in Education for Children who have social workers".
- Children may need a social worker due to a safeguarding or welfare need such as abuse or complex family circumstances.
- The DSL will hold information on these children and continually monitor future risks of further harm, learning, behaviour, attendance and mental health and well-being. Where appropriate intervention and help are triggered early. This will include children who have previously needed a social worker.
- Staff will have an understanding of this cohort's academic progress and attainment, and maintaining a culture of high aspirations for this cohort;
- The DSL will support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker to reach their potential.

### 33. Confidentiality and information sharing arrangements, including multi-agency working arrangements.

- We recognise that all matters relating to child protection are confidential. The Executive Principal or Designated Safeguarding Lead will disclose personal information about a pupil to other members of staff on a need to know basis only.
- However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children and to balance the risk of not sharing with the risk of sharing.
- All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.
- Our referral procedures are in accordance with Government guidance and that of the 'Berkshire Local Safeguarding Children Boards (LSCB) Child Protection Procedures Manual online at: [http://berks.proceduresonline.com/windsor\\_maidenhead/index.html](http://berks.proceduresonline.com/windsor_maidenhead/index.html) October 2020. We adhere to the agreed multi-agency arrangements put in place by our three safeguarding partners (RBWM LA, the clinical commissioning group and the Chief Officer for Police). This policy reflects the local protocol for assessment outlined: <https://www.wamlscb.org/professionals/mash-early-help/>
- We will always undertake to share our intention to refer a child to the Multi-Agency Safeguarding Hub (MASH) with their parents /carers unless to do so could put the child at greater risk of harm, or impede a criminal investigation. Guidance on the GDPR has been clarified in KCSIE paragraph 84. **The school can refuse to share information if a serious harm test is met.**
- We will share information with informed consent where appropriate and, where possible respect the wishes of those who do not consent to share confidential information. Information may still be shared without consent if, there is a good reason to do so, such as where safety may be at risk (This will include first contact with the safeguarding hub MASH). Judgement should be based on the facts of the case. When sharing or requesting personal information, the basis on which it is done must be certain.
- Any written information which is shared with external agencies will be sent via a password protected .pdf document with the instruction for the receiver to call the sender in order to obtain the password.
- When a child transfers to another school, the safeguarding records will be securely transferred to the new school or provision within 5 days of term starting or the child transfers. Receipts for these documents will be requested. The school's DSL will also do an appropriate handover of information with the child's new schools/institution. Records will not be retained by the Academy once transition is complete.
- It is important that Governors and staff understand the obligations under the Data Protection Act 2018 and that GDPR places duties on organisations and individuals to process personal information fairly, lawfully and to keep it in a secure safe place. The Academy keeps all Child

protection document locked and in a non- public area of the school. Only the DSL and deputy DSLs can access this information.

- **The Data protection act and GDPR do not prevent, or limit, 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 promote the welfare and protect the safety of children.**

#### 34. Supporting Staff

- We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the Designated Safeguarding Lead and to seek further support. This could be provided by the Principal or another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate.
- Where appropriate the school will fund and provide up to 6 counselling sessions for staff if affected by safeguarding related issues.
- In consultation with all staff, we have adopted a code of conduct for staff at our school. This forms part of staff induction and is in the staff handbook. We understand that staff should have access to advice on the boundaries of appropriate behaviour.

#### 35. Reporting and Initial Response to Safeguarding concerns, disclosures and allegations about a child

- Whenever a member of staff has a concern about a pupil they will **immediately** report it to the DSL or Deputy in their absence following the procedures in **Appendix 4** and complete a Safeguarding Concern Form **Appendix 5 (handwritten and signed)**.
- Staff do not need to wait for a child to make a disclosure, they should act on any concerns immediately.
- All staff are trained in **-The immediate response to a report Responding to the report**. These procedures are in appendix 5.
- When a child discloses NSPCC carried out research to find out how adults can better respond to a child who is disclosing abuse (Baker et al, 2019). they found three key interpersonal skills that help a child feel they are being listened to and taken seriously:
  - show you care, help them open up: Give your full attention to the child or young person and keep your body language open and encouraging. Be compassionate, be understanding and reassure them their feelings are important. Phrases such as 'you've shown such courage today' help.
  - take your time, slow down: Respect pauses and don't interrupt the child – let them go at their own pace. Recognise and respond to their body language. And

remember that it may take several conversations for them to share what's happened to them.

- show you understand, reflect back: Make it clear you're interested in what the child is telling you. Reflect back what they've said to check your understanding – and use their language to show it's their experience.

If a child tells you they are experiencing abuse, it's important to reassure them that they've done the right thing in telling you. Make sure they know that abuse is never their fault. You, must never promise that you will keep it a secret and you must pass the information on to the right person to help keep them safe.

You can ask a child outright if they have been harmed and what the nature of the harm was.

Never talk to the alleged perpetrator about the child's disclosure.

- **Escalating a concern.** If you are not satisfied that sufficient actions have been taken about your concern, then escalate this by speaking to the Principal. Remember there is no hierarchy in safeguarding. If you are still dissatisfied with the action taken within school, notify the Chair of Governors or Governor responsible with safeguarding and if you are still not satisfied contact the RBWM MASH Team (01628 683150), or (01344 786543) if out of hours.
- Appendix 2 details the Academy's procedures to follow when there are concerns about a child.

### 36. Reporting to the Police

- Reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to CSCS. The DSL and deputies will follow the local process for referral.
- Parents will be informed unless there is a compelling reason not to do so. Where parents are not informed, it is essential for the school to support the child with any decision they take, in unison with CSCS and any appropriate specialist agencies.
- The DSL and governing board will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents. They will also discuss the best way to protect the victim and their anonymity.
- The DSL will be aware of local arrangements and specialist units that investigate child abuse. In some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.



### 37. Allegations against staff

**This encompasses allegations made against/Concerns raised in relation to teachers, including supply teachers, other staff, governors, volunteers and contractors.**

- This section of the policy has two sections covering the two levels of allegation/concern:
  1. Allegations that may meet the harms threshold.
  2. Allegation/concerns that do not meet the harms threshold – referred to for the purposes of this guidance as ‘low level concerns’.

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

- This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school, including supply teachers, volunteers and contractors 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.
- The last bullet point above includes behaviour that may have happened outside of school, that might make an individual unsuitable to work with children, this is known as transferable risk.
- Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).
- Allegations should be reported to the Principal and that this should be done without delay. If the allegation is about the Principal then the report should be made to the Governors who will seek advice immediately from the LADO. A “case manager” will lead any investigation. This will be either the Principal, or, where the headteacher is the subject of an allegation, the chair of governors.

#### **The initial response to an allegation:**

- Where the school identify a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children’s social care and as appropriate the police immediately and then contact the LADO.
- There are two aspects to consider when an allegation is made:
  1. **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children’s social care and;



**2. Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

- When dealing with allegations, schools should:
  - apply common sense and judgement;
  - deal with allegations quickly, fairly and consistently; and
  - provide effective protection for the child and support the person subject to the allegation.
- Schools should ensure they understand the local authority arrangements for managing allegations, including the contact details and what information the LADO will require when an allegation is made PH 01628 683150 mash@achievingforchildren.org.uk . Before contacting the LADO, the school should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:
  - was the individual in the school at the time of the allegations?
  - did the individual, or could they have, come into contact with the child?
  - are there any witnesses? and,
  - was there any CCTV footage?
- These are just a sample of example questions. School should be familiar with what initial information the LADO will require. This information can be found in local policy and procedural guidance provided by the LADO service RBWM.
- When to inform the individual of the allegation should be considered carefully on a case by case basis, with guidance as required from the LADO, and if appropriate children's social care and the police.
- If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children's social care will be convened in accordance with the statutory guidance:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/942454/Working\\_together\\_to\\_safeguard\\_children\\_inter\\_agency\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/942454/Working_together_to_safeguard_children_inter_agency_guidance.pdf)
- If the allegation is about physical contact, for example restraint, the strategy discussion or initial evaluation with the LADO should take into account that teachers and other school staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour. Further information about the use of reasonable force can be found <https://www.gov.uk/>. The vast majority of staff at Lowbrook are trained in restraint via TeamTeach.
- Where the case manager is concerned about the welfare of other children in the community or the member of staff's family, they should discuss these concerns with the designated safeguarding lead and make a risk assessment of the situation. It may be necessary for the designated safeguarding lead to make a referral to children's social care.
- Where it is clear that an investigation by the police or children's social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

### **No further action**

Where the initial discussion leads to no further action, the case manager and the LADO should:

- record the decision and justification for it; and,
- agree on what information should be put in writing to the individual concerned and by whom.

### **Further enquiries:**

- Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. In straightforward cases, the investigation should normally be undertaken by a senior member of the school's staff.
- Where there is a lack of appropriate resource within the school, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator. Many local authorities provide for an independent investigation of allegations for schools that are maintained by the local authority, often as part of the HR/personnel services that schools and colleges can buy in from the authority. It is important that local authorities ensure that schools in that area have access to an affordable facility for independent investigation where that is appropriate.
- The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.
- Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance to schools and colleges when considering allegations against adults working with children. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Supply teachers and all contracted staff**

- In some circumstances the school will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business.
- Whilst schools are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. Governing bodies should discuss with the supply agency or agencies where the supply teacher is working across a number of schools or colleges, whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school or college, whilst they carry out their investigation.
- Agencies should be fully involved and co-operate with any enquiries from the LADO, police and/or children's social care. The school will usually take the lead because agencies do not have direct access to children or other school or college staff, so they will not be able to collect

the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body when working in the school. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency or agencies are taken into account by the school or college during the investigation.

- When using a supply agency, the school will inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### Governors

- If an allegation is made against a governor, the school should follow their own local procedures as designed by RBWM. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

### Suspension

- Suspension should not be an automatic response when an allegation is reported. All options to avoid suspension should be considered prior to taking that step. The case manager **must** consider carefully whether the circumstances warrant suspension from contact with children at the school, or until the allegation is resolved. It should be considered only in cases where there is cause to suspect a child or other children at the school or college is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. If in doubt, the case manager should seek views from their personnel adviser and the LADO, as well as the police and children's social care where they have been involved.
- Where a school made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at a school, they should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual **must not** carry out teaching work.
- In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the school or college, based on consultation with the LADO who will provide relevant information they have received from the police or children's social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.
- Based on advice from the school's HR provider and/or a risk analysis drawn up with the LADO, the following alternatives should be considered by the case manager before suspending a member of staff:
  - redeployment within the school so that the individual does not have direct contact with the child or children concerned;
  - providing an assistant to be present when the individual has contact with children;
  - redeploying to alternative work in the school or college so the individual does not have unsupervised access to children;

- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes accounts of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
  - temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or where available, work for the local authority or academy trust.
- These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.
  - If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.
  - Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.
  - Children's social care or the police may give their view to the LADO but they cannot require the case manager to suspend a member of staff or a volunteer, although the case manager should give appropriate weight to their views. The power to suspend is vested in the governing body who are the employers. However, where a strategy discussion, or initial assessment, concludes that there should be enquiries by the children's social care, and/or an investigation by the police, the LADO should canvass police and children's social care for views about whether the accused member of staff should be suspended from contact with children. Police involvement does not make it mandatory to suspend a member of staff; this decision should be taken on a case-by-case basis having undertaken a risk assessment about whether the person poses a risk of harm to children.

#### **Supporting those involved- Duty of Care**

- **The welfare of a child is paramount** and this will be the prime concern in terms of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation. The school will offer up to six counselling sessions and a school mentor.
- **Employers have a duty of care to their employees.** They should:
  - manage and minimise the stress caused by the allegation;
  - inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
  - advise the individual to contact their trade union representative, or a colleague for support;
  - appoint a named representative to keep the person informed about progress of the case;

- provide access to counselling or medical advice where appropriate. This will be through occupational health arrangements; and not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

**Parents or carers of the child or children involved should be:**

- formally told about the allegation as soon as possible. The case manager should consult the LADO and where involved children's social care and/or the police on what information can be disclosed;
- kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
- made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress as set out in section 141F of the Education Act 2002 (see paragraphs 372-380).

**Confidentiality and Information sharing**

- In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.
- Where the police are involved, wherever possible the school should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.
- Children's social care should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.
- The school and college **must** make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a school who has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).
- The reporting restrictions apply until:
  - the point that the accused person is charged with a relevant offence; or
  - the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.
- The reporting restrictions are disapplied if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.
- The legislation prevents the "publication" of material by any person that may lead to the identification of the teacher who is the subject of the allegation. "Publication" includes "any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public." This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents

aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

- In accordance with the Authorised Professional Practice published of Policing in May 2017, the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. In exceptional cases where the police wish to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted.
- The case manager should take advice from the LADO, police and children's social care to agree the following:
  - who needs to know and exactly what information can be shared;
  - how to manage speculation, leaks and gossip; what, if any, information can be reasonably given to the wider community to reduce speculation; and,
  - how to manage press interest if, and when, it should arise.

### **Allegation outcomes**

- The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:
  - **Substantiated:** there is sufficient evidence to prove the allegation;
  - **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
  - **False:** there is sufficient evidence to disprove the allegation;
  - **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
  - **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- Ultimately the options open to the school or college depend on the nature and circumstances of the allegations and the evidence and information available. This will range from taking no further action, to dismissal or a decision not to use the person's services in future. Suspension should not be the default position, an individual should be suspended only if there is no reasonable alternative.
- If the allegation is substantiated and:
  - the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
  - the employer ceases to use the person's services.
 The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
- In the case of a member of teaching staff at a school or sixth form college, the case manager must consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
- There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

### **Following a criminal investigation or a prosecution.**

- The police should inform the LADO and the employer immediately when:
  - a criminal investigation and any subsequent trial is complete;
  - it is decided to close an investigation without charge; or,
  - it is decided not to continue to prosecute after the person has been charged.



- In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care should also inform that decision. The options will depend on the circumstances of the case and the consideration should take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

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

- If an allegation is determined to be unsubstantiated, unfounded, false or malicious, the LADO and the case manager should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.
- If a report is determined to be unsubstantiated, unfounded, false or malicious, the designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the school or college, should consider whether any disciplinary action is appropriate against the individual who made it as per their own behaviour policy.

#### **Returning to work**

- Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience.
- Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager should also consider how the person's contact with the child or children who made the allegation can best be managed if they are still attending the school or college. Managing the situation and exit arrangements Resignations and 'settlement agreements'.
- 'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action and both parties agree a form of words to be used in any future reference, should not be used, where there are allegations that indicate the person is a risk or poses a risk of harm to children or deemed not suitable to work with children. Such an agreement will not prevent a thorough police and/or school or college investigation where that is appropriate.
- Schools should not cease their investigations if the person leaves, resigns or ceases to provide their services. It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate.
- Wherever possible, the accused should be given full opportunity to answer the allegation and make representations about it. The process of recording the allegation and any supporting evidence and reaching a judgement about whether it can be substantiated or otherwise on the basis of all the information available, should continue even if the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is



complete, but it is important to reach and record an outcome wherever possible. The person concerned should be notified of the conclusion of the allegations and sanctions that might be posed.

- Other than where allegations are false, malicious, unsubstantiated, or unfounded, the outcome should be made clear when providing references to prospective employers. This is particularly important where the person moves into another position involving working with children.
- It is not appropriate to reach a settlement/compromise agreement if the person subject to the allegation resigns or their services cease to be used. However, in limited circumstances schools and colleges sometimes use settlement agreements to end the employment relationship on agreed terms, but not where there is an allegation that the individual poses a risk to children
- Where a settlement/compromise agreement is used, schools and colleges should not let it prevent the employer from:
  - fulfilling their legal duty to refer cases to the DBS where the referral criteria are met. Non-compliance of this duty is a criminal offence; or
  - providing a reference to potential employers when requested; or
  - considering whether to make a referral to the Teaching Regulations Agency where the criteria are met.

### **Record keeping**

- Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:
  - a clear and comprehensive summary of the allegation;
  - details of how the allegation was followed up and resolved;
  - a note of any action taken, and decisions reached and the outcome as categorised above;
  - a copy provided to the person concerned, where agreed by children's social care or the police; and,
  - a declaration on whether the information will be referred to in any future reference.
- The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.
- Schools and colleges have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry (further information can be found on the IICSA website). All other records should be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.
- The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention. This can be found on the ICO website :<https://ico.org.uk/>

### **References**

- Cases in which an allegation was found to be false, unfounded, unsubstantiated or malicious should not be included in employer references. Any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious should also not be included in any reference. Substantiated allegations should be included in references, provided that the information is factual and does not include opinions.

### **Learning lessons**

- Throughout the process in handling allegations and at conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school's procedures to help prevent similar events in the future. This should include issues arising from any decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.
- For all other cases the case manager should consider the facts and determine whether any improvements can be made.

### **Non recent allegations**

- Where an adult makes an allegation to a school or college that they were abused as a child, the individual should be advised to report the allegation to the police. Non recent allegations made by a child, should be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. Abuse can be reported no matter how long ago it happened.

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

- Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken. It is important that schools manage and record any such concerns and take appropriate action to safeguard children.

### **Low level concerns**

- As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.
- Creating a culture in which all concerns about adults (including allegations that do not meet the harms threshold (see Part Four - Section one KCSIE) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should encourage an open and transparent culture; enable schools and colleges to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school or college are clear about professional

boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

### **What is a low level concern?**

- The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out at paragraph 338 of KCSIE. 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 or college may have acted in a way that:
  - is inconsistent with the staff code of conduct (available in the staff handbook), including inappropriate conduct outside of work; and
  - does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.
- Examples of such behaviour could include, but are not limited to:
  - being over friendly with children;
  - having favourites;
  - taking photographs of children on their mobile phone;
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
  - using inappropriate sexualised, intimidating or offensive language.
- Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.
- It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE), are shared responsibly and with the right person, at this school the Principal and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings. Staff code of conduct and safeguarding policies.
- The governing body will ensure their staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school or college approach to dealing with any concerns.

Schools and colleges can achieve the purpose of their low-level concerns policy by, for example:

- ensuring their staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empowering staff to share any low-level safeguarding concerns as per paragraph;
- addressing unprofessional behaviour and supporting the individual to correct it at an early stage;
- providing a responsive, sensitive and proportionate handling of such concerns when they are raised; and,
- helping identify any weakness in the school or colleges safeguarding system.

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

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

- Schools should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, 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.

### **Recording low-level concerns**

- All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- These records must be kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).
- Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, the school or college should decide on a course of action, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school or college that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again.
- It is for schools and colleges to decide how long they retain such information, but it is recommended that it is retained at least until the individual leaves their employment.

### **References**

- Part three of this guidance is clear that schools and colleges should only provide substantiated safeguarding allegations in references. 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. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found to be substantiated, it should be referred to in a reference.

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

- If the concern has been raised via at school or via a third party, the headteacher/principal should collect as much evidence as possible by speaking:
  - directly to the person who raised the concern, unless it has been raised anonymously;
  - to the individual involved and any witnesses.

- The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.
- More detailed guidance and case studies on low-level concerns can be found in <https://www.farrer.co.uk/news-and-insights/developing-and-implementing-a-low-level-concerns-policy-a-guide-for-organisations-which-work-with-children/>

### 3. Whistleblowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so.
- All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues. The 'Raising Concerns at Work (Whistle-blowing Policy) for Schools' can be found in the Policy Folders situated outside the Executive Principal's office and is given to all staff during induction.

### 4. Physical Intervention

- Our policy on physical intervention by staff is set out separately, as part of our Behaviour Policy and also Use of Force by Staff Policy. The Use of Force by Staff Policy states that staff must only ever use physical intervention as a last resort, e.g. when a child is endangering him/herself or others and that, at all times it must be the minimal force necessary to prevent injury to another person. The majority of staff are trained in Team Teach<sup>3</sup> and are able to use de-escalation strategies that reduce risk and restraint. In circumstances when reasonable force might be a possibility due to very challenging behaviour of a pupil, individual plans would be put in place in order to minimise the likelihood of challenging behaviour occurring. These incidents are extremely rare in this school but when this does occur records are maintained.
- Good personal and professional relationships between staff and pupils are vital to ensure good order in our school. The Governing Body recognise that the majority of pupils in our school respond positively to the discipline and control practised by staff. This ensures the well-being and safety of all pupils and staff in school. However, the Governing Body acknowledge that in exceptional circumstances, staff may need to take action in situations where the use of reasonable, proportionate and necessary force may be required. The Executive Principal and SLT make every effort to ensure that all staff clearly understand their responsibilities in the context of their duty of care in taking appropriate measures where use of force is necessary and are provided with appropriate training (Team Teach)<sup>4</sup> to deal with these difficult situations. The staff has a clear and agreed policy on reasonable force.

<sup>3</sup> \*Team Teach aims: Through the promotion of de-escalation strategies and the reduction of risk and restraint, to support teaching, learning and caring, by increasing staff confidence and competence, in responding to behaviours that challenge, whilst promoting and protecting positive relationships. <http://www.teamteach.co.uk/>

## 5. Raising Awareness of this Policy

We will raise awareness of this policy via:

- Staff recruitment, induction, training and regular meetings
- The safeguarding leaflet given out to all visitors
- The Staff Handbook
- The school website
- Meetings with families
- Principal's Reports to Governors
- Information displays in the main entrance of the school

Designated Safeguarding Lead: - Mr Dave Rooney

Deputy Designated Safeguarding Leads: - Mrs Laura Denham  
Mrs Pauline Reid  
Miss Veronica Quinby  
Mrs Paula West

### **Related Policies:**

Anti-Bullying Policy	Whistleblowing Policy
Attendance Policy	Managing Allegations Policy
Behaviour Policy	Lettings Policy
Confidentiality Policy	Health & Safety Policy
Exclusion Policy	E-mail, Internet and E-Safety Policy
Single Equality Scheme and Disability Equality Scheme Policy (Inclusive of Accessibility Plan)	

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**The Governing Body approved this policy on the 10<sup>th</sup> September 2021 (updated in response to Covid19 Government Guidance on the 1<sup>st</sup> September 2021)**

Signed: Chair of Governors

Signed: Executive Principal

## APPENDIX 1

### ROLES & RESPONSIBILITIES

#### **The Governing Body**

The Governing Body are responsible for ensuring that the statutory guidance and legislation is followed. Our school has a link governor who visits the school regularly to liaise with the Designated Safeguarding Lead and to report back to the Governing Body.

The Governing Body must ensure the school meets the following key requirements:

- The Safeguarding policy, procedures and training are effective and comply with the law;
- The school contributes to inter-agency work, meeting statutory requirements;
- The school takes into account LSCB procedures and practice;
- There is a nominated governor to deal with any allegations of abuse made against the Executive Principal;
- There is a staff code of conduct which includes staff use of social media;
- That a senior member of staff is appointed to act as the Designated Safeguarding Lead;
- Consideration is given to how safeguarding is taught to students;
- Safer recruitment procedures, including appropriate use of reference checks on new staff and volunteers, are in place;
- There are procedures to deal with allegations of abuse against members of staff and volunteers;
- That any action taken is always in the best interest of the child and takes account of their wishes and feelings;
- That a Designated Teacher in charge of Children In Care is appointed;
- There are procedures in place to report children missing from education (see link <https://www.gov.uk/government/publications/children-missing-education> )

#### **The Principal**

The Principal is responsible for:

- Ensuring all policies and procedures are followed by staff;
- Ensuring all staff are appropriately trained in safeguarding procedures;
- Ensuring everyone connected to the school is aware of this policy;
- Ensuring the Designated Safeguarding Lead works in accordance with all legislation and guidance;
- Ensuring there is always cover for the role of Designated Safeguarding Lead;
- Ensuring adequate resources are provided for all staff to undertake their role in safeguarding children;
- Ensuring information in child protection files is kept confidentially and stores securely;
- Ensuring child protection files are transferred to new schools within 5 days for an in-year transfer or within 5 days of the start of a new term;
- Ensuring safe recruitment practices are in place and legislation is adhered to;
- Liaising and seeking advice from the Local Authority Designated Officer (LADO) when the need arises and provide a written record for any LADO referrals. The Executive Principal will always follow procedure and protocol as set out by the LADO.



### **The Designated Safeguarding Lead**

The Designated Safeguarding Lead(s) will meet the responsibilities outlined in Annex B of Keeping Children Safe in Education (Sep 2020) and follow the Berkshire LSCB Child Protection Procedures (as linked on page one of this policy)

Key points of the role of Designated Safeguarding Lead:

- Promptly refer all cases of suspected abuse to the relevant Local Authority Children's Social Care;
- Report any cases to the Police and DBS where appropriate;
- Liaise with the Executive Principal to keep them informed of any issues, especially ongoing enquiries under Section 47 of the Children's Act 1989, or police investigations;
- Act as a source of support, guidance and expertise on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies;
- Receive appropriate annual training and deliver this training to staff, volunteers, parents and governors as required;
- Understand the assessment process for providing early help and intervention, for example through locally agreed common and shared assessment processes such as Early Help Assessments;
- Have a working knowledge of how Local Authorities conduct Initial and Review Child Protection Conferences and be able to attend and contribute to these effectively when required to do so;
- Ensure each member of staff has access to, and understands the school's Safeguarding Policy and procedures, especially new and part time staff;
- Be alert to the specific needs of children in need, those with special educational needs and young carers;
- Be able to keep detailed, accurate, secure electronic records of concerns and referrals;
- Obtain access to resources and attend any relevant or refresher training courses;
- Encourage a culture of listening to children and taking account of their wishes and feelings among all staff, in any measures the school may put in place to protect them;
- Ensuring the school's policies are known and used appropriately;
- Work with the Governing Board to ensure that the school's Safeguarding Policy is reviewed annually and the procedures and implementation are updated and reviewed regularly;
- Ensuring the Safeguarding Policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school in this;
- Promote supportive engagement with parents/carers.
- Link with the local LSCB to make sure staff are aware of training opportunities and the latest local policies on safeguarding;
- Where children leave the school, ensure their Safeguarding file is transferred to the new school or college as soon as possible or within 5 days for an in-year transfer and within 5 days of the start of a new term. This should be transferred separately from the main student file, ensuring secure transit and confirmation of receipt should be obtained.

In addition to this they will:

- Seek advice when there is any uncertainty regarding a concern about a child or vulnerable adult;
- Consider any measures to be put in place to protect the student following an allegation of abuse;
- Only disclose personal information about a student to other members of staff on a need to know basis;
- Ensuring that electronic records are kept up to date with brief entry of concerns and actions to provide a chronology;
- Ensure that an indication of further record-keeping is marked on the student records;
- Provide prompt written reports when required by any agency in connection with safeguarding;
- Attend (or delegate this requirement to another appropriately informed member of staff) family support meetings, core groups, or other multi-agency planning meetings;
- Ensure that any student currently on a Child Protection Plan, who is absent without explanation, is referred to their Social Worker at the Local Authority;

- Ensure where there is an allegation of abuse by a student to another student that both students are considered as vulnerable and in need of consideration for action to be taken; referral for each student would be made, with all relevant parental and agency communication;
- Ensure that all school staff know how to recognise and refer any concerns;
- Take a lead responsibility for online safety across the school;
- Work with mental health leads where safeguarding concerns are linked to mental health;
- Lead in promoting educational outcomes of children in need by knowing and helping to address issues they're experiencing or have experienced, by:
  - Ensuring we know who this cohort are and understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort;
  - Supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker to reach their potential.
- Ensure annual training is provided for all staff and themselves undertake annual training, or in RBWM three twilight update sessions per year.

### **All Staff and Volunteers**

Safeguarding is everyone's responsibility as outlined in Keeping Children Safe in Education (Sep 2020). All staff are expected to fulfil the following duties as part of their role:

- Confirm in writing they have read and understood this policy and Keeping Children Safe in Education Part 1 and adhere to the guidance/instructions;
- Wear the appropriately colour coded lanyard whilst in school to facilitate easy recognition of visitors to school and those who have not received a DBS clearance;
- Be aware that they have a professional responsibility to keep safeguarding information confidential and also that we must share information with other agencies in order to safeguard children;
- Attend regular safeguarding training on reporting procedures, identifying signs of abuse and the effects of it;
- Highlight to senior staff and the safeguarding team if they do not understand the policy and procedure around safeguarding;
- Recognise that Safeguarding is their main responsibility and treat children's welfare with utmost importance and promote a zero tolerance approach to abuse in the school;
- Report promptly any concerns of potential abuse,
- Be alert at all times to the signs of abuse, namely physical, emotional, sexual or neglect;
- Take notes and complete a concern form regarding any concerning remarks or marks on a child and pass directly to the DSL;
- Establish and maintain an environment where children feel safe to talk and where school personnel listen to children;
- Provide opportunities through the curriculum to address relevant issues and topics in order to promote their safety and well-being and encourage students to assess risks to themselves;
- Know what to do if a child makes a disclosure and not promise confidentiality to any child, but always act in the interests of a child;
- Keep up to date with changes in procedures;
- Ensure that they conduct themselves correctly at all times and do not put themselves at risk;
- Take every opportunity to preserve dignity when dealing with children;
- Provide privacy for manual handling and intimate care treatments;
- Report any concerns they have on any aspect of the school community;
- Alert a line manager or a member of the SLT if they feel a person or school practice is placing pupils at risk

Designated Safeguarding Lead:

Mr Dave Rooney

Deputy Designated Safeguarding Leads:

Mrs Laura Denham

Mrs Pauline Reid

Mrs Paula West

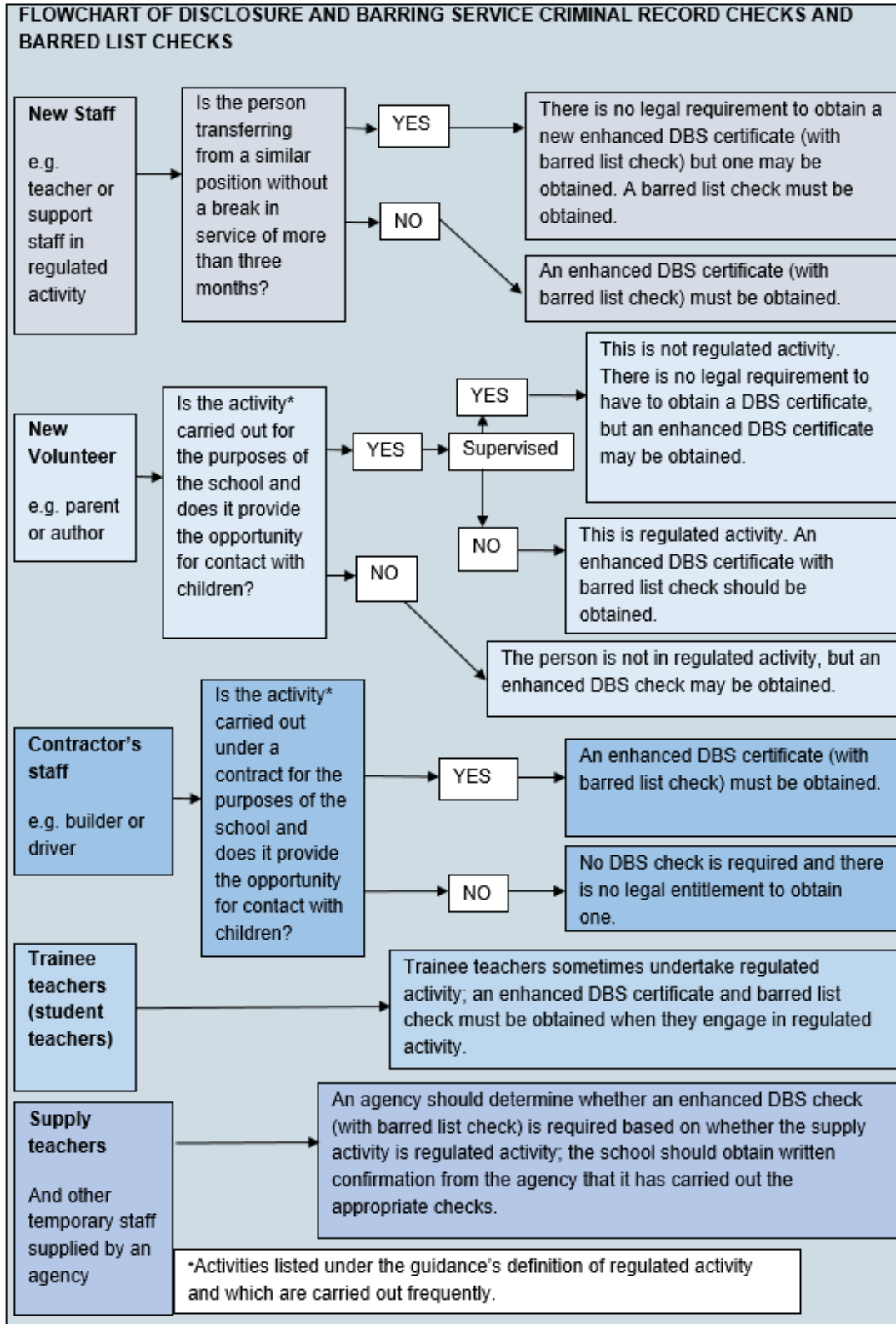
Miss Veronica Quinby

Designated Safeguarding Governor:

Ms Dominique Du Pre

## APPENDIX 2

### Procedures when there are concerns about a child



## APPENDIX 3

### List of Web Filtering Categories

Categories				
Category ^	Block	Flag	Description	Edit
Abortion	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that discuss abortion from a historical, medical, legal, or other not overtly biased point of view.	
Abortion - Pro Choice	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that push the pro-choice viewpoint or otherwise overtly encourage abortions.	
Abortion - Pro Life	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that condemn abortion or otherwise overtly push a pro-life agenda.	
Advocacy Groups & Trade Associations	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to industry trade groups, lobbyists, unions, special interest groups, professional organizations and other associations comprised of members wi...	
Agriculture	<input type="checkbox"/>	<input type="checkbox"/>	Web pages devoted to the science, art, and business of cultivating soil, producing crops, raising livestock, and products, services, tips, tricks, etc. related to farming.	
Alcohol	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that promote, advocate or sell alcohol including beer, wine and hard liquor.	
Anonymizer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that promote proxies and anonymizers for surfing websites with the intent of circumventing filters.	
Architecture & Construction	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which involve construction, contractors, structural design, architecture and all businesses or services related to the design, building or engineering of str...	
Arts	<input type="checkbox"/>	<input type="checkbox"/>	Web pages related to the development or display of the visual arts.	
Astrology & Horoscopes	<input type="checkbox"/>	<input type="checkbox"/>	Web pages related to astrology, horoscopes, divination according to the stars, or the zodiac.	
Atheism & Agnosticism	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that pursue an anti-religion agenda or that challenge religious, spiritual, metaphysical, or supernatural beliefs.	
Auctions & Marketplaces	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages devoted to person to person selling or trading of goods and services through classifieds, online auctions, or other means not including "traditional" online ...	
Banking	<input type="checkbox"/>	<input type="checkbox"/>	Web pages operated by or all about banks and credit unions, particularly online banking web applications, but excludes online brokerages.	
Biotechnology	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which include genetics research, biotechnology firms and research institutions.	
Botnet	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages or compromised web servers running software that is used by hackers to send spam, phishing attacks and denial of service attacks.	
Businesses & Services (General)	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that include Businesses and Services, generally used unless there is a more specific category that better describes the actual business or service.	
Cartoons, Anime & Comic Books	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to animated TV shows and movies or to comic books and graphic novels.	
Catalogs	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that have product listings and catalogs but do not have an online shopping option.	
Fitness & Recreation	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with tips and information on fitness or recreational activities.	
Food & Restaurants	<input type="checkbox"/>	<input type="checkbox"/>	Web pages related to food from restaurants and dining, to cooking and recipes.	
Gambling	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which promote gambling, lotteries, casinos and betting agencies involving chance.	
Games	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages consisting of computer games, game producers and online gaming.	
Gay, Lesbian or Bisexual	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that cater to or discuss the gay, lesbian, bisexual or transgender lifestyle.	
Government Sponsored	<input type="checkbox"/>	<input type="checkbox"/>	Web pages devoted to Government organizations, departments, or agencies. Includes police, fire (when employed by a city), elections commissions, elected represe...	
Hacking	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages with information or tools specifically intended to assist in online crime such as the unauthorized access to computers, but also pages with tools and inform...	
Hate Speech	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that promote extreme right/left wing groups, sexism, racism, religious hate and other discrimination.	
Health & Medical	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to personal health, medical services, medical equipment, procedures, mental health, finding and researching doctors, hospitals and clinics.	
Hobbies & Leisure	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which include tips and information about crafts, and hobbies such as sewing, stamp collecting, model airplane building, etc.	
Home & Office Furnishings	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that include furniture makers, retail furniture outlets, desks, couches, chairs, cabinets, etc.	
Home, Garden & Family	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which cover activities in the home and pertaining to the family. Includes tips and information about parenting, interior decorating, gardening, cleaning, f...	
Humor	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which include comics, jokes and other humorous content.	
Illegal Drugs	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that promote the use or information of common illegal drugs and the misuse of prescription drugs and compounds.	
Image Search	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages and internet search engines used to search pictures and photos found across the Internet where the returned results include thumbnails of the found im...	
Information Security	<input type="checkbox"/>	<input type="checkbox"/>	Web pages and companies that provide computer and network security services, hardware, software or information.	
Instant Messenger	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Instant messaging software and web pages that typically involve staying in touch with a list of "buddies" via messaging services.	
Insurance	<input type="checkbox"/>	<input type="checkbox"/>	Web pages the cover any type of insurance, insurance company, or government insurance program from Medicare to car insurance to life insurance.	

Internet Phone & VOIP	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that allow users to make calls via the web or to download software that allows users to make calls over the Internet.	
Job Search	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages devoted to job searches or agencies, career planning and human resources.	
Kid's Pages	<input type="checkbox"/>	<input type="checkbox"/>	Web pages specifically intended for young children (under 10) including entertainment, games, and recreational pages built with young children in mind.	
Legislation, Politics & Law	<input type="checkbox"/>	<input type="checkbox"/>	Web pages covering legislation, the legislative process, politics, political parties, elections, elected officials and opinions on these topics.	
Lingerie, Suggestive & Pinup	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that refer specifically to photos and videos where the person who is the subject of the photo is wearing sexually provocative clothing such as lingerie.	
Literature & Books	<input type="checkbox"/>	<input type="checkbox"/>	Web pages for published writings including fiction and non-fiction novels, poems and biographies.	
Login Screens	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which are used to login to a wide variety of services where the actual service is not known, but could be any of several categories (e.g. Yahoo and Googl...	
Malware Call-Home	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages identified as spyware which report information back to a particular URL.	
Malware Distribution Point	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that host viruses, exploits, and other malware.	
Manufacturing	<input type="checkbox"/>	<input type="checkbox"/>	Web pages devoted to businesses involved in manufacturing and industrial production.	
Marijuana	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages about the plant or about smoking the marijuana plant. Includes web pages on legalizing marijuana and using marijuana for medicinal purposes, marijuana ...	
Marketing Services	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to advertising agencies and other marketing services that don't include online banner ads.	
Military	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages sponsored by the armed forces and government controlled agencies.	
Miscellaneous	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that do not clearly fall into any other category.	
Mobile Phones	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which contain content for Mobile phone manufacturers and mobile phone companies' websites. Also includes sites that sell mobile phones and accessories.	
Motorized Vehicles	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which contain information about motorized vehicles including selling, promotion, or discussion. Includes motorized vehicle manufacturers and sites dedicat...	
Music	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that include internet radio and streaming media, musicians, bands, MP3 and media downloads.	
Nature & Conservation	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with information on environmental issues, sustainable living, ecology, nature and the environment.	
News	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with general news information such as newspapers and magazines.	
No Content Found	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which contain no discernable content which can be used for classification purposes.	
Non-traditional Religion & Occult	<input type="checkbox"/>	<input type="checkbox"/>	Web pages for religions outside of the mainstream or not in the top ten religions practiced in the world. Also includes occult and supernatural, extraterrestrial, folk rel...	
Nudity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that display full or partial nudity with no sexual references or intent.	
Nutrition & Diet	<input type="checkbox"/>	<input type="checkbox"/>	Web pages on losing weight and eating healthy, diet plans, weight loss programs and food allergies.	
Online Ads	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Companies, web pages, and sites responsible for hosting online advertisements including advertising graphics, banners, and pop-up content. Also includes web page...	
Online Financial Tools & Quotes	<input type="checkbox"/>	<input type="checkbox"/>	Web pages for investment quotes, online portfolio tracking, financial calculation tools such as mortgage calculators, online tax preparation software, online bill paym...	
Online Information Management	<input type="checkbox"/>	<input type="checkbox"/>	Web pages devoted to online personal information managers such as web applications that manage to-do lists, calendars, address books, etc.	
Online Shopping	<input type="checkbox"/>	<input type="checkbox"/>	Websites and web pages that provide a means to purchase online.	
Online Stock Trading	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Investment brokerage web pages that allow online trading of stocks, mutual funds and other securities.	
Parked	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that have been purchased to reserve the name but do not have any real content.	
Parks, Rec Facilities & Gyms	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which include parks and other areas designated for recreational activities such as swimming, skateboarding, rock climbing, as well as for non-professional ...	
Pay To Surf	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web sites that offer cash to users who install their software which displays ads and tracks browsing habits effectively allowing users to be paid while surfing the web.	
Peer-to-Peer	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that provide peer-to-peer (P2P) file sharing software.	
Personal Pages & Blogs	<input type="checkbox"/>	<input type="checkbox"/>	Web pages including blogs, or a format for individuals to share news, opinions, and information about themselves. Also includes personal web pages about an individ...	
Personal Storage	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web sites used for remote storage of files, sharing of large files, and remote Internet backups.	
Pets & Animals	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with information or products and services for pets and other animals including birds, fish, and insects.	
Pharmacy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which include prescribed medications and information about approved drugs and their medical use.	



Philanthropic Organizations	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with information regarding charities and other non-profit philanthropic organizations and foundations dedicated to altruistic activities.	
Phishing/Fraud	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Manipulated web pages and emails used for fraudulent purposes, also known as phishing.	
Photo Sharing	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that host digital photographs or allow users to upload, search, and exchange photos and images online.	
Physical Security	<input type="checkbox"/>	<input type="checkbox"/>	Web pages devoted to businesses and services related to security products or other security aspects excluding computer security.	
Piracy & Copyright Theft	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that provide access to illegally obtained files such as pirated software (aka warez), pirated movies, pirated music, etc.	
Pornography	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which contain images or videos depicting sexual acts, sexual arousal, or explicit nude imagery intended to be sexual in nature.	
Portal Sites	<input type="checkbox"/>	<input type="checkbox"/>	General web pages with customized personal portals, including white/yellow pages.	
Private IP Address	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages for Private IP addresses are those reserved for use internally in corporations or homes.	
Product Reviews & Price Comparisons	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to helping consumers comparison shop or choose products or stores, but don't offer online purchasing options.	
Profanity	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that use either frequent profanity or serious profanity.	
Professional Networking	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Social networking web pages intended for professionals and business relationship building.	
R-Rated	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages whose primary purpose and majority of content is child appropriate, but who have regular or irregular sections of the site with sexually themed, non-edu...	
Real Estate	<input type="checkbox"/>	<input type="checkbox"/>	Web pages possessing information about renting, purchasing, selling or financing real estate including homes, apartments, office space, etc.	
Redirect	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that redirect to other pages on other web sites.	
Reference Materials & Maps	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which contain reference materials and are specific to data compilations and reference shelf material such as atlases, dictionaries, encyclopedias, census ...	
Religions	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which cover main-stream popular religions world-wide as well as general religion topics and theology.	
Remote Access	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that provide remote access to private computers or networks, internal network file shares, and internal web applications.	
Retirement Homes & Assisted Living	<input type="checkbox"/>	<input type="checkbox"/>	Web pages containing information on retirement homes and communities including nursing care and hospice care.	
School Cheating	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that contain test answers, pre-written term papers and essays, full math problem solvers that show the work and similar web sites that can be used to c...	
Search Engines	<input type="checkbox"/>	<input type="checkbox"/>	Web pages supporting the searching of web, newsgroups, pictures, directories, and other online content.	
Self-help & Addiction	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages which include sites with information and help on gambling, drug, and alcohol addiction as well as sites helping with eating disorders such as anorexia, buli...	
Sex & Erotic	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages with sexual content or products or services related to sex, but without nudity or other explicit pictures on the page.	
Sex Education & Pregnancy	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages with educational materials and clinical explanations of sex, safe sex, birth control, pregnancy, and similar topics aimed at teens and children.	
Shipping & Logistics	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that promote management of inventory including transportation, warehousing, distribution, storage, order fulfillment and shipping.	
Social Networking	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Social networking web pages and online communities built around communities of people where users "connect" to other users.	
Social and Affiliation Organizations	<input type="checkbox"/>	<input type="checkbox"/>	Web pages built around communities of people where users "connect" to other users.	
Software, Hardware & Electronics	<input type="checkbox"/>	<input type="checkbox"/>	Web pages with information about or makers of computer equipment, computer software, hardware, peripherals, data networks, computer services and electronics.	
Spam	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Products and web pages promoted through spam techniques.	
Sport Fighting	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages dedicated to training and contests involving fighting disciplines and multi-person combat sports such as martial arts, boxing, wrestling, and fencing.	
Sport Hunting	<input type="checkbox"/>	<input type="checkbox"/>	Web pages covering recreational hunting of live animals.	
Sports	<input type="checkbox"/>	<input type="checkbox"/>	Web pages covering competitive sports in which multiple people or teams compete in both athletic (e.g. football) and non-athletic competitions (e.g. billiards).	
Spyware & Questionable Software	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages containing software that reports information back to a central server such as spyware or keystroke loggers.	
Streaming & Downloadable Audio	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages with repositories of music or that provide streaming music or other audio files that may pose a bandwidth risk to companies.	
Streaming & Downloadable Video	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages with repositories of videos or that provide in-browser streaming videos that may pose a bandwidth risk to companies.	
Supplements & Compounds	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages containing information on vitamins and other over-the-counter unregulated supplements and compounds.	
Swimsuits	<input type="checkbox"/>	<input type="checkbox"/>	Web pages containing pictures of people wearing swimsuits. Does not include pictures of swimsuits on manikins or by themselves.	
Technology (General)	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which include web design, internet standards (such as RFCs), protocol specifications, and other broad technology discussions or news.	
Television & Movies	<input type="checkbox"/>	<input type="checkbox"/>	Web pages about television shows and movies including reviews, show times, plot summaries, discussions, teasers, marketing sites, etc.	
Text Messaging & SMS	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages used to send or receive simple message service (SMS) text messages between a web page and a mobile phone.	
Tobacco	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages promoting the use of tobacco related products (cigarettes, cigars, pipes).	
Torrent Repository	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that host repositories of torrent files, which are the instruction file for allowing a bit torrent client to download large files from peers.	
Toys	<input type="checkbox"/>	<input type="checkbox"/>	Web pages dedicated to manufacturers of toys, including toy selling or marketing sites.	
Translator	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which translate languages from one to another.	
Travel	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which provide travel and tourism information, online booking or travel services such as airlines, car rentals, and hotels.	
Unreachable	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that give an error such as, "Network Timeout", "The server at example.com is taking too long to respond," or "Address Not Found".	
Violence	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that promote questionable activities such as violence and militancy.	
Weapons	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>	Web pages that include guns and weapons when not used in a violent manner.	
Web Hosting, ISP & Telco	<input type="checkbox"/>	<input type="checkbox"/>	Web pages for web hosting and blog hosting sites, Internet Service Providers (ISPs) and telecommunications (phone) companies.	
Web-based Email	<input type="checkbox"/>	<input type="checkbox"/>	Web pages which enable users to send and/or receive email through a web accessible email account.	
Web-based Greeting Cards	<input type="checkbox"/>	<input type="checkbox"/>	Web pages that allow users to send or receive online greeting cards.	
Wikis	<input type="checkbox"/>	<input type="checkbox"/>	Web pages or websites in which a community maintains a set of informational documents where anyone in the community can update the content.	



We will ensure that our monitoring strategy meets the following principles:

Content	
Age appropriate	Includes the ability to implement variable monitoring appropriate to age. This will in turn define which alerts are prioritised and responded to.
Data retention	User accounts are disabled once pupils have left the school
Monitoring Policy (E-mail, E-Safety and Internet Policy)	Pupils are routinely reminded that their online access is monitored. They are taught about on-line safety and to behave appropriately and responsibly.
Impact	Key Network review regularly and monitor the impact of the systems. Weekly E-mails are sent to the school. Serious breaches are notified immediately.
Prioritisation (How alerts are generated and prioritised to enable rapid response)	Key Networks send an automated E-Mail alerting web traffic events that violate our policy. They would inform us immediately if there was a serious breach e.g. multiple attempts to access an inappropriate website by a single user.
Reporting	Weekly E-Mail to Pauline Reid (School Business Manager)/ Laura Denham (Deputy Head Teacher), Raman Herr

## APPENDIX 4

### Disclosure/Reporting Procedures at Lowbrook Academy

All staff have a responsibility to create and maintain a safe learning environment for all children. We have a responsibility to identify where there are child welfare concerns and take action to address them in partnership with other organisations.

The Education Act 2002 – Section 175 states that ‘it is a duty of all LAs and schools to make arrangements to safeguard and promote the welfare of all children.’

- As a member of staff, you have a legal responsibility to report any concerns you have regarding safeguarding or any disclosures made by a child or young person.
- You are also responsible for ensuring that action has been taken as a result of your concerns.
- Recording of all concerns/incidents must be followed up in writing.

Section 5B of the 2003 FGM Act (Female Genital Mutilation) requires teachers in England and Wales to report known cases of FGM in under 18s which they identify in the course of their professional work to the police. The duty came into force on 31 October 2015.

**Mr Rooney (Executive Principal) is the Designated Safeguarding Lead (DSL).**

**Mrs Reid, Mrs Quinby, Mrs Denham and Mrs West are Deputy Designated Safeguarding Officers.**

Protocol for Reporting Safeguarding Concerns:

- You should report to the DSL if you have any concerns about the welfare of a child
- **The DSL will then decide on the appropriate course of action**
- Written records of these concerns are essential and should be treated as confidential.
- All confidential files are held in a locked filing cabinet in the Executive Principal’s office.

The Four Categories of Abuse: Physical, Sexual, Emotional and Neglect.

Protocol for Reporting Disclosures or Serious Concerns of Abuse

- Report any concerns to the DSL **immediately** and then follow this up in writing.
- Disclosures from a young person are confidential but if any of the content has a safeguarding concern you should inform the pupil that you will need to tell someone else.
- Reassure them that you will only tell who needs to be told.

Disclosure - What to do:

- Stay calm, tell the child they have done the right thing
- Be honest, do not make promises you cannot keep – **YOU HAVE A DUTY TO REFER**
- Explain what you have to do next and to whom you have to talk to
- Acknowledge how hard it must have been for the child to tell you what happened.

Disclosure - What not to do:

- Do not ask leading questions
- Do not promise not to tell anyone

- Do not put words into a child's mouth or assume how the child feels.
- Do not attempt to interview the child.

#### Record Keeping

- All incidents should be recorded in writing and dated and signed using the Recording Form for Safeguarding Concerns (Appendix 5)
- Child's name
- Age of the child and date of birth
- Date and time of the observation or the disclosure
- Exact words spoken by the child
- Exact position and type of injuries or marks seen, if appropriate
- Exact observation of an incident including any other witnesses
- Name of the person to whom the concern was reported, with date and time; and the names of any other person present at the time.
- Any discussion held with the parent(s) (where deemed appropriate)
- Any relevant Significant Observation sheets should be attached to the record

#### Records should:

- Be completed immediately and no longer than 24 hours after the incident / disclosure
- Be accurate and descriptive. Do NOT make any assumptions.
- Be clear and concise
- Be hand written in PEN and signed
- Be initiated on Recording Form for Safeguarding Concerns (Appendix 5).

### The immediate response to a report Responding to the report.

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or college staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they should act on them immediately rather than wait to be told.

The school's initial response to a report from a child is incredibly important. How the school responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe.

Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. All staff should be trained to manage a report. Local policies (and training) will dictate exactly how reports should be managed via RBWM Mash Reporting Procedures. However, effective safeguarding practice includes:

- **Managing reports** with two members of staff present is preferable, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible;
  - where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and ***UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people***. The key consideration is for staff **not** to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection;
  - not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff should only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to;
  - recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They should be supportive and respectful of the child;
  - recognising 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 and so children may not be able to recall all details or timeline of abuse;
  - keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation;
  - listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was;

- considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;
- only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Schools and colleges should be aware that notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation; and
- informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.

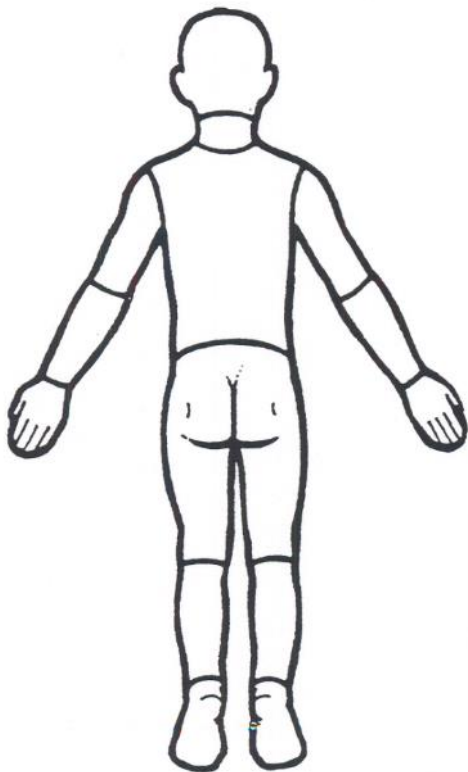
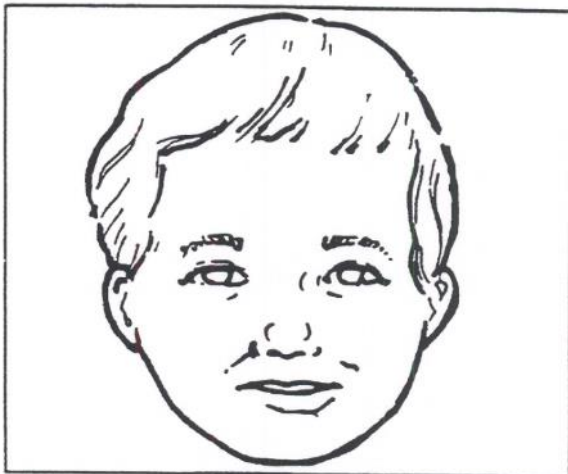
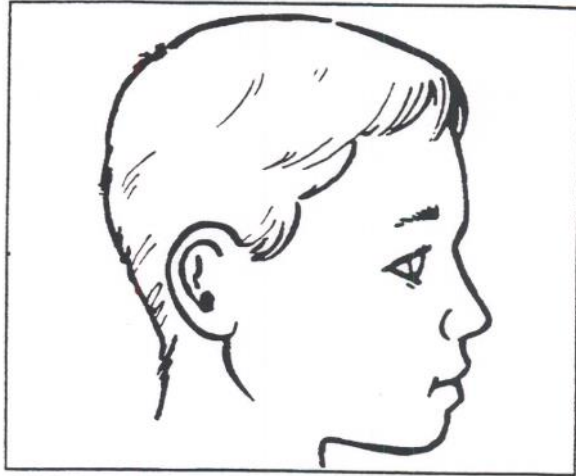
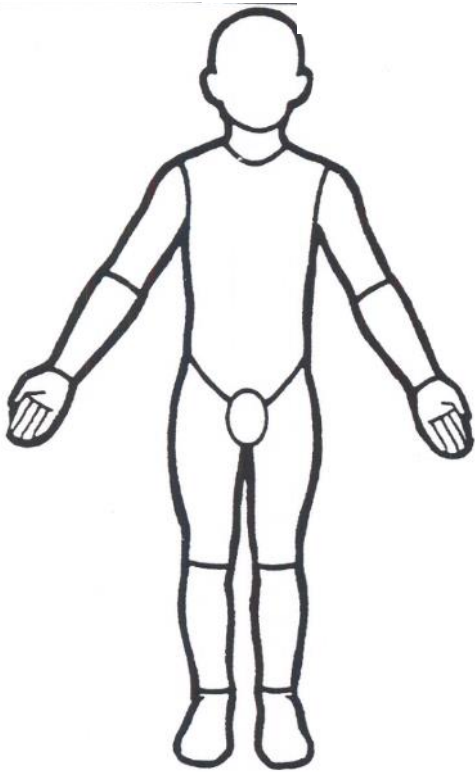


### Recording Form for Safeguarding Concerns

Staff are required to complete this form and pass it to **[Dave Rooney or a Deputy DSL]** if they have a safeguarding concern about a child in our school.

Full name of child	Date of Birth	Class	Your name and position in school

<b>Nature of concern/disclosure : S-P-E-N</b>	
Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.	
Time & date of incident:	
Was there an injury? Yes / No	Did you see it? Yes / No
Describe the injury/Incident:	
Was anyone else with you? Who?	
Has this happened before?	Did you report the previous incident?
Who are you passing this information to? Name:	
Position:	
<b>Your signature:</b> <b>Time form completed:</b> <b>Date:</b>	





## APPENDIX 6

### Prevent Duty Risk Assessment/Action Plan

Lowbrook Academy recognises that it has a duty under Section 26 of the Counter-Terrorism and Security Act, 2015, in the exercise of its functions, to have due regard to the need to prevent people from being drawn into terrorism.

Duty	What this Means	Action	By Whom
Risk Assessment			
Assess the risk of children being drawn into terrorism.	<u>Leadership:</u> Executive Principal, Governors and SLT have a good understanding of their own and The Academy's responsibilities in relation to the Prevent Duty?	Governors have been given Prevent Training by Prevent Lead, Mr Rooney. SLT have been given Prevent Training by Prevent Lead. Update given to all staff by Prevent Lead. Pauline Reid (Deputy Designated Safeguarding Lead) is a Home Office Accredited Prevent Trainer. WRAP Training by Misha Upadhyaya, Prevent Officer, Thames Valley Police.	Executive Principal. Prevent Lead.  Ongoing
	<u>Partnership:</u> The Academy has an identified single point of contact (SPOC) in relation to Prevent.	Mr Rooney responsible for overseeing of the Prevent Action Plan & updating SLT and Governors.	Prevent Lead.
	Staff can demonstrate a general understanding of the risks affecting children and young people.	All staff have copies of Keeping Children Safe in Education. All Staff have been trained by Prevent Lead. All have been informed of their duties as set out in The Prevent Duty (DfE, June 2015).	Prevent Lead.
	Staff can identify individual children who may be at risk of radicalisation and how to support them.	The Prevent Lead has informed staff about signs and indicators of radicalisation in Prevent Training.	Prevent Lead.
	There is a clear procedure in place for protecting children at risk of radicalisation.	All staff have read the Safeguarding Policy which includes a statement regarding the school's Prevent duty.	Prevent Lead.

		All staff understand how to record and report concerns regarding risk of radicalisation.	
	The school has identified a Prevent Lead.	All staff know who the Prevent Lead is and that they act as a source of advice and support. (D. Rooney)	Prevent Lead.
Prohibit extremist speakers and events in the school.	The school exercises 'due diligence' in relation to requests from external speakers and organisations using school premises.	Speakers are selected by the School and any request is subject to the Executive Principal's approval. Request an outline of what the speaker intends to cover Research the person/organisation to establish whether they have demonstrated extreme views/actions. All events including charity events are approved by the Executive Principal and SLT. Deny permission for people/organisations to use school premises if they have links to extreme groups or movements.	Executive Principal SLT
Working in Partnership			
The school is using existing local partnership arrangements in exercising its Prevent Duty.	Staff record and report concerns in line with existing policies and procedures	All staff have been trained in Safeguarding and Prevent and understand how to register concerns with the Prevent Lead. All contribute to Significant Observations Folder if necessary.	SDPs Prevent Lead.
	The Prevent Lead makes appropriate referrals to other agencies including the Multi-Agency Safeguarding Hub (MASH) and Channel Panel.	RBWM is not considered a High Risk LA. The Prevent Lead is familiar with both Local Authority and Police Prevent Leads.( Misha Upadhyaya Prevent Officer, Thames Valley Police - 01753 506291, Internal: 731 6291, Mobile: 07467 444183 <a href="mailto:misha.upadhyaya@thamesvalley.pnn.police.uk">misha.upadhyaya@thamesvalley.pnn.police.uk</a> Prevent Office , Slough Police Station, Windsor Road   Slough   SL1 2HH	Prevent Lead.

		<p>Website: <a href="http://www.thamesvalley.police.uk">www.thamesvalley.police.uk</a>. Non Emergency Contact Number: 101</p> <p>Records of any referrals are kept in a locked cabinet in the Executive Principal's Office.</p>	
Staff training			
Equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas.	Assess the training needs of staff in the light of the school's assessment of the risk to pupils at the school of being drawn into terrorism.	<p>Pauline Reid (Deputy Designated Safeguarding Leads) is a Home Office Accredited Prevent Trainer. WRAP Training by Misha Upadhyaya, Prevent Officer, Thames Valley Police.</p> <p>Prevent Lead has trained all Teaching Staff, Teaching Assistants, Governors and Wrap- Around Care Staff. Staff Safeguarding and Prevent Training register is stored in the Single Central Record.</p>	Prevent Lead.
	<p>All staff have sufficient knowledge and confidence to:</p> <ol style="list-style-type: none"> <li>1. Exemplify British Values in their management, teaching and through general behaviours in the institution</li> <li>2. understand the factors that make people vulnerable to being drawn into terrorism and to challenge extremist ideas which are used by terrorist groups and can purport to legitimise terrorism</li> <li>3. Have sufficient training to be able to recognise this vulnerability and be aware of what action to take in response.</li> </ol>	<p>Prevent Lead has trained all Teaching Staff, Teaching Assistants and Governors.</p> <p>The importance of British Values is included in the training. All classrooms have a British Values Display and British Values are routinely exemplified throughout the Academy's practise and are well embedded. Our Citizenship and Ethics Curriculum reflects British Values. Weekly Assemblies are also themed around British Values.</p> <p>All Wrap-Around Care Staff have also been trained.</p> <p>All Parent Volunteers have been trained as part of Safe Guarding Training</p> <p>All staff have been trained in the Academy's procedures.</p>	Prevent Lead.

IT Policies			
Ensure that children are safe from terrorist and extremist material when accessing the internet in school.	The Academy has policies in place which make reference to the Prevent Duty.	Safeguarding Policy, E-mail, Internet and E-Safety Policies both refer to Prevent Duty.	Prevent Lead. SLT
	The Academy employs filtering/firewall systems to prevent staff/ students/ visitors from accessing extremist websites and material. The system alerts to serious and/or repeated breaches or attempted breaches of the policy.	Firewall Manufacturer <a href="http://www.Smoothwall.com">www.Smoothwall.com</a> , managed by Key Networks. Automatic E-mails provided by Microsoft and managed by Key Networks sent to school on weekly basis notifying of alerts and security breaches. Key Networks send an automated weekly E- Mail to D. Rooney (Executive Principal, Designated Safeguarding Lead), P. Reid (School Business Manager, Deputy Designated Safeguarding Lead), and Raman Herr (ICT Lead) alerting the Academy to web traffic events that violate our policy. (E-mails provided by Microsoft and managed by Key Networks). Key Networks would inform us immediately if there was a serious breach e.g. multiple attempts to access an inappropriate website by a single user. Patrick Carthew, IT Consultant, Key Network Services Ltd, T: 0345 3096090 F: 0345 3096091 E: <a href="mailto:patrick.carthew@knws.co.uk">patrick.carthew@knws.co.uk</a>	SLT Key Networks P. Reid R. Herr D. Rooney
	Children are taught about on-line safety with specific reference to the risk of radicalisation.	The curriculum reflects this duty. All staff routinely teach and remind children about on-line Safety. Classrooms have On-Line Safety displays.	All Staff
Building children's resilience to radicalisation			
	There adequate arrangements and resources in place to provide	Circle times are timetabled weekly and children have the opportunity to share and discuss issues. All TAs	All Staff

	pastoral care and support as required.	<p>have received Circle Time training and are experienced in supporting children.</p> <p>N. Ivey, TA, is ELSA trained and runs Social Groups with children identified by Class Teachers; this is also monitored by the SENDCO/Head of School (F. Garland &amp; R. Quinby.)</p> <p>Class teachers carefully monitor welfare of pupils; Significant Observation notes are kept in Assessment Folders.</p> <p>Children are discussed regularly in Team Meetings and SLT Meetings.</p>	
Ensure that pupils have a safe environment in which to discuss controversial issues.	Pupils develop the knowledge, skills and understanding to prepare them to play a full and active part in society.	<p>Through Citizenship and Ethics, Faith and Belief and other curriculum activities, pupils are able to explore political, religious and social issues.</p> <p>Pupils are taught about the diverse national, regional and ethnic identities in the UK and the need for mutual respect.</p> <p>Staff are aware of the government guidance: <a href="https://www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published/">https://www.gov.uk/government/news/guidance-on-promoting-british-values-in-schools-published/</a> as part of their Prevent Training.</p>	All Staff
<b>Site Security</b>			
Ensure that the Academy manages the access of all visitors to the site.	There are effective arrangements in place to manage access to the campus by visitors and non-students/staff.	<p>All external doors are locked; playground gates are locked. Entry to the school by Front Door via buzzer Security System.</p> <p>All visitors to site are signed in and out by Office Staff.</p> <p>All visitors wear Visitor ID Badges.</p> <p>All visitors to the site are DBS checked.</p>	All Staff

		The Single Central Record contains details of all staff, Governors and Volunteers DBS checks and Safeguarding Training.	
	<u>Incident Management:</u> The Academy has a critical incident management plan which is capable of dealing terrorist related issues.	We have a School Emergency Plan for On- Site and Off-Site Incidents.	
Safeguarding			
Protection against the risk of radicalisation and extremism is included within Safeguarding and other relevant policies.		Protection against the risk of radicalisation and extremism and The Prevent Duty is included within Safeguarding Policy. DSLs receive additional and ongoing training to enable the effective understanding and handling of referrals relating to radicalisation and extremism.	SDP Prevent Lead

References: Keeping Children Safe in Education: Information for all school and college staff” DfE, September 2018

“The Prevent Duty: Departmental advice for schools and childcare providers”, DfE, June 2015

APPENDIX 7





## **Child on Child Abuse-Procedures**

### **Action taken by staff**

As with all Child Protection and Safeguarding issues staff should follow the procedures laid down in this policy and should speak to the DSL, Dave Rooney, as soon as possible.

Although the type of abuse may have a varying effect on the victim and initiator of the harm, these simple steps can help clarify the situation and establish the facts before deciding the consequences for those involved in perpetrating harm.

It is important to deal with a situation of peer abuse immediately and sensitively. It is necessary to gather the information as soon as possible to get the true facts around what has occurred as soon after the child(ren) may have forgotten. It is equally important to deal with it sensitively and think about the language used and the impact of that language on both the children and the parents when they become involved. For example; do not use the word perpetrator, this can quickly create a 'blame' culture and leave a child labelled.

Staff should not be prejudiced, judgemental, dismissive or irresponsible in dealing with such sensitive matters.

### **Gather the Facts**

The DSL will speak to the young people involved separately, gain a statement of facts from them and use consistent language and open questions for each account. The easiest way to do this is not to have a line of questioning but to ask the young people to tell you what happened. Only interrupt the young person from this to gain clarity with open questions, 'where, when, why, who'. (What happened? Who observed the incident? What was seen? What was heard? Did anyone intervene?)

### **Consider the Intent (begin to Risk Assess)**

Has this been a deliberate or contrived situation for a young person to be able to harm another?

### **Action by DSL**

If from the information gathered it is believed that any young person is at risk of significant harm a safeguarding referral should be made immediately (where a crime has been committed the police should be involved also). If this is the case, once social care has been contacted and made a decision on what will happen next the DSL will be informed of the next steps.

If social care and the police intend to pursue this further they may ask to interview the young people in school or they may ask for parents to come to school to be spoken to also.

### **Informing parents**

If, once appropriate advice has been sought from police/social care the parents will need to be informed as soon as possible. If services are not going to be involved then equally, this information may need to be shared with parents. If a young person is deemed to be \*'Gillick Competent' following the 'Fraser' guidelines and does not wish you to share the information with parents, then the school must consider this especially for example if the young person is pregnant and this is why they are being bullied (unless this has occurred through significant harm in which case a criminal/social care case is likely or the young person is under the age of 13).

In all circumstances where the risk of harm to the child is evident then the school should encourage the young person to share the information with their parent or even with them (they may be scared to tell parents that they are being harmed in any way). Where school can evidence they are acting in the best interests of the young person they would not be criticised, however this would be the case if they actively breached the rights and choices of the young person.

The best way to inform parents is face to face. Although this may be time consuming, the nature of the incident and the type of harm/abuse a young person may be suffering can cause fear and anxiety to parents whether their child is the child who was harmed or who harmed another.

**Points to consider:**

What is the age of the children involved?

How old are the young people involved in the incident and is there any age difference between those involved? (In relation to sexual exploration, children under the age of 5, in particular 1-4 year olds who are learning toileting skills may show a particular interest in exploration at around this stage. This, however should not be overlooked if other issues arise (see following)

**Where did the incident or incidents take place?**

Was the incident in an open, visible place to others? If so was it observed? If not, is more supervision required within this particular area?

**What was the explanation by all children involved of what occurred?**

Can each of the young people give the same explanation of the incident and also what is the effect on the young people involved? Is the incident seen to be bullying for example, in which case regular and repetitive? Is the version of one young person different from another and why?

**What is each of the children's own understanding of what occurred?**

Do the young people know/understand what they are doing? E.g. do they have knowledge of body parts, of privacy and that it is inappropriate to touch? Is the young person's explanation in relation to something they may have heard or been learning about that has prompted the behaviour? Is the behaviour deliberate and contrived? Does the young person have an understanding of the impact of their behaviour on the other person?

In dealing with an incident of this nature the answers are not always clear cut. If you are concerned or unsure as to whether or not there is any risk involved, please seek advice from Children's Services Social Care.

**Repetition**

Has the behaviour been repeated to an individual on more than one occasion? In the same way it must be considered has the behaviour persisted to an individual after the issue has already been discussed or dealt with and appropriately resolved?

**Next Steps**

Once the outcome of the incident(s) has been established it is necessary to ensure future incidents of abuse do not occur again and consider the support and intervention required for those involved.

**For the young person who has been harmed**

What support they require depends on the individual young person. It may be that they wish to seek counselling or one to one support via a mentor. It may also be that they feel able to deal with the incident(s) on their own or with support of family and friends. In which case it is necessary that this young person continues to be monitored and offered support should they require it in the future. If the incidents are of a bullying nature, the young person may need support in improving peer groups/relationships with other young people or some restorative justice work with all those involved may be required.

Other interventions that could be considered may target a whole class or year group for example a speaker on cyber bullying, relationship abuse etc. It may be that through the continued curriculum of PHSE and SMSC that certain issues can be discussed and debated more frequently.

If the young person feels particularly vulnerable it may be that a risk assessment can be put in place for them whilst in school so that they have someone named that they can talk to,

support strategies for managing future issues and identified services to offer additional support.

**For the young person who has displayed harmful behaviour**

In this circumstance it is important to find out why the young person has behaved in such a way. It may be that the young person is experiencing their own difficulties and may even have been harmed themselves in a similar way. In such cases support such as one to one mentoring or counselling may also be necessary. Particular support from identified services may be necessary through a CAF/strengthening families/early help referral and the young person may require additional support from family members.

Once the support required to meet the individual needs of the young person has been met, it is important that young person receives a consequence for their behaviour. This may be in the form of restorative justice e.g. making amends with the young person they have targeted if this has been some form of bullying. In the cases of sexually harmful behaviour it may be a requirement for the young person to engage in one to one work with a particular service or agency (if a crime has been committed this may be through the police or youth offending service). If there is any form of criminal investigation ongoing it may be that this young person cannot be educated on site until the investigation has concluded. In which case, the young person will need to be provided with appropriate support and education whilst off site.

Even following the conclusion of any investigation, the behaviour that the young person has displayed may continue to pose a risk to others in which case an individual risk assessment may be required. This should be completed via a multi-agency response to ensure that the needs of the young person and the risks towards others are measured by all of those agencies involved including the young person and their parents. This may mean additional supervision of the young person or protective strategies if the young person feels at risk of engaging in further inappropriate or harmful behaviour.

The school may also choose a punishment as a consequence such as exclusion or internal exclusion/inclusion/seclusion for a period of time to allow the young person to reflect on their behaviour.

**After care**

It is important that following the incident the young people involved continue to feel supported and receive help even if they have stated that they are managing the incident. Sometimes the feelings of remorse, regret or unhappiness may occur at a much later stage than the incident. It is important to ensure that the young people do not engage in any further harmful behaviour either towards someone else or to themselves as a way of coping (e.g. self-harm). In which case, regular reviews with the young people following the incident(s) are imperative.

### **Safer recruitment**

This part Policy has four outlining the legal requirements ‘must do’, what they should do, what is considered best practice and important information about:

- the recruitment and selection process;
- pre-appointment and vetting checks, regulated activity and recording of information;
- other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings; and iv. how to ensure the ongoing safeguarding of children and the legal reporting duties on employers.

### **Recruitment and selection process**

- This section focuses on ensuring potential applicants are given the right messages about the school commitment to recruit suitable people.
- It is vital that governing bodies create a culture that safeguards and promotes the welfare of children in their school or college. As part of this culture, it is important that they adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools and colleges.
- Governing bodies should ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of this part (Part three) of this guidance.
- The School Staffing (England) Regulations 2009 and the Education (Pupil Referral Units) (Application of Enactments) (England) Regulations 2007 require governing bodies of maintained schools and management committees of pupil referral units (PRUs) to ensure that at least one of the persons who conducts an interview has completed safer recruitment training. Governing bodies of maintained schools and management committees of PRUs may choose appropriate training and may take advice from the safeguarding partners in doing so.

### **Advert**

- Schools and should think about including the following information when defining the role (through the job or role description and person specification):
  - the skills, abilities, experience, attitude, and behaviours required for the post; and
  - the safeguarding requirements, i.e. to what extent will the role involve contact with children and will they be engaging in regulated activity relevant to children.

The advert should include:

- the school's or college's commitment to safeguarding and promoting the welfare of children and make clear that safeguarding checks will be undertaken;
- the safeguarding responsibilities of the post as per the job description and personal specification; and
- whether the post is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. Which means that when applying for certain jobs and activities certain spent convictions and cautions are 'protected', so they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Further information about filtering offences can be found in the [DBS filtering guide](#).

### **Application forms**

- Where a role involves engaging in regulated activity relevant to children, schools and colleges should include a statement in the application form or elsewhere in the information provided to applicants that it is an offence to apply for the role if the applicant is barred from engaging in regulated activity relevant to children.
- Schools and colleges should also provide a copy of the school's or college's child protection policy and practices and policy on employment of ex-offenders in the application pack or refer to a link on its website.
- Schools and colleges should require applicants to provide:
  - personal details, current and former names, current address and national insurance number;
  - details of their present (or last) employment and reason for leaving;
  - \* full employment history, (since leaving school, including education, employment and voluntary work) including reasons for any gaps in employment;
  - qualifications, the awarding body and date of award;
  - details of referees/references (see below for further information); and
  - a statement of the personal qualities and experience that the applicant believes are relevant to their suitability for the post advertised and how they meet the person specification.
- Schools should not accept copies of curriculum vitae in place of an application form.

### **Shortlisting**

- Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children. Self-declaration is subject to Ministry of Justice guidance on the disclosure of criminal records, further information can be found on GOV.UK

For example:

- if they have a criminal history;
- whether they are included on the barred list;
- whether they are prohibited from teaching;

- whether they are prohibited from taking part in the management of an independent school;
  - information about any criminal offences committed in any country in line with the law as applicable in England and Wales, not the law in their country of origin or where they were convicted;
  - if they are known to the police and children's social care;
  - have they been disqualified from providing childcare; and,
  - any relevant overseas information.
- This information should only be requested from applicants who have been shortlisted. The information should not be requested in the application form to decide who should be shortlisted.
- Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview.
- The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.
- Schools and colleges should:
    - ensure that at least two people carry out the shortlisting exercise (it is recommended that those who shortlist carry out the interview for a consistent approach);
    - consider any inconsistencies and look for gaps in employment and reasons given for them; and,
    - explore all potential concerns. Employment history and references 203. The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain references before interview, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.
- Schools should:
    - not accept open references e.g. to whom it may concern;
    - not rely on applicants to obtain their reference;
    - ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the principal as accurate in respect to disciplinary investigations);
    - obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
    - secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer;
    - always verify any information with the person who provided the reference;
    - ensure electronic references originate from a legitimate source;

- contact referees to clarify content where information is vague or insufficient information is provided;
  - compare the information on the application form with that in the reference and take up any discrepancies with the candidate;
  - establish the reason for the candidate leaving their current or most recent post; and, • ensure any concerns are resolved satisfactorily before appointment is confirmed.
- When asked to provide references schools and colleges should ensure the information confirms whether they are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding allegations but should not include information about allegations which are unsubstantiated, unfounded, false, or malicious. References are an important part of the recruitment process and should be provided in a timely manner and not hold up proceedings.

### **Selection**

- Schools should use a range of selection techniques to identify the most suitable person for the post. Those interviewing should agree structured questions. These should include:
  - finding out what attracted the candidate to the post being applied for and their motivation for working with children;
  - exploring their skills and asking for examples of experience of working with children which are relevant to the role; and
  - probing any gaps in employment or where the candidate has changed employment or location frequently, asking about the reasons for this.
- The interviews should be used to explore potential areas of concern to determine the applicant's suitability to work with children. Areas that may be concerning and lead to further probing include:
  - implication that adults and children are equal;
  - lack of recognition and/or understanding of the vulnerability of children;
  - inappropriate idealisation of children;
  - inadequate understanding of appropriate boundaries between adults and children; and,
  - indicators of negative safeguarding behaviours.
- Any information about past disciplinary action or allegations should be considered in the circumstances of the individual case.
- Pupils/students should be involved in the recruitment process in a meaningful way. Observing short listed candidates and appropriately supervised interaction with pupils/students is common and recognised as good practice.
- All information considered in decision making should be clearly recorded along with decisions made.



### Pre-appointment vetting checks, regulated activity and recording information

This section provides the legal requirements that governing bodies and proprietors need to understand (and which must be carried out) when appointing individuals to engage in regulated activity relating to children. It covers the importance of ensuring the correct pre-appointment checks are carried out. These checks will help identify whether a person may be unsuitable to work with children (and in some cases is legally prohibited from working with children and/or working as a teacher). They should be seen as the part of a wider safeguarding regime which will carry on following appointment. This section also explains what information schools and **must** record on the single central record.

- All offers of appointment should be conditional until satisfactory completion of the mandatory pre-employment checks. All Schools and colleges **must**:
  - verify a candidate's identity, it is important to be sure that the person is who they claim to be, this includes being aware of the potential for individuals changing their name. Best practice is checking the name on their birth certificate, where this is available. Further identification checking guidelines can be found on the GOV.UK website.
  - obtain (via the applicant) an enhanced DBS check (including children's barred list information, for those who will be engaging in regulated activity with children). Note that when using the DBS update service you still need to obtain the original physical certificate;
  - obtain a separate children's barred list check if an individual will start work in regulated activity with children before the DBS certificate is available; See paragraph 242 of KCSIE on how to obtain a separate barred list check.
  - verify the candidate's mental and physical fitness to carry out their work responsibilities. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role;
  - verify the person's right to work in the UK, including EU nationals. If there is uncertainty about whether an individual needs permission to work in the UK, then schools and colleges should follow advice on the GOV.UK website;
  - if the person has lived or worked outside the UK, make any further checks the school or college consider appropriate; and,
  - verify professional qualifications, as appropriate. The Teaching Regulation Agency's (TRA) Employer Access Service should be used to verify any award of qualified teacher status (QTS), and the completion of teacher induction or probation.

In addition:

- independent schools, including academies and free schools, must check that a person taking up a management position as described at paragraph 237 of KCSIE is not subject to a section 128 direction made by the Secretary of State;
- all schools must ensure that an applicant to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State (see paragraph 234 of KCSIE for prohibition checks or any sanction or restriction imposed (that remains current) by the GTCE (see paragraph 236 KCSIE), before its abolition in March 2012;
- before employing a person to carry out teaching work in relation to children, colleges must take reasonable steps to establish whether that person is subject to a prohibition order issued by the Secretary of State.

- all schools and colleges providing childcare must ensure that appropriate checks are carried out to ensure that individuals employed to work in reception classes, or in wraparound care for children up to the age of 8, are not disqualified from working in these settings under the 2018 Childcare Disqualification Regulations. Further details about the application of these arrangements are provided at paragraphs.

**Applicant moving from previous post**

- There is no requirement for a school to obtain an enhanced DBS certificate or carry out checks for events that may have occurred outside the UK if, during a period which ended not more than three months before the person's appointment, the applicant has worked, in a school in England, in a post:
  - which brought the person regularly into contact with children; or
  - to which the person was appointed on or after 12th May 2006 and which did not bring the person regularly into contact with children or young persons; or
  - in another institution within the further education sector in England, or in a 16-19 academy, in a post which involved the provision of education which brought the person regularly into contact with children or young persons.
- Whilst there is no requirement to carry out an enhanced DBS check in the circumstances described above, schools or colleges may still choose to request one to ensure they have up to date information. However, schools and colleges must still carry out all other relevant pre-appointment checks (as listed at 213 KCSIE), including where the individual is engaging in regulated activity with children, a children's barred list check.

**Regulated activity**

- In summary, a person will be engaging in regulated activity with children if, as a result of their work, they:
  - will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children;
  - will be working on a regular basis in a specified establishment, such as a school, for or in connection with the purposes of the establishment, where the work gives opportunity for contact with children; or
  - engage in intimate or personal care or healthcare or any overnight activity, even if this happens only once.

Further details on regulated activity below.

### **Regulated activity**

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced [Factual note on regulated activity in relation to children: scope.](#)

Regulated activity includes:

- a. teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;
- b. work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

Work under (a) or (b) is regulated activity only if done regularly.<sup>66</sup> Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

- c. relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability;<sup>67</sup>
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

Regulated activity will not be:

- paid work in specified places which is occasional and temporary and does not involve teaching, training; and
- supervised activity which is paid in non-specified settings such as youth clubs, sports clubs etc

## Types of DBS checks

These are the types of checks available.

- **Basic DBS check** – this provides details of convictions and conditional cautions considered to be ‘unspent’ under the terms of the Rehabilitation of Offenders Act 1974.
- **Standard DBS check** – this provides information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC), regardless of whether they are spent under the Rehabilitation of Offenders Act 1974. The law allows for certain old and minor matters to be filtered out.
- **Enhanced DBS check** – this provides the same information about convictions, cautions, reprimands and warnings held on the Police National Computer (PNC) as a Standard DBS check, plus additional information held by police such as interviews and allegations. Additional information will only be disclosed where a chief police officer reasonably believes it to be relevant and considers that it ought to be disclosed. The position being applied for/or activities being undertaken must be covered by an exempted question in the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 and by provisions in the Police Act 1997 (Criminal Records) Regulations 2002.68
- **Enhanced DBS check with children’s barred list information** – where people are working or seeking to work in regulated activity relating to children, this allows an additional check, to be made, about whether the person appears on the children’s barred list, along with a check of the Police National Computer records plus additional information held by police as above. The position being applied for or activities being undertaken must be eligible for an enhanced DBS check as above and be for a purpose listed in the Police Act 1997 (Criminal Records) (No2) Regulations 2009 as qualifying for a barred list(s) check. In addition, this check can also include information as to whether an individual is subject to a section 128 direction. However, they have to use specific wording in the position applied for field (see paragraph 240).

## Considering which type of check is required

- Most staff in a school working with children will be engaging in regulated activity relating to children, in which case an enhanced DBS check which includes children’s barred list information, will be required.
- For all other staff (e.g. contractors) who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.
- Barred list information must not be requested on any person who is not engaging in or seeking to engage in regulated activity.
- The flowchart below provides more information on the decision making process.
- Where a DBS certificate is required, it must be obtained from the candidate before, or as soon as practicable after, the person’s appointment, including when using the DBS update service.

- Once the checks are complete, the DBS will send a DBS certificate to the applicant. The applicant must show the original paper DBS certificate to their potential employer before they take up post, or as soon as practicable afterwards. Schools and colleges will be able to compare any information disclosed on the certificate with any information shared by the applicant during the recruitment process. DBS guidance on <https://www.gov.uk/>
- Schools should assess cases fairly, on an individual basis. A decision not to appoint somebody because of their conviction(s) should be clearly documented, so if challenged the school or college can defend its decision.
- When assessing any disclosure information on a DBS certificate schools and colleges should take into consideration the explanation from the applicant, including for example:
  - the seriousness and relevance to the post applied for;
  - how long ago the offence occurred;
  - whether it was a one-off incident or a history of incidents;
  - the circumstances around the incident; and
  - has the individual accepted responsibility for their actions?
- The school should also consider the incident in the context of the Teachers' Standards and Teacher misconduct guidance, if the applicant is applying for a teaching post.
- Where a school allows an individual to start work in regulated activity relating to children before the DBS certificate is available, it should ensure that the individual is appropriately supervised and that they carry out all other checks, including a separate **children's barred list check**.
- Separate barred list checks must only be carried out in the following circumstances:
  - for newly appointed staff who are engaging in regulated activity, pending the receipt of an Enhanced Certificate with Barred List information from the Disclosure and Barring Service (DBS) (and where all other relevant checks as per paragraph 213 KCSIE have been carried out); or,
  - where an individual has worked in a post in a school or college that brought them into regular contact with children or young persons which ended not more than three months prior to that person's appointment to the organisation (and where all other relevant checks as per paragraph 213 KCSIE have been carried out).

### DBS Update Service

- Individuals can join the DBS Update Service at the point that an application for a new DBS check is made. Subscription to the service enables future status checks to be carried out by employers to confirm that no new information has been added to the check since its issue.
- As good practice, many schools and colleges require new staff to join the Update Service as part of their employment contract. Staff at Lowbrook are now encouraged to do this. The benefits of joining the Update Service are:
  - portability of a DBS check across employers;

- free online checks to identify whether there has been any change to the information recorded, since the initial certificate was issued and advise whether the individual should apply for a new DBS check; and
- that individuals will be able to see a full list of those organisations that have carried out a status check on their account.
- Before using the Update Service, schools and colleges must:
  - obtain consent from the individual to carry out an online check to view the status of an existing standard or enhanced DBS check;
  - confirm the DBS certificate matches the individual's identity;
  - examine the original certificate to ensure that it is valid for the children's workforce; and,
  - ensure that the level of the check is appropriate to the job they are applying for, e.g. enhanced DBS check/enhanced DBS check including with barred list information.

Further information about the Update Service, including when updated information can be used, can be found on GOV.UK.

### **Prohibitions, directions, sanctions and restrictions**

#### **Secretary of State teacher prohibition, and interim prohibition orders**

Teacher prohibition and interim prohibition orders prevent a person from carrying out teaching work as defined in the Teachers' Disciplinary (England) Regulations 2012 in schools, sixth form colleges, 16-19 academies, relevant youth accommodation and children's homes in England. Further information about the duty to consider referring to the Teaching Regulation Agency (TRA) can be found at paragraph 333 of KCSIE. Teacher prohibition orders are made by the Secretary of State following consideration by a professional conduct panel convened by the TRA. Pending such consideration, the Secretary of State may issue an interim prohibition order if it is considered to be in the public interest to do so. The TRA's role in making prohibition orders and the processes used to impose them are described in more detail in the publication "[Teacher misconduct: disciplinary procedures for the teaching profession](#)" and "[Teacher misconduct: the prohibition of teachers: Advice on factors relating to decisions leading to the prohibition of teachers from the teaching profession](#)".

- A person who is prohibited **must not** be appointed to a role that involves teaching work (as defined in the Teachers' Disciplinary (England) Regulations 2012 (see footnote 72).

#### **Historic General Teaching Council for England (GTCE) sanctions and restrictions**

- There remain a number of individuals who are still subject to disciplinary sanctions, which were imposed by the GTCE (prior to its abolition in 2012). See paragraph 242 for login details to the TRA Secure Access system where GTCE checks can be made.

### **Secretary of State section 128 direction**

- A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. An individual who is subject to a section 128 direction is unable to:
  - take up a management position in an independent school, academy, or in a free school as an employee;
  - be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or,
  - be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.
- There is no exhaustive list of roles that might be regarded as ‘management’ for the purpose of determining what constitutes management in an independent school. The Department’s view is that roles involving, or very likely to involve, management of a school include (but are not limited to) headteachers, principals, deputy/assistant headteachers, governors and trustees. It is important to note that the individual’s job title is not the determining factor and whether other individuals such as teachers with additional responsibilities could be considered to be ‘taking part in management’ depends on the facts of the case.<sup>74</sup>
- The grounds on which a section 128 direction may be made by the Secretary of State are set out in The Independent Educational Provision in England (Prohibition on Participation in Management) Regulations 2014 <sup>75</sup> made under section 128 of the Education and Skills Act 2008.
- A section 128 direction will be disclosed when an enhanced DBS check with children’s barred list information is requested, provided that ‘child workforce independent schools’ is specified on the application form as the position applied for. Where a person is not eligible for a children’s barred list check but will be working in a management position in an independent school, a section 128 check should be carried out using the TRA’s Employer Access service.
- A person subject to a section 128 direction is also disqualified from holding or continuing to hold office as a governor of a maintained school.

### **How to check TRA, Teacher Employer Access service for prohibitions, directions, sanctions and restrictions**

- Schools and college can use the use the TRA’s Employer Access service to make prohibition, direction, restriction, and children’s barred list checks. The service is free to use and is available via the TRA’s
- Further information about obtaining a DfE Sign-in account and using the Employer Access service to carry out a range of ‘teacher status checks’ GOV.UK. including verification of qualified teacher status (QTS) and the completion of teacher induction or teacher probation can be found on

### **European Economic Area (EEA) regulating authority teacher sanctions or restrictions**

- From 01 January 2021 the TRA Teacher Services system no longer maintains a list of those teachers who have been sanctioned in EEA member states. Advice about how information about a teacher’s past conduct may be obtained can be found at paragraph 262-267.



### Childcare disqualification

- Childcare disqualification is an additional requirement to the general child safeguarding arrangements provided under the Disclosure and Barring Service (DBS) regime, which apply to all children.
- The childcare disqualification arrangements apply to staff working with young children in childcare settings, including primary schools, nurseries and other registered settings, such as childcare provision on college sites.
- The arrangements predominantly apply to individuals working with children aged 5 and under, including reception classes, but also apply to those working in wraparound care for children up to the age of 8, such as breakfast clubs and after school care.
- For staff who work in childcare provision, or who are directly concerned with the management of such provision, employers need to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification Regulations 2018. 249.
- Further information on the staff to whom these Regulations apply, the checks that should be carried out, and the recording of those checks can be found in Disqualification under the Childcare Act 2006 statutory guidance on GOV.UK.

### Recording information

#### Single central record

- Schools and colleges **must** maintain a single central record of pre-appointment checks, referred to in the Regulations as the register and more commonly known as the single central record.
- The single central record **must** cover the following people:
  - **for schools, all staff**, including teacher trainees on salaried routes, agency and third-party supply staff, even if they work for one day;
  - for independent schools, all members of the proprietor body. In the case of academies and free schools, this means the members and trustees of the academy trust.

Below sets out the minimum information that **must** be recorded in respect of staff members (including teacher trainees on salaried routes). For agency and third party supply staff, schools and colleges **must** include whether written confirmation has been received that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, the date this confirmation was received and whether details of any enhanced DBS certificate have been provided in respect of the member of staff.

- The single central record **must** indicate whether the following checks have been carried out or certificates obtained, and the date on which each check was completed or certificate obtained:
  - an identity check, (identification checking guidelines can be found on the GOV.UK website);
  - a barred list check;
  - an enhanced DBS check requested/certificate provided;
  - a prohibition from teaching check;
  - further checks on people who have lived or worked outside the UK (see paragraphs 262-267 of KCSIE);
  - a check of professional qualifications, where required; and
  - a check to establish the person's right to work in the United Kingdom.

In addition:

- independent schools (including academies and free schools) **must** record details of the section 128 checks undertaken for those in management positions.
- The details of an individual should be removed from the single central record once they no longer work at the school or college.

#### **Non-statutory information**

Schools and colleges are free to record any other information they deem relevant. For example:

- whether relevant staff have been informed of their duty to disclose relevant information under the childcare disqualification arrangements;
  - checks made on volunteers;
  - checks made on governors;
  - dates on which safeguarding and safer recruitment training was undertaken; and
  - the name of the person who carried out each check.
- The single central record can be kept in paper or electronic form.

#### **Retention of documents**

- Schools and colleges do not have to keep copies of DBS certificates in order to fulfil the duty of maintaining the single central record. To help schools and colleges comply with the requirements of the Data Protection Act 2018, when a school or college chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed a school or college may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to.

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10.84 A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.

- Further information on handling DBS information can be found on <https://www.gov.uk/>

#### **Other checks that may be necessary for staff, volunteers and others, including the responsibilities on schools and colleges for children in other settings**

- This section sets out the checks that are necessary for individuals who have lived or worked outside the UK; agency and third-party staff; contractors; trainee teachers; volunteers; governors and proprietors. It also sets out responsibilities placed on schools and colleges in relation to other settings, including alternative provision, work experience and host families.

#### **Individuals who have lived or worked outside the UK**

- Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in schools or colleges (set out in paragraphs 213 of KCSIE). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity) even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world.

These checks **could** include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found on GOV.UK; and for teaching positions
- obtaining a letter (via the applicant) from the professional regulating authority in the country (or countries) in which the applicant has worked confirming that they have not imposed any sanctions or restrictions, and or that they are aware of any reason why they may be unsuitable to teach Regulated Professions database. Applicants can also contact the UK Centre for Professional Qualifications who will signpost them to the appropriate EEA regulatory body. 87. Applicants can find contact details of regulatory bodies in the EU/EEA and Switzerland on the
- **Where available**, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability
- **Where this information is not available** schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment.

Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment. Further information can be found in DfE Guidance:

- Not all countries provide criminal record information, and where they do, the nature and detail of the information provided varies from country to country. Schools and colleges should also be mindful that the criteria for disclosing offences in other countries often have a different threshold than those in the UK. The Home Office provides guidance on criminal records checks for overseas applicants which can be found on [www.gov.uk](http://www.gov.uk)
- Some overseas qualified teachers can apply to the TRA for the award of qualified teacher status (QTS) in England. More information about this is available here. Please note that holding a teaching qualification (wherever it was obtained) does not provide suitable assurances for

safeguarding purposes that an individual has not been found guilty of any wrongdoing or misconduct, and or is suitable to work with children.

#### **Agency and third party staff (supply staff)**

- Schools and colleges **must** obtain written notification from any agency, or third party organisation, that they have carried out the checks on an individual who will be working at the school or college that the school or college would otherwise perform. In respect of the enhanced DBS check, schools and colleges **must** ensure that written notification confirms the certificate has been obtained by either the employment business or another such business.
- Where the agency or organisation has obtained an enhanced DBS certificate before the person is due to begin work at the school or college, which has disclosed any matter or information, or any information was provided to the employment business, the school or college **must** obtain a copy of the certificate from the agency.
- Where the position requires a children's barred list check, this **must** be obtained by the agency or third party by obtaining an enhanced DBS certificate with barred list information, prior to appointing the individual.

The school or college should also check that the person presenting themselves for work is the same person on whom the checks have been made.

#### **Contractors**

- Where schools and colleges use contractors to provide services, they should set out their safeguarding requirements in the contract between the organisation and the school or college.
- Schools and colleges should ensure that any contractor, or any employee of the contractor, who is to work at the school or college, has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity relating to children will require an enhanced DBS check (including children's barred list information).
- For all other contractors who are not engaging in regulated activity relating to children, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including children's barred list information) will be required.<sup>93</sup> In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across several sites. In cases where the contractor does not have opportunity for regular contact with children, schools and colleges should decide on whether a basic DBS disclosure would be appropriate.
- Under no circumstances should a contractor on whom no checks have been obtained be allowed to work unsupervised or engage in regulated activity relating to children. Schools and colleges are responsible for determining the appropriate level of supervision depending on the circumstances.
- If an individual working at a school or college is self-employed, the school or college should consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Schools and colleges should always check the identity of contractors where on arrival at the school or college.

### **Trainee/student teachers**

- Where applicants for initial teacher training are salaried by the school or college, the school or college **must** ensure that all necessary checks are carried out. If these trainee teachers are engaging in regulated activity relating to children (which in most cases by the nature of the work, they will be), an enhanced DBS check (including children's barred list information) **must** be obtained.
- Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks that the school or college would otherwise be required to perform, and that the trainee has been judged by the provider to be suitable to work with children.
- There is no requirement for the school or college to record details of fee-funded trainees on the single central record. However, schools and colleges may wish to record this information under non statutory information, see paragraph 255 KCSIE.

### **Visitors**

- Schools have different types of visitors, those with a professional role i.e. educational psychologists, social workers etc. those connected with the building, grounds maintenance, children's relatives or other visitors attending an activity in school such as a sports day.
- Schools should not request DBS checks or barred list checks, or ask to see existing DBS certificates, for visitors such as children's relatives or other visitors attending a sports day.
- Headteachers and principals should use their professional judgment about the need to escort or supervise such visitors.
- For visitors who are there in a professional capacity check ID and be assured that the visitor has had the appropriate DBS check (or the visitor's employers have confirmed that their staff have appropriate checks).
- Whilst external organisations can provide a varied and useful range of information, resources and speakers that can help schools and colleges enrich children's education, careful consideration should be given to the suitability of any external organisations.
- School and college safeguarding policies should set out the arrangements for individuals coming onto their premises, which may include an assessment of the education value, the age appropriateness of what is going to be delivered and whether relevant checks will be required.

### **Volunteers**

- Under no circumstances should a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.
- Whilst volunteers play an important role and are often seen by children as being safe and trustworthy adults, the nature of voluntary roles varies, so schools and colleges should undertake a written risk assessment and use their professional judgement and experience when deciding what checks, if any, are required.

- The risk assessment should consider:
  - the nature of the work with children, especially if it will constitute regulated activity, including the level of supervision;
  - what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
  - whether the volunteer has other employment or undertakes voluntary activities where referees can advise on their suitability; and
  - whether the role is eligible for a DBS check and, if it is, what level is appropriate

Details of the risk assessment should be recorded.

#### **When should a DBS with barred list be obtained for volunteers?**

- Schools or colleges should obtain an enhanced DBS check (which should include children's barred list information) for all volunteers who are new to working in regulated activity with children, i.e. where they are unsupervised and teach or look after children regularly, or provide personal care on a one-off basis in schools and colleges. See Annex F of KCSIE for statutory supervision guidance.
- Employers are not legally permitted to request barred list information on a supervised volunteer, as they are not considered to be engaging in regulated activity.

#### **Supervision of volunteers**

- It is for schools and colleges to determine whether a volunteer is considered to be supervised. Where an individual is supervised, to help determine the appropriate level of supervision, schools and colleges **must** have regard to the statutory guidance issued by the Secretary of State (replicated at Annex F of KCSIE).
- For a person to be considered supervised, the supervision **must** be:
  - by a person who is in regulated activity relating to children;<sup>98</sup>
  - regular and day to day; and
  - reasonable in all the circumstances to ensure the protection of children.

#### **Existing volunteers**

- Volunteers engaging in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information) unless the school or college have any concerns.

#### **Maintained school governors**

- Governors in maintained schools are required to have an enhanced DBS check. It is the responsibility of the governing body to apply for the certificate for any governors who do not already have one.
- Governance is not a regulated activity relating to children, so governors do not need a children's barred list check unless, in addition to their governance duties, they also engage in regulated activity.

Schools should also carry out a section 128 check for school governors, because a person prevented from participating in the management of an independent school by a section 128 direction, is also disqualified from being a governor of a maintained school. Using the free

Employer Secure Access sign-in portal via the Teaching Regulation Authority (TRA) Teacher Services web page, schools can check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction. There is no requirement for schools to record this information on the single central record, however, see paragraph 255 KCSIE on recording non-statutory information.

- Associate members are appointed by the governing body to serve on one or more governing body committees. The School Governance (Constitution and Federations) (England) (Amendment) Regulations 2016 which make enhanced DBS checks mandatory for maintained school governors do not apply to associate members, and so there is no requirement for them to be checked unless they also engage in regulated activity at their school.

#### **Proprietors of independent schools, including academies and free schools and proprietors of alternative provision academies<sup>100</sup>**

- The requirement for an enhanced DBS check and certificate is disapplied for the chair of an academy trust if the academy is converting from a maintained school and the person has already been subject to a check carried out by the local authority.
- Where the proprietor is a body of people (including a governing body in an academy or free school), the chair **must** ensure that enhanced DBS checks are undertaken, for the other members of the body, and that where such a check has been undertaken, an enhanced DBS certificate is obtained, and the chair **must** ensure that identity checks are completed before, or as soon as practicable after, any individual takes up their position.
- The chair **must** also ensure that other members are not subject to a section 128 direction that would prevent them from taking part in the management of an independent school (including academies and free schools).  
Further checks, as the chair considers appropriate, should be undertaken where, by reason of the individual's living or having lived overseas, obtaining an enhanced DBS check is not sufficient to establish an individual's suitability to work in a school.
- In the case of an academy trust, including those established to operate a free school, the trust **must** require enhanced DBS checks on all members of the academy trust, individual charity trustees, and the chair of the board of charity trustees. Academy trusts, including those established to run a free school, have the same responsibilities as all independent schools in relation to requesting enhanced DBS checks for permanent and supply staff.
- Where an academy trust delegates responsibility to any delegate or committee (including a local governing body), the trust **must** require DBS checks on all delegates and all members of such committees. Academy trusts **must** also check that members are not disqualified from taking part in the management of the school as a result of a section direction.



### **Alternative provision**

- Where a school places a pupil with an alternative provision provider, the school continues to be responsible for the safeguarding of that pupil and should be satisfied that the provider meets the needs of the pupil.
- Schools should obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

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

- Schools and colleges organising work experience placements should ensure that the placement provider has policies and procedures in place to protect children from harm.
  - Children's barred list checks via the DBS might be required on some people who supervise a child under the age of 16 on a work experience placement. The school or college should consider the specific circumstances of the work experience. Consideration **must** be given in particular to the nature of the supervision and the frequency of the activity being supervised, to determine what, if any, checks are necessary.
- These considerations would include whether the person providing the teaching/training/instruction/supervision to the child on work experience will be:
  - unsupervised themselves; and
  - providing the teaching/training/instruction frequently (more than three days in a 30 day period, or overnight).
- If the person working with the child is unsupervised and the same person is in frequent contact with the child, the work is likely to be regulated activity relating to children. If so, the school or college could ask the employer providing the work experience to ensure that the person providing the instruction or training is not a barred person.
- Schools and colleges are not able to request that an employer obtains an enhanced DBS check with children's barred list information for staff supervising children aged 16 to 17 on work experience.
- If the activity undertaken by the child on work experience takes place in a 'specified place', such as a school or sixth form college, and gives the opportunity for contact with children, this may itself be considered to be regulated activity relating to children. In these cases, and where the child doing the work experience is 16 years of age or over, the work experience provider e.g. school or sixth form college should consider whether a DBS enhanced check should be requested for the child in question. DBS checks cannot be requested for children under the age of 16.

### **Children staying with host families (homestay)**

- Schools and colleges quite often make arrangements for their children receiving education at their institution to have learning experiences where, for short periods, the children may be provided with care and accommodation by a host family to whom they are not related. This might happen, for example, as part of a foreign exchange visit or sports tour, often described as 'homestay' arrangements (see Annex D for further details).

- In some circumstances the arrangement where children stay with UK families could amount to “private fostering” under the Children Act 1989.

#### **Private fostering - LA notification when identified**

- 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 school staff through the normal course of their interaction, and promotion of learning activities, with children.
- Where the arrangements come to the attention of the school or college (and the school or college is not involved in the arrangements), they should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child. Schools and colleges who are involved (whether or not directly) in arranging for a child to be fostered privately **must** notify local authorities of the arrangement as soon as possible after the arrangement has been made. Notifications **must** contain the information specified in Schedule 1 of The Children (Private Arrangements for Fostering) Regulations 2005 and **must** be made in writing.

### **How to ensure the ongoing safeguarding of children and the legal reporting duties on employers**

#### **Ongoing vigilance**

- Governing bodies should ensure they have processes in place for continuous vigilance, maintaining an environment that deters and prevents abuse and challenges inappropriate behaviour.
- To support this, it is important that school and college leaders create the right culture and environment so that staff feel comfortable to discuss matters both within, and where it is appropriate, outside of the workplace, which may have implications for the safeguarding of children. This can assist employers to support staff, where there is a need, and help them manage children’s safety and welfare, potentially providing them with information that will help them consider whether there are further measures or changes to procedures that need to be put in place to safeguard children in their care.

#### **Existing staff**

- There are limited circumstances where schools and colleges will need to carry out new checks on existing staff. These are when:
  - an individual working at the school or college moves from a post that was not regulated activity with children into work which is considered to be regulated activity with children. In such circumstances, the relevant checks for that regulated activity **must** be carried out;
  - there has been a break in service of 12 weeks or more; or
  - there are concerns about an individual’s suitability to work with children.

### **Duty to refer to the Disclosure and Barring Service**

- There is a legal requirement for schools and colleges to make a referral to the DBS where they remove an individual from regulated activity (or would have removed an individual had they not left), and they believe the individual has:
  - engaged in relevant conduct in relation to children and/or adults;
  - satisfied the harm test in relation to children and/or vulnerable adults; or
  - been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence.
- The DBS will consider whether to bar the person. Detailed guidance on when to refer to the DBS (including what is the harm test and relevant conduct), and what information **must** be provided, can be found on GOV.UK.
- Referrals should be made as soon as possible, when an individual is removed from regulated activity. This could include when an individual is suspended, redeployed to work that is not regulated activity, dismissed or when they have resigned. It is important that as much relevant information is provided to the DBS as possible, as it relies on the quality of information provided to them.
- When an allegation is made, an investigation should be carried out to gather enough evidence to establish if it has foundation, and employers should ensure they have sufficient information to meet the referral duty criteria explained in the DBS referral guidance, which can be found on GOV.UK.

### **Duty to consider referral to the Teaching Regulation Agency**

- Where a school or teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they **must** consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.
- The Secretary of State may investigate the case, and if s/he finds there is a case to answer, **must** then decide whether to make a prohibition order in respect of the person. GOV.UK. 117 Details about how to make a referral to the TRA can be found on [www.gov.uk](http://www.gov.uk)

We will keep a single central record of recruitment and record checks of:

<ul style="list-style-type: none"> <li>▪ all teaching staff</li> <li>▪ support staff</li> </ul>	<ul style="list-style-type: none"> <li>▪ Governors who work as volunteers</li> <li>▪ Local Authority and private tutors</li> </ul>
<ul style="list-style-type: none"> <li>▪ supply teachers</li> <li>▪ volunteer parent helpers</li> </ul>	

DBS disclosures will not be applied to the following as it is felt that they will have very little, if any, contact with students, they will be escorted whilst on the school premises or that they will work under the supervision of a teacher:

- Secondary students on work experience
- Representatives from educational firms



- Contractors (the company responsible for contractors will be required to confirm that DBS checks have been carried out)
- Contractors who are on site when students are not present

No new employee will commence their appointment without an enhanced DBS check. An exception to this may be made for the Mandarin teacher who will be required to submit a DBS on arrival and be supervised until the DBS is complete.

**Reference Request for Teaching Staff**

Candidate Name:

Current Job Title:

Current Salary:

Dates of Employment: From:

To:

**Assessment:** Please give your assessment of the candidate's professional abilities indicating any areas of strength and any areas which require development/improvement. If the candidate is currently serving as a teacher, please comment with reference to the national standards for teachers. Please indicate your assessment of the candidate's professional abilities in their current role and how prepared they are, in your opinion, for the role that they are applying for.

**Additional:** If you answer NO to question a) **or** YES to question d)

please provide additional details. If more space is required please attach a separate sheet.

a) Would you re-employ?

Yes

No

(If no please provide further information)

b) Why did this candidate leave your employment

c) How long have you known this candidate and in what capacity	Years	
In what capacity		
d) Has there ever been any disciplinary action taken against the candidate (see below for what should be included*)	Yes	No
What was the reason for disciplinary action		
When did it occur		
<p>*Please include:</p> <ul style="list-style-type: none"> <li>• details of any disciplinary procedures the candidate has been subject to in which the disciplinary sanction is current;</li> <li>• details of any disciplinary procedures the candidate has been subject to involving issues related to the safety and welfare of children or young people, including any in which the disciplinary sanction has expired, and the outcome of those; and,</li> <li>• details of any allegations or concerns that have been raised about the candidate that relate to the safety and welfare of children or young people or behaviour towards children or young people, and the outcome of those concerns e.g. whether the allegations or concern was investigated, the conclusion reached, and how the matter was resolved.</li> <li>• <b>Please do not include details of any allegation which was proven to be false, unsubstantiated or malicious.</b></li> </ul>		
<p>Has the candidate been subject to formal capability action within the last two years? Please note that under the School Staffing (England) (Amendment) Regulations 2012, maintained schools are required to provide this detail, where requested, in respect of candidates applying for teaching positions in maintained and academy schools.</p> <p>YES/NO</p> <p>If YES, please provide details below</p>		
<b>Suitability to work with children</b>		
Do you know of ANY reason why this applicant may not be suitable to work with children?	Yes	No
If yes, please give details		



Under the Data Protection Act 1998, where there has been a Subject Access Request, your consent is required before we may disclose to the data subject the information contained in this reference

I do/do not agree to the disclosure of the information contained in this reference

Signed		Position	
Name		Tel. Number	
Relationship to candidate (i.e. Chair of Governors)			
Do you wish to talk further to the Recruiting Manager		Yes	No

Please ensure the reference is accurate and does not contain any material misstatement or omission.  
The Recruiting manager may contact you if clarification is required on any point  
or if there has been an omission

Thank you for taking the time to complete this reference

Please return to Pauline Reid, School Business Manager



## Reference Request for Teaching Assistants

Candidate Name:		
Current Job Title:		
Current Salary:		
Dates of Employment: From:		To:
<p><b>Assessment:</b> Please give your assessment of the candidate's professional abilities indicating any areas of strength and any areas which require development/improvement. If the candidate is currently serving as a Teaching Assistant please comment on the candidate's professional abilities in this role and how prepared they are, in your opinion, for the role that they are applying for. If they are not currently a Teaching Assistant please indicate your assessment of the candidate's professional abilities in their current role and how prepared they are, in your opinion, for the role that they are applying for.</p>		
<p><b>Additional:</b> If you answer NO to question a) <b>or</b> YES to question d) please provide additional details. If more space is required please attach a separate sheet.</p>		
a) Would you re-employ?	Yes	No
(If no please provide further information)		
b) Why did this candidate leave your employment		
c) How long have you known this candidate and in what capacity		Years
In what capacity		
d) Has there ever been any disciplinary action taken against the candidate (see below for what should be included*)	Yes	No
What was the reason for disciplinary action		

When did it occur			
<p>*Please include:</p> <ul style="list-style-type: none"> <li>details of any disciplinary procedures the candidate has been subject to in which the disciplinary sanction is current;</li> <li>details of any disciplinary procedures the candidate has been subject to involving issues related to the safety and welfare of children or young people, including any in which the disciplinary sanction has expired, and the outcome of those; and,</li> <li>details of any allegations or concerns that have been raised about the candidate that relate to the safety and welfare of children or young people or behaviour towards children or young people, and the outcome of those concerns e.g. whether the allegations or concern was investigated, the conclusion reached, and how the matter was resolved.</li> <li><b>Please do not include details of any allegation which was proven to be false, unsubstantiated or malicious.</b></li> </ul>			
<b>Suitability to work with children</b>			
Do you know of ANY reason why this applicant may not be suitable to work with children?	Yes	No	
If yes please give details			
<p>Under the Data Protection Act 1998, where there has been a Subject Access Request, your consent is required before we may disclose to the data subject the information contained in this reference</p> <p>I do/do not agree to the disclosure of the information contained in this reference</p>			
Signed		Position	
Name		Tel. Number	
Relationship to candidate (i.e. Chair of Governors)			



Do you wish to talk further to the Recruiting Manager	Yes	No
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Please ensure the reference is accurate and does not contain any material misstatement or omission.  
The Recruiting manager may contact you if clarification is required on any point  
or if there has been an omission

Thank you for taking the time to complete this reference

Please return to Pauline Reid, School Business Manager

**Reference Request for Office Staff**

Candidate Name:		
Current Job Title:		
Current Salary:		
Dates of Employment: From: <span style="float: right;">To:</span>		
<p><b>Assessment:</b> Please give your assessment of the candidate's professional abilities indicating any areas of strength and any areas which require development/improvement. If the candidate is currently working in a school setting please comment on the candidate's professional abilities in this role and how prepared they are, in your opinion, for the role that they are applying for. If they are not currently working in a school, please indicate your assessment of the candidate's professional abilities in their current role and how prepared they are, in your opinion, for the role that they are applying for.</p>		
<p><b>Additional:</b> If you answer NO to question a) <b>or</b> YES to question d) please provide additional details. If more space is required please attach a separate sheet.</p>		
a) Would you re-employ?	Yes	No
(If no please provide further information)		
b) Why did this candidate leave your employment		
c) How long have you known this candidate and in what capacity	Years	
In what capacity		

d) Has there ever been any disciplinary action taken against the candidate (see below for what should be included*)	Yes	No
What was the reason for disciplinary action		
When did it occur		
<p>*Please include:</p> <ul style="list-style-type: none"> <li>• details of any disciplinary procedures the candidate has been subject to in which the disciplinary sanction is current;</li> <li>• details of any disciplinary procedures the candidate has been subject to involving issues related to the safety and welfare of children or young people, including any in which the disciplinary sanction has expired, and the outcome of those; and,</li> <li>• details of any allegations or concerns that have been raised about the candidate that relate to the safety and welfare of children or young people or behaviour towards children or young people, and the outcome of those concerns e.g. whether the allegations or concern was investigated, the conclusion reached, and how the matter was resolved.</li> <li>• <b>Please do not include details of any allegation which was proven to be false, unsubstantiated or malicious.</b></li> </ul>		
<b>Suitability to work with children</b>		
Do you know of ANY reason why this applicant may not be suitable to work with children?	Yes	No
If yes, please give details		
<p>Under the Data Protection Act 1998, where there has been a Subject Access Request, your consent is required before we may disclose to the data subject the information contained in this reference</p> <p>I do/do not agree to the disclosure of the information contained in this reference</p>		

Signed		Position	
Name		Tel. Number	
Relationship to candidate (i.e. Chair of Governors)			
Do you wish to talk further to the Recruiting Manager		Yes	No

Please ensure the reference is accurate and does not contain any material misstatement or omission.  
The Recruiting manager may contact you if clarification is required on any point  
or if there has been an omission

Thank you for taking the time to complete this reference

Please return to Pauline Reid, School Business Manager

**Reference Request for Wrap Around Care Staff**

Candidate Name:		
Current Job Title:		
Current Salary:		
Dates of Employment: From:		To:
<p><b>Assessment:</b> Please give your assessment of the candidate's professional abilities indicating any areas of strength and any areas which require development/improvement. If the candidate is currently working in a school setting please comment on the candidate's professional abilities in this role and how prepared they are, in your opinion, for the role that they are applying for. If they are not currently working in a school, please indicate your assessment of the candidate's professional abilities in their current role and how prepared they are, in your opinion, for the role that they are applying for.</p>		
<p><b>Additional:</b> If you answer NO to question a) <b>or</b> YES to question d) please provide additional details. If more space is required please attach a separate sheet.</p>		
a) Would you re-employ?	Yes	No
(If no please provide further information)		
b) Why did this candidate leave your employment		
c) How long have you known this candidate and in what capacity	Years	
In what capacity		
d) Has there ever been any disciplinary action taken against the candidate (see below for what should be included*)	Yes	No



What was the reason for disciplinary action			
When did it occur			
<p>*Please include:</p> <ul style="list-style-type: none"> <li>details of any disciplinary procedures the candidate has been subject to in which the disciplinary sanction is current;</li> <li>details of any disciplinary procedures the candidate has been subject to involving issues related to the safety and welfare of children or young people, including any in which the disciplinary sanction has expired, and the outcome of those; and,</li> <li>details of any allegations or concerns that have been raised about the candidate that relate to the safety and welfare of children or young people or behaviour towards children or young people, and the outcome of those concerns e.g. whether the allegations or concern was investigated, the conclusion reached, and how the matter was resolved.</li> <li><b>Please do not include details of any allegation which was proven to be false, unsubstantiated or malicious.</b></li> </ul>			
<b>Suitability to work with children</b>			
Do you know of ANY reason why this applicant may not be suitable to work with children?	Yes	No	
If yes, please give details			
<p>Under the Data Protection Act 1998, where there has been a Subject Access Request, your consent is required before we may disclose to the data subject the information contained in this reference</p> <p>I do/do not agree to the disclosure of the information contained in this reference</p>			
Signed		Position	
Name		Tel. Number	
Relationship to candidate (i.e. Chair of Governors)			
Do you wish to talk further to the Recruiting Manager	Yes	No	



Please ensure the reference is accurate and does not contain any material misstatement or omission.  
The Recruiting manager may contact you if clarification is required on any point  
or if there has been an omission

Thank you for taking the time to complete this reference

Please return to Pauline Reid, School Business Manager

## APPENDIX 11

### Lowbrook Academy Non-Regular Volunteer Activity Risk Assessment

	Hazard	Level of Risk	Suggested action/control measure (prevention measures). <i>This list is not exhaustive. Below are some control measures which you may find useful when completing your risk assessment.</i>
01.	Poor selection process for volunteers	Low	<ul style="list-style-type: none"> <li>carry out a suitable and sufficient selection process to ensure volunteers are suited to the tasks they perform</li> <li>minors are not permitted to take part in volunteer work unless supervised</li> <li>in-house training to be made available for volunteers who require it</li> </ul>
02.	No DBS check for volunteers	High	<ul style="list-style-type: none"> <li>Regular volunteers should have a DBS check and a copy to be kept in SCR</li> <li>volunteers will not work unsupervised with children.</li> </ul>
03.	Lack of induction for volunteers	Low	<ul style="list-style-type: none"> <li>all one-off volunteers will have a brief induction by one of the DSLs I respect of Safeguarding arrangements</li> </ul>
04.	Poor equipment maintenance used by volunteers	Low	<ul style="list-style-type: none"> <li>inspection and maintenance regimes are in place for equipment used by persons working in the Academy</li> <li>electrical equipment provided by volunteers must not be used unless it has been PAT tested by a competent person</li> </ul>
05.	Minor improvement works e.g. painting	Low	<ul style="list-style-type: none"> <li>volunteers do not work on mechanical, gas or electrical equipment unless qualified to do so</li> <li>all minor improvement works are specifically risk assessed</li> <li>volunteers doing improvement works on site are supervised by a competent member of staff</li> <li>volunteers not to work at height unless trained through recognised training providers</li> <li>works to be carried out in school holidays, otherwise DBS checks will be required if volunteers are to be left alone, unsupervised</li> </ul>
06.	Lack of adequate teacher supervision for pupils on school trips  (Refer to <a href="http://www.gov.uk">www.gov.uk</a> Health and Safety of Pupils on Educational Visits).	Low	<ul style="list-style-type: none"> <li>a relevant risk assessment should be discussed with volunteers for each separate occasion</li> <li>arrange for an adequate amount of volunteers to assist with pupil supervision; to complement staff numbers, not replace them</li> </ul>
07.	Lone working (Refer to Lone Working Policy)	Low	<ul style="list-style-type: none"> <li>volunteers will not work alone</li> </ul>

08.	No Public Liability Insurance Cover	Medium	<ul style="list-style-type: none"> <li>check with either your Insurance Company or KCC Insurance and the Risk Management Team, to confirm that adequate Public Liability Insurance is in place.</li> <li>In the case of parents sharing expertise, e.g. Science Week, the school is liable.</li> </ul>
9.	No First Aid Provision	Low	<ul style="list-style-type: none"> <li>all staff are First-Aid trained</li> <li>ensure all volunteers are briefed on first aid provision, where you go for medical assistance and the name of the first aider available on specific day</li> </ul>
10.	No instruction or information provided to volunteers.	Low	<ul style="list-style-type: none"> <li>ensure all volunteers are briefed on all risk assessments that are relevant to them</li> <li>ensure sufficient information and instructions are given to the relevant volunteers</li> </ul>

**Checklist:**

	Risk assessment discussed with Volunteer
	Volunteer disclosures made to DSL if appropriate, e.g. criminal convictions
	Fire and emergency procedures discussed with Volunteer
	Asbestos and legionella management discussed with Volunteer
	Toilet arrangements discussed with Volunteer
	Mobile Phone, Social Media and Digital Technology (e.g. photography) discussed with Volunteer.
	Access / Chaperone arrangements shared.

**Volunteer name:** .....

**Volunteer signature:** .....

**DSL name:** .....

**DSL signature:** .....

## Appendix 12

### Lowbrook Academy COVID-19 School Closure Safeguarding and Child Protection Additional Procedures and Arrangements in the event of isolating children, partial and full closure.

#### Context

This appendix of our Child Protection and Safeguarding Policy and Procedures contains details of our individual safeguarding arrangements in the following areas:

Item
Context
Key contacts
Vulnerable children
Attendance Monitoring
Designated Safeguarding Lead
Reporting Concerns
Safeguarding Training and induction
Safer recruitment/volunteers and movement of staff
Online safety in
Children and online safety away from school
Supporting children not in school
Supporting children in school
Peer on Peer Abuse

#### Key contacts

Role	Name	Contact number	Email
Designated Safeguarding Lead	Dave Rooney	01628 671355	<a href="mailto:safeguarding@lowbrookacademy.co.uk">safeguarding@lowbrookacademy.co.uk</a>
Deputy Designated Safeguarding Lead(S)	Mrs Denham Mrs West Miss Quinby Pauline Reid	01628 671355	<a href="mailto:safeguarding@lowbrookacademy.co.uk">safeguarding@lowbrookacademy.co.uk</a>
Executive Principal	Dave Rooney	01628 671355	<a href="mailto:safeguarding@lowbrookacademy.co.uk">safeguarding@lowbrookacademy.co.uk</a>
Chair of Governors	Dominique Du Pre	01628 671355	<a href="mailto:safeguarding@lowbrookacademy.co.uk">safeguarding@lowbrookacademy.co.uk</a>
Safeguarding Governor	Dominique Du Pre	01628 671355	<a href="mailto:safeguarding@lowbrookacademy.co.uk">safeguarding@lowbrookacademy.co.uk</a>



### **Vulnerable Children – where possible will attend school during future lockdown protocols**

Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with education, health and care (EHC) plans.

Those who have a social worker include children who have a Child Protection Plan and those who are looked-after by the Local Authority. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989.

Those with an EHC plan will be risk-assessed in consultation with the Local Authority and parents, to decide whether they need to continue to be offered a school place in order to meet their needs, or whether they can safely have their needs met at home. This could include, if necessary, carers, therapists or clinicians visiting the home to provide any essential services. Many children and young people with EHC plans can safely remain at home.

Eligibility for free school meals in and of itself should not be the determining factor in assessing vulnerability.

Senior leaders, especially the Designated Safeguarding Lead (and deputies) know who our most vulnerable children are. They have the flexibility to offer a place to those on the edge of receiving children's social care support

The Academy will continue to work with and support children's social workers to help protect vulnerable children. This includes working with and supporting children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children. The lead people for this, during the school closure will be: Mr Rooney, Mrs Denham.

There is an expectation that vulnerable children who have a social worker will attend an education setting, so long as they do not have underlying health conditions that put them at risk. In circumstances where a parent does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and the Academy will explore the reasons for this directly with the parent/guardians.

Where parents/guardians are concerned about the risk of the child contracting COVID19, the Academy or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England.

The Academy will encourage our vulnerable children and young people to attend a school, including remotely if needed.

### **Attendance Monitoring**

Local authorities and education settings do not need to complete their usual day-to-day attendance processes to follow up on non-attendance.

The Academy and social workers will agree with parents/carers whether children in need should be attending school – we will then follow up on any pupil that they were expecting to attend, who does not. We will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

### **How Will This Look at Lowbrook Academy?**

To support the above, the Academy will, when communicating with parents/carers and carers, confirm emergency contact numbers are correct daily and ask for any additional emergency contact numbers where they are available.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, the Academy will notify their social worker.

### **Designated Safeguarding Lead**

- The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) **will be available to be contacted via phone or online video - for example when working from home.**
- **Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for co-ordinating safeguarding on site.**

This might include updating and managing access to child protection records and liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the Academy.

It is important that all staff and volunteers have access to a trained DSL (or deputy). All Academy staff have the contact details of the DSL, DSL deputies, Senior Leaders and all other staff. All staff have 24-hour access to all members of staff via an Emergency Closure What's App Group and direct phone numbers.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

### **Reporting a Concern**

Where staff have a concern about a child, they should continue to follow the process outlined in this Policy, this includes making a report.

In the unlikely event that a member of staff cannot gain access to the DSL they should email the Designated Safeguarding Deputies and the Executive Principal to ensure that the concern is received.

**Staff are reminded of the need to report any concern immediately and without delay.**

Where staff are concerned about an adult working with children in the school, they should escalate the Whistleblowing policy and to report the concern to the Executive Principal. If there is a requirement to make a notification to the Executive Principal whilst away from school, this should be done verbally and followed up with an email and phone call to the Executive Principal.

Concerns around the Executive Principal should be directed to the Chair of Governors.

### **Safeguarding Training and Induction**



All existing school staff have had safeguarding training and regular safeguarding updates and have read part 1 of Keeping Children Safe in Education (2021). The DSL should communicate with staff any new local arrangements, so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the Academy, they will continue to be provided with a safeguarding induction.

If staff are deployed from another education or children's workforce setting to our school, we will take into account the DfE supplementary guidance on safeguarding children during the COVID-19 pandemic and will accept portability as long as the current employer confirms in writing that: -

- the individual has been subject to an enhanced DBS and children's barred list check
- there are no known concerns about the individual's suitability to work with children
- there is no ongoing disciplinary investigation relating to that individual

### **Safer Recruitment/Volunteers and Movement of Staff**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. When recruiting new staff, the Academy will continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of Keeping Children Safe in Education (2021) (KCSIE).

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

The Academy will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult.

The Academy will continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per paragraph 166 of KCSIE and the TRA's 'Teacher misconduct advice for making a referral.

**During the COVID-19 contingency period all staff referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk)**

Whilst acknowledging the challenge of the current National emergency, it is essential from a safeguarding perspective that any school is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. All staff are given a rota via E-mail informing them of who is in school on a daily basis. As such, the Academy will continue to keep the single central record (SCR) up to date.

### **Online Safety in Schools and Colleges**



The Academy will continue to provide a safe environment, including online. This includes the use of an online filtering system. A policy has been written and is to be used alongside any contingency actions inclusive of online learning.

Where students are using computers in school, appropriate supervision will be in place.

### **Children and Online Safety Away from School and College**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Academy's Child Protection Policy and Procedures document and where appropriate referrals should still be made to children's social care and as required, the police.

### **Online teaching should follow the same principles as set out in the Schools code of conduct.**

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

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

- No 1:1s, groups only- 2 staff should be on each virtual lesson
- Staff and children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and staff should be mindful of the background.
- The live class should be recorded so that if any issues were to arise, the video can be reviewed.
- Live classes should be kept to a reasonable length of time, or the streaming may prevent the family 'getting on' with their day.
- Language must be professional and appropriate, including any family members in the background.
- Staff must only use platforms agreed by the Executive Principal.
- Staff should record, the length, time, date and attendance of any sessions held.

### **Supporting Children Not in School (isolation, partial or full closure)**

Lowbrook Academy is committed to ensuring the safety and wellbeing of all its Children and Young people. A letter has been sent to parents informing them of our procedures during the school closure.

Where the DSL has identified a child to be on the edge of social care support, or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person (Complete a Risk Assessment).

Details of this plan must be recorded following the usual procedures, as should a record of contact made.

The communication plans can include; remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.



The Academy and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website and social media pages.

The Academy recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of pupils and their parents/carers. Teachers at the Academy need to be aware of this in setting expectations of pupils' work where they are at home.

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

### **Supporting Children in School**

The Academy is committed to ensuring the safety and wellbeing of all its students.

Lowbrook Academy will continue to be a safe space for all children to attend and flourish. The Executive Principal will ensure that appropriate staff are on site and staff to pupil ratio numbers are appropriate, to maximise safety. This includes a safeguarding officer and first aider.

The Academy will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID19. The whole school risk assessment for Covid-19 is the key document that reflects this.

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

If there are any concerns about the impact of staff absence – such as our Designated Safeguarding Lead or first aiders – staff will discuss them immediately with the Executive Principal.

### **Peer on Peer Abuse**

The Academy recognises that during the closure a revised process may be required for managing any report of such abuse and supporting victims.

If the Academy receives a report of peer on peer abuse, we will follow the principles as set out in KCSIE and of those outlined within this Policy. Particular attention will be given to measures that mitigate inline abuse.

The Academy will listen and work with the young person, parents/carers and any multiagency partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded and appropriate referrals made in accordance with this Policy.

**Manual for Key Worker Children Daily Provision (This was for lockdown 1 and 2 but will be revised in line with the Contingency plan and mitigations agreed with the command structure in the event of an outbreak or VoC.**

The following is designed to help with some of the practicalities of ensuring daily provision for children of key workers goes smoothly. If you think of anything useful to add to this list please handwrite it below and I will update this list regularly. This document can be found on the Staff Drive 'H:\Staff\Curriculum Planning\Covid-19 Key Workers Provision' folder along with any other documents related to this crisis. If you, at any time, have any questions do not hesitate to contact Mr Rooney (please see staff handbook for PH). Equally, if you are taken ill or are having to self-isolate and are unable to be in on the day you are rota'd, please inform Dave as soon as you are able to. It would be helpful if you can arrange cover yourself and tell us who this is when you contact us if at all possible.

- Mr Rooney, Mrs Denham or Mrs Redjeb will open the school on a rota. The day runs from 9 am to 3 pm. The Pavilion ONLY should be used. The children can also use the toilet facilities in The Pavilion.
- The list of children who have been screened and accepted for emergency key worker provision will be located on the clipboard. In the office
- Please meet the children at the front of the school in the quadrangle playground. Cones have been set at a 2m distance to allow for social distancing whilst queuing to register. Please ensure parents and children adhere to this. Upon arrival, parents MUST sign in their child. They should fill out the sign-in register on the blue clip board, one page for each day using **their own pen** to avoid cross-contamination. Each child must have their temperature taken and screening questions asked before entering the Pavilion.
- Please ensure you date the register at the top and add your name. Keep this ready for parents to sign their child out at the end of the day. **Make sure you get an emergency contact number for each child before parents leave.** Take out wipes so that you can wipe down the sign in register after each person touches it. Parents should complete a medication form if required. HOWEVER, there are no children on the screened list with pre-existing medical conditions and should a parent say their child needs has a new cough, temperature (37 and above) they SHOULD NOT BE AT SCHOOL.
- When the register is completed, please photograph it and WhatsApp it to Kate who will upload to the DFE website. **This needs to be done as close to 9am as possible.**
- By 3pm make sure that the children have tidied the room and collected ALL their belongings before leading them outside The Pavilion where their parents should be waiting. Ensure each parent signs their child out before you hand them over.
- At the end of the session at 3pm after the children have been signed out, please photograph the register again and WhatsApp it to Kate. The register should then be placed at the back of the clipboard so we maintain an attendance record.
- Blank signing in/signing out sheets can be also found on the clipboard. Please leave the sign-in clipboard on the desks with the wipes.
- A Basic First Aid Kit is kept in all classrooms and a larger more extensive kit is found in the medical room where spare inhalers and EpiPen's are also kept A resuscitation unit is also kept in the first aid room.
- Please use your own laptop to avoid cross-contamination.
- Children should **not** engage in any food tasting tasks nor should they share snacks and items in lunch boxes.

- During the day, **ensure the children wash their hands regularly** and ensure surfaces are wiped down regularly. See attached timetables. Where possible children should be distanced from one another. Be mindful of the need to wipe over equipment in the same way we have been doing so far.
- Enforce the *Catch it, bin it, kill it* campaign for good oral hygiene
- Use the planning on the drive to help you structure the day. This has been organised into daily and weekly files for ease and is saved in 'H:\Staff\Curriculum Planning\Covid-19 Key Workers Provision'. The smart notebook slide for the day gives structure and details on planned tasks.
- The day should allow for free time. If the weather is fine, the children may go out on the playground but please supervise them at all times. There are lots of resources on line related to outdoor learning. They should be social distancing even outdoors.
- You may like to add in a slot for collective worship bearing in mind this is an uncertain time and some of the children may feel scared. An excellent resource for this is <https://www.assemblies.org.uk/>
- You may choose to do P.E. with the children. If so, do not allow them into the P.E. cupboard as there is equipment in there which they should not touch. You can use the equipment but get it out yourself.

Some additional things you may find useful following my day with the children:

- Everything done on paper which they can take home or it will be disposed of at the end of the day. Each child should have their own named pencil/pen.
- The children **MUST** be encouraged to social distance as much as possible (2 metres apart).
- Have the doors and windows open as much as possible to allow for free air to flow through.

