

***Learning and living as children of God***

*(Ephesians 5:1)(You are God's children whom he loves. Try to be like God)*

# Deerhurst and Apperley C of E Primary School



## Safeguarding Policy and Child Protection Policy Updated September 2023

Ref KCSIE 2023

Our school vision is: *Learning and Living as children of God (Ephesians 5:1) You are God's children whom he loves. Try to be like God.* At Deerhurst Primary School we have chosen those values that best reflect our thoughts as a school and community

*Friendship*

*Perseverance*

*Respect*

*Trust*

*Thankfulness*

*Truthfulness*

## **Introduction**

At Deerhurst and Apperley C of E School, the health, safety and well-being of all our children are of paramount importance to all the adults who work in our school. Our children have the right to protection, regardless of age, gender, race, culture or disability. They have a right to be safe in our school. All children are encouraged to speak out or speak to someone on their 'worry list' if they are concerned about anything. From the start of school children are encouraged to develop their language of feelings.

In our school we respect all our children. The atmosphere within our school is one that encourages all children to do their best. We provide opportunities that enable our children to take and make decisions for themselves.

All members of the school community fully recognise their responsibilities for child protection. Our policy applies to all staff, governors and volunteers working in the school. It has been written following advice and guidance from the Gloucestershire Safeguarding Children Partnership (GSCP). The guidance also reflects '**Keeping Children Safe in Education, Sept 2023**

**Designated Safeguarding Lead (DSL)**

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**Designated teacher for CiC: Mrs Neveu**

**Safer Recruitment Trained: Mrs J Neveu Mr C Davis and Mrs Hoarau**

**LA (LADO) Mr N Hatton Tel: 01452 426994**

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

[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

[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

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](#)

## Statement of Intent

At Deerhurst and Apperley Primary School we recognise our moral and statutory responsibility to ensure that children are safe and protected from harm. The protection and welfare of the child is the paramount consideration in all our actions. We recognise that because of their day to day contact with children, school staff are well placed to observe the outward signs of abuse.

- This policy has been formulated by staff and governors and supports the principles set out under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and to work together with other agencies to ensure there are adequate arrangements within our school to identify, assess and support those children who are suffering harm, whether mental or physical.
- The school has clearly laid down and recognised procedures for dealing with abuse or suspected abuse which is in line with recommendations made by the Gloucestershire

## Deerhurst & Apperley CE Primary School – Safeguarding Children Policy Sept 2023

Safeguarding Children Partnership, the Local Authority Bulletin Board, Gloucestershire's Working Together,,Department for Education guidance Keeping Children Safe in Education (September 2022), Working Together to Safeguard Children,2018, updated December 2019 ) and The PREVENT duty (June 2015), and guidance offered by national authorities.

- The purpose of this document is to provide staff (including temporary and supply staff), volunteers and governors with the framework they need to keep children safe and secure in our school and to inform parents and carers how we will safeguard their children while they are in our care.

The Gloucestershire Safeguarding Children Partnership has stated: *'The protection and welfare of the child must be the paramount consideration in all action. All professionals in contact with children and their families must be aware of the possibility of child abuse and neglect and of the need to maintain vigilance at all times. Children must be listened to, taken seriously and their comments fully evaluated'*

- Safeguarding and promoting the welfare of children means:
- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. This is defined later in this policy.

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

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

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

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)

A clinical commissioning group for an area within the LA

The chief officer of police for a police area in the LA area

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s)** and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

### Context

Our policy applies to **all staff (including supply staff)**, governors and volunteers working in the school. Safeguarding and child protection is **everyone's** responsibility. There are five main elements to our policy:

- Ensuring we practice safe recruitment in line with Government guidance by using at least one accredited recruiter on all interview panels and by checking the suitability of staff and volunteers to work with children and ensuring any unsuitable behaviour is reported and managed using the Allegations Management Procedure.
- Raising awareness of child protection issues and equipping children with the skills needed to keep them safe.
- Developing and then implementing procedures for identifying and reporting cases, or suspected cases, of abuse by logging welfare concerns and referring to the Children's Helpdesk including notifying of private fostering arrangements and the intention to home school.
- Supporting pupils who have been abused in accordance with his/her agreed Child Protection Plan.
- Establishing a safe environment in which children can learn and develop.

We recognise that because of the day to day contact with children, school staff are well placed to observe the outward signs of abuse. The school will therefore:

- Establish and maintain an environment where children feel secure, are encouraged to talk, and are listened to.
- Ensure children know that there are adults in the school whom they can approach if they are worried.
- Include opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from harm and know who to turn to for help. In particular this will include anti-bullying work, e-safety and other training and in Year 6 prepare for transition to secondary school including substance abuse workshop.

We will follow the procedures set out by the GSCP and take account of guidance issued by the Department of Education to:

- Ensure we have a Designated Safeguarding Lead (DSL) who has received appropriate training and support for this role.
- Ensure we have a nominated governor responsible for child protection who has received appropriate training.
- Ensure all staff receives appropriate training including being conversant with Keeping Children Safe in Education Part 1 September 2022 and any revisions made.
- Ensure every member of staff (including temporary and supply staff and volunteers) and governing body knows the name of the DSL responsible for child protection and their role.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns to the DSL responsible for child protection.
- Ensure that parents have an understanding of the responsibility placed on the school and

staff for child protection.

Develop effective links with relevant agencies and co-operate as required with their enquiries regarding child protection matters including attendance at child protection conferences and core groups.

- Keep written records of concerns about children, even where there is no need to refer the matter immediately.
  - Ensure all records are kept securely; separate from the main pupil file, and in a locked location but that the existence of the additional record is indicated on the main file.
- Develop and then follow procedures where an allegation is made against a member of staff or volunteer including supply or agency workers, contractors or governors.

- Ensure safe recruitment practices are always followed, Inline with KCSIE 2023
- Schools must include a copy of their CP policy and Policy statement of employment of ex-offenders in the application pack – see Recruitment section
- Undertake all necessary checks as to suitability of staff and to maintain a central record.
  - Notify Local Authority Designated Officer for Allegations (LADO) on **01452 426994** for advice if any allegations are made against any member of staff and follow procedures for notification to Disclosure and Barring Service (DBS).

We recognise that children who are abused or witness violence may find it difficult to develop a sense of self-worth. They may feel helplessness, humiliation and some sense of blame. The school may be the only stable, secure and predictable element in the lives of children at risk. When at school their behaviour may be challenging and defiant or they may be withdrawn. The school will endeavour to support the pupil through:

- The content of the curriculum

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

Behaviour policy

Pastoral support system

Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly

- The school ethos which promotes a positive, supportive and secure environment and gives pupils a sense of being valued.
- The school behaviour policy which is aimed at supporting vulnerable pupils in the school. The school will ensure that the pupil knows that some behaviour is unacceptable but they are valued and not to be blamed for any abuse which has occurred.
- Liaison with Families First and all other agencies that support the pupil such as Social Care, Child and Adult Mental Health Service, Education Welfare Service and Educational Psychology Service. To include attendance at case conferences, core meetings and any other multi agency meetings.
- Ensuring that, where a pupil who has a Child Protection Plan leaves, their information is transferred to the new school immediately and that the child's social worker is informed

## **ENCOMPASS COMMITMENT**

As part of School's commitment to keeping children safe we have signed up to implement the principles and aims of the **Gloucestershire Encompass Model**.

In signing up to Gloucestershire Encompass the Governing Body and Senior Leadership Team:

- Endorse the Gloucestershire Encompass Model and support the Key Adults in our school to fulfil the requirements of the Gloucestershire Encompass Protocol.
- Promote and implement Gloucestershire Encompass processes and use these in accordance with internal safeguarding children processes.
- Recognise the sensitive nature of the information provided and ensure that this is retained in accordance with the principles of data protection.

### **Categories of Concern**

**Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

### **Physical Abuse:**

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

### **Sexual Abuse:**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

Physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

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

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

### **Sexual violence and sexual harassment between children in schools**

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)
- Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

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

### **Emotional Abuse:**

Persistent or severe emotional ill treatment or rejection which adversely affects the child's emotional and behavioural development e.g.:

- Conveying to a child that they are worthless, unloved or inadequate
- Overprotection, limiting exploration and learning, preventing normal social interaction or imposing inappropriate expectations
- Causing a child to feel frightened or in danger by the witnessing of violence towards another person whether domestic or not

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

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

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

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

Indicators of CCE can include a child:

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

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

### **CSE**

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

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

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

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

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

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

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

## **County Lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

### **So-called 'honour-based' abuse (including FGM and forced marriage)**

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

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

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

### **FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
  - FGM being known to be practised in the girl's community or country of origin
  - A parent or family member expressing concern that FGM may be carried out
  - A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
  - A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication
- The above indicators and risk factors are not intended to be exhaustive.

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The recently enacted Marriage and Civil Partnership Act 2022 will extend the ambit of the criminal law relating to forced marriage by creating a new offence which makes it illegal to carry out any conduct whose purpose is to cause a child (**aged under 18**) to enter into a marriage before their eighteenth birthday, **whether or not** that conduct involves violence, threats or any other form of coercion or deception. In essence, **it will now always be illegal to cause a child to marry**, whatever the method used, and whether or not the child lacks capacity to consent to marriage.

They will then report this to the DSL.

The DSL will:

Speak to the pupil about the concerns in a secure and private place

Activate the local safeguarding procedures and refer the case to the local authority’s designated officer

Seek advice from the Forced Marriage Unit on 020 7008 0151 or [fmfco@fco.gov.uk](mailto:fmfco@fco.gov.uk)

Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate

All forms of HBA are abuse. HBA is committed to protect or defend the honour of the family and/or the community, and may include female genital mutilation (FGM), forced marriage, and practices such as breast ironing.

- It may involve a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.
- If staff are aware that a child is the subject of HBA or may be at risk of it, they should speak to the designated safeguarding lead (or deputy).
- As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.

### **Female Genital Mutilation (FGM)**

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

Procedures that intentionally alter/injure the female genital organs for non-medical reasons

- May talk about “becoming a woman”, a “spiritual journey”, “something very special that will make me a woman” or similar words.
- A request or talk about an extended holiday or visit to their Country of origin.

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

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her;
- or Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth

Must immediately report this to the police personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

## **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 will 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 their child protection policy and speaking to the designated safeguarding lead or a deputy.

## **Preventing radicalisation**

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

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

**Terrorism** is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

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

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

Staff should **always** take action if they are worried.

The DSL should refer to the Channel programme if a referral is made to them. This will enable early mechanisms to be put in place if it is felt an individual might be vulnerable to radicalisation. The Head teacher has completed training (WRAP) and where appropriate has trained other staff in school. All staff have completed the Channel training online.

### Homelessness

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

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/592993/170206 - Policy Fact Sheets - Threatened with Homelessness.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/592993/170206_-_Policy_Fact_Sheets_-_Threatened_with_Homelessness.pdf)

### Non-collection of children

If a child is not collected at the end of the session/day, school will contact the named contact on the data collection form in order of priority.

## **Domestic Abuse**

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is notified via Operation Encompass with Glos police.

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

Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life. <https://www.nspcc.org.uk/preventing-abuse/child-abuse-and-neglect/domestic-abuse/signs-symptoms-effects/>

## **Recognition of possible abuse**

It is extremely difficult to determine if abuse has occurred. Teachers should look carefully at the behaviour of their children and be alert for significant changes. Any concerns should be noted and discussed with the DSL.

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

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online, and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn't mean that this kind of abuse isn't happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of 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
- 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)

Where children abuse their peers online, this can take the form of, for example, 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 don't want to receive such content.

### **Procedures for dealing with allegations of Child on Child abuse**

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

### **Creating a supportive environment in school and minimising the risk of Child-on-Child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the

curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners

- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns
  - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.
- Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:
  - Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
  - There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

There are films available for parents to view at [www.thinkuknow.co.uk](http://www.thinkuknow.co.uk), the NCA's CEOP Command's education programme designed to help protect children and young people from sexual abuse and exploitation.

### **Types of hazing eg**

- Verbal abuse, including berating of individuals
- Threats or implied threats

Any allegations of peer on peer abuse will be dealt with immediately. Any staff member who becomes aware of this will reassure the child it will be dealt with and report it to the DSL immediately. All systems, then activated, will be processed with the best interest of the child.

### **Children with Special educational Needs and disabilities**

It is important to recognise the additional vulnerabilities of these children. Additional barriers can exist when recognising abuse or 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;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and communication barriers and difficulties in overcoming these barriers.

### **Equality**

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 or health conditions (see section 10)
- 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 (see section 12)
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

## **Sharing of nudes and semi-nudes ('sexting')**

### **Responsibilities when responding to an incident**

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for [all staff](#) and for [DSLs and senior leaders](#)

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

#### **You must not:**

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)

Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

Whether there is an immediate risk to pupil(s)

If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment

If there is a need to contact another school, college, setting or individual

Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)

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

The incident involves an adult

There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

The imagery involves sexual acts and any pupil in the images or videos is under 13

The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

#### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate).

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

#### **Informing parents/carers**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through dialling 101 and informing MASH.

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded.

#### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our Police/internet safety talks (directed at age appropriate content for primary school) and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

Issues of legality

The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

#### **Online safety and the use of mobile technology (also refer to our E-safety Policy)**

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

#### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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

#### **To meet our aims and address the risks above we will:**

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Staff read and sign an acceptable user policy, are trained in CP, Prevent
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety (regular updates are sent out via email during any Home Learning lockdowns)
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, eg
- Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems
- Put in place robust filtering and monitoring systems to limit children's exposure to risks
- This section summarises our approach to online safety and includes our Early Years also.

#### **Filtering and monitoring**

Whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filtering and monitoring systems in place and regularly review their effectiveness. They should ensure that the leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. Governing bodies and proprietors should consider the number of and age

range of their children, those who are potentially at greater risk of harm and how often they access the IT system along with the proportionality of costs versus safeguarding risks.

The governors and staff in school will monitor the safe use of IT by carrying out regular filtering and monitoring checks. These are recorded for checking. All staff will be trained in cyber safety training.

This policy also covers our duty in relation to Early Years

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/974907/EYFS\\_framework\\_-\\_March\\_2021.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/974907/EYFS_framework_-_March_2021.pdf)

### **Children absent from education**

School always makes contact with parents of children who do not attend school by 10am on the day they are not in unless school has received notification of the absence.

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

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

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

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

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

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

### Procedures and responsibilities Access to School

- The school operates entry requirements which are designed to safeguard pupils.
- Visitors have to sign in and out of reception.
- Visitors attention will be drawn to the GSCP leaflet “*Safeguarding Children from abuse and neglect*” and are given the name of the DSL.
- Visitors will receive an ID badge which must be displayed at all times and staff are instructed to challenge any visitors not wearing a badge.
- Reception has a list of known visitors whose DBS we have seen.
- Visitors, volunteers and students or any other person working unsupervised with children will be required to show their ID and DBS unless it has been previously verified.
- If an occasional visitor has contact with children, they will be supervised during their visit and are not allowed to be alone with children.
- The gates to the school are secured for entry and exit at the beginning and end of each school day.

### Statutory Responsibilities

- To report any concerns to DSL. **NEVER ASSUME SOMEONE ELSE HAS REPORTED THE CONCERN**
- Mandatory to report concerns regarding potential for FGM.
- When FGM appears to have been carried out on a girl under the age of 18, there is a statutory duty to report it to the police.

All staff should be aware of procedures to be followed when becoming suspicious of abuse or if told that abuse has taken place, including those in cases where an accusation is made against a member of school's staff.

If a professional has a concern about the well-being of a child then that professional should immediately share their concerns with the DSL to help clarify the nature of their concerns. They should then complete a written record of the nature and circumstances surrounding the concern and include any previous concerns already held,

The procedure route will be the same whether it is a suspicion of abuse or an actual disclosure.

- Allow the child to talk – ask only open questions e.g. ‘*Can you tell me more about..*’

Do not press for detail, put forward your own ideas or use words that the child has not used themselves

- Stay calm and reassuring
- Do not make promises that cannot be kept e.g. confidentiality – tell the child that you will have to tell someone else who will be able to help.
- Believe the child but do not apportion any blame to the perpetrator (it may be someone they love).
- Reassure the child that they were not to blame and they were right to talk to you
- Ask the child if they have told anyone else
- Keep an open mind
- Take notes of the conversation and key facts verbatim at the time of disclosure and write up immediately afterwards. The report must be signed, record the time, date, place and people who were present as well as what was said. It is important that the report is an accurate account as it may be used as evidence in any subsequent court proceedings.
- Establish details of full name, D.O.B. address and names of parents/guardians.
- Report to the DSL or DDSL who will contact the Children's Help Desk as necessary

### **Professional confidentiality**

School will comply with guidance from the Glos LA GDPR (DPO) and GCSP before sharing any information.

Note:

- Timely information sharing is essential to effective safeguarding
- 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
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children  
The DSL should consider that:
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains  
Regarding anonymity,  
all staff will:
- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)

### **Monitoring and Evaluation**

Our Child Protection Policy and Procedures will be monitored and evaluated by:

Head teacher's Report  
Governing Body visits to the school

## Deerhurst & Apperley CE Primary School – Safeguarding Children Policy Sept 2023

The safeguarding governor  
Pupil surveys and questionnaires  
Scrutiny of Attendance data  
Scrutiny of of GB minutes  
Logs of bullying/racist/behaviour incidents for SLT and GB to monitor  
Review of parental concerns and parent questionnaires  
Pupil questionnaires

This policy will be reviewed on an **ANNUAL** basis and links with other policies including:

Acceptable Users Policy  
Accessibility  
Internet Policy  
E-safety  
Anti-bullying  
Attendance Policy  
Mobile Devices Policy  
Behaviour and Exclusion  
Complaints Procedure  
Disability, Discipline  
Equality  
Health & safety  
SEND and Early Help Offer  
RSE  
Children Missing in Education

This policy has been reviewed by staff and Safeguarding governor and presented to governors for approval at the FGB October 2023

HT : Mrs Jayne Neveu                      Signed:

Date: October 2023

Governor responsible for Safeguarding: Mrs K Witney

Signed:

Date: October 2023

Signed:                      Chair of Governors (Mr C Davis)

Date: October 2023

### Appendix 1.

#### **EMERGENCY PROCEDURES**

If the DSL or DDSL are not available, establish the facts and details and contact the Children's Help Desk.

- In cases where you are unsure how to proceed, phone Glos. Children's Help Desk (Glos. **01452 426565**) discuss the situation and ask for advice from a Social Worker Practitioner.
- No names should be given at this stage.
- In cases where you are sure a Social Care assessment is required, make a referral to the Children's Help Desk within 24 hours.

You will be asked to follow up the details of the concern in writing using the Multi-Agency Service Request form which is available in the live version of the Gloucestershire Safeguarding Children Handbook. A portal is now available to do this online

- A social worker may come to school to talk to the child.
- Establish who will be responsible for informing the parents that a referral is being made, unless to do so would place someone at risk of harm
- If concerns are about physical or sexual abuse contact the Children's Help Desk **IMMEDIATELY**

### **Staff records and monitoring**

Well-kept records are essential to good child protection practice. Deerhurst and Apperley Primary School is clear about the need to record any concerns held about a child or children within its care, the status of such records and when these records should be passed over to outside agencies.

#### **What should be recorded?**

- Patterns of attendance
- Changes in mood
- Changes in classroom functioning
- Relationships (with peers, adults)
- Behaviour
- Statements, comments, stories, drawings
- General demeanour and appearance
- Parental interest and comments
- Home/family changes
- Medicals
- Response to PE/sport
- Injuries, marks, past and present

#### **When is recording needed?**

- When there is a concern over the well-being of a child

If a child confides in a member of staff and requests confidentiality it is important that the child is told sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the child's own sake. Within that context the child should however be assured that the matter will be disclosed only to people who need to know.

The procedures are laid down in the GLOUCESTERSHIRE Safe guarding Children Handbook (Child Protection Procedures)

Where abuse is suspected or a sustainable allegation made, teachers and other members of staff should report the information to the DSL.

Staff have a professional responsibility to share relevant information about the protection of children with other professionals, particularly investigating agencies. A member of staff who knows the child best should be prepared to contribute the school's knowledge of the child to a joint agency discussion.

Staff who receives information about children and their families in the course of their work should share that information only within appropriate professional contexts.

The DSL will inform D&A School Governing body as laid down in the GLOUCESTERSHIRE Safeguarding Children's Handbook.

Children identified on the Child Protection Register will be monitored in line with agreed Child Protection Plan. Appropriate personnel who are in direct contact with said child would be informed and notify the Head teacher as part of monitoring process.

Reports prepared for such discussions should focus on the child's educational progress and achievements, attendance, behaviour, participation, relations with other children and, where appropriate the child's appearance. If relevant, reports should include what is known about the child's relations with his or her family and the family structure. Reports should be objective and based on evidence. They should distinguish between fact, observation, allegation and opinion.

### **Listening and talking to children (staff guidance)**

Take what the child says seriously React calmly because over reacting can frighten the child and compound feelings of guilt.

Tell the child they are not to blame. Children often feel guilty.

Explain to the child what will happen next.

Check out your understanding with the child of what has happened if you are not clear what the child is telling you.

Keep questions to a minimum and never lead the child, as leading questions may invalidate the child's testimony in court.

Use the words the child uses (e.g. for different parts of the body). If the child is aware that you are reluctant to use particular words, they may feel reluctant to use the words themselves or may not speak at all.

When talking to children who may have been abused, you need to strike a balance between gathering enough information to establish whether or not there is cause for concern and undertaking an investigation interview which is the responsibility of the investigating agency. Having established that there is cause for concern, it should be possible to postpone a fuller interview until the social worker arrives.

### **Allegations Management Procedure**

The Head teacher and Governors in a case where the Head teacher is accused should consider carefully whether the suspension of the person concerned is appropriate. Suspension should not be automatic. Advice should be sought from LADO on **01452 426994** for an initial discussion. See GSCP flow chart below.

Employers and senior staff have a responsibility to ensure that professional behaviour applies to relationships between staff and pupils. Physical contact is a particular issue where thought is required. With younger children, touching is inevitable and provides reassurance. With older children, perfectly innocent actions can be misconstrued. In emergencies, physical restraint to prevent harm to the pupil or to others can be required.

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, 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 they 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 – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation.

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

Our procedures for dealing with allegations will be applied with common sense and judgement.

### **Suspension of the accused until the case is resolved**

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

Based on an assessment of risk, we will consider alternatives such as:

- 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 the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the LA
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

- 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 to cause harm to the 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 (this does not imply guilt or innocence)
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including

whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.
- Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

**Additional considerations for supply teachers and all contracted staff**

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

**Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

**Specific actions**

**Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

**Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

**Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

The case manager will also consider how best to manage the individual's contact with the child or children who made the allegation, if they are still attending the school.

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

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

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

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

### **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises

### **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff
- The duration of the suspension
- Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks
- 

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly 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
- Humiliating pupils

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

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring 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 concerns
- Empowering staff to self-refer
- 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
- Helping to identify any weakness in the school's safeguarding system
- HT offers an open door policy to all staff

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

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's [staff behaviour policy/code of conduct]. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course

of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority

- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

## **Recruitment and selection process**

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education. Amend or add to this as applicable to reflect your own approach.

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

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

### **Advertising**

When advertising roles, we will make clear:

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

### **Application forms**

Our application forms will follow Gloucestershire guidelines and will include a link or copy of our CP and safeguarding policy and our statement policy on the employment of ex-offenders.

### **Shortlisting**

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
  - Sign a declaration confirming the information they have provided is true
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

### **Seeking references and checking employment history**

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

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees

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

#### **Interview and selection**

When interviewing candidates, we will:

- Record all information considered and decisions made

#### **Pre-appointment vetting checks**

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

##### **New staff**

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate

Ensure they are not subject to a prohibition order if they are employed to be a teacher

Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:

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

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not

carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or

Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

There are concerns about an existing member of staff's suitability to work with children; or

An individual moves from a post that is not regulated activity to one that is; or

There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

We believe the individual has engaged in relevant conduct; or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Agency and third-party staff**

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

### **Contractors**

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

An enhanced DBS check with barred list information for contractors engaging in regulated activity

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

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

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

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

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

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

#### **Trainee/student teachers**

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

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

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

#### **Volunteers**

We will:

Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

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

#### **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

#### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

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

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

#### **Pupils staying with host families**

## Deerhurst & Apperley CE Primary School – Safeguarding Children Policy Sept 2023

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

### **Reporting concerns to Parents**

As a general principle, it is important to be open and honest when dealing with parents. Parents have primary responsibility for the care of their children and in most circumstances parents should be informed as soon as possible about concerns regarding their children. However, in some cases of alleged or suspected child abuse it may not be appropriate for parents to be informed immediately, because it may prejudice the investigation. In such cases concerns should be reported to the Head teacher who will in turn contact the Children's Help Desk.

### **Guidance when listening and talking to parents**

Parents react in many different ways when they hear their child is suspected of being abused. They can feel angry, threatened, indignant, depressed, ashamed or guilty, and it is understandable that people have strong feelings in such circumstances.

When talking to parents who may be highly emotional, it is helpful to:

- Meet parents with the Head teacher
- Be open and honest with parents and tell them the reasons for your concern
- Be very specific regarding the information you may wish to share
- Explain to parents that it is your duty as a teacher to report cases of suspected abuse. It may be helpful to outline to them the procedures, so professional guidelines are adhered to at all times.
- Make a written record of the meeting, what was said and who was present (date/time etc.)

### **Staff Agreed Code of Conduct**

We value the relationships between child/adult and the protection and welfare of the child is the paramount consideration in all our actions.

**Gifts Received:** In the context of fostering understanding and promoting the relationship between adults and children, gifts are deemed acceptable (e.g. Christmas cards etc.). Any concerns/issues as to the appropriateness of receiving/offering a token should be addressed to the Head teacher for guidance.

**Arrangements for PE changing** – boys/girls. The staff need to be sensitive to the requirements of all the children when changing for PE. In certain cases alternative arrangements should be sought. For example, separate facilities for older children with clear procedures for supervision.

### **Individual teachers / individual pupils in classroom situation**

Professional behaviour appropriate to the supervision of individual children should be noted by those involved. Implicit in this would be the avoidance of placing either the member of staff or the child in a compromising situation.

### **Physical contact with pupils**

It is acknowledged that physical contact between adults and children is inevitable and provides reassurance. All adults working with children need to be mindful that perfectly innocent actions can at times be misconstrued. If the adult determines that this has been the case then all concerns need to be reported to the Head teacher immediately. A professional code of conduct is required at all times with respect to the adult and the child.

**Appropriate personnel to be informed regarding first aid etc.**

All staff trained to deliver first aid are listed in appropriate places in school. All staff are aware of the Administering medicines policy.

**Children's attendance**

Procedures for the registration of children should be followed to enable attendance to be monitored by the Head teacher and appropriate external agencies. In order to fulfil the requirements of our Child Protection policy, staff are asked to report any concerns/issues regarding attendance to the Head teacher.

**Supervision of Children off site**

Procedures for Child protection are applied in the event of off-site activities. LA guidance regarding pupil/adult ratio is adhered to and where appropriate professional staff may challenge individuals in the interests of child protection without placing themselves at risk.

As with all school policies the governors fully support the practice of equality of opportunity for all children and with reference to the Discrimination Rights Commission Act (2002)

Further information can be found at Gloucestershire Children Safeguarding Partnership

**Reporting Concerns:**

Children and Families Helpdesk Customer Service 01452 426565

Tewkesbury Families First

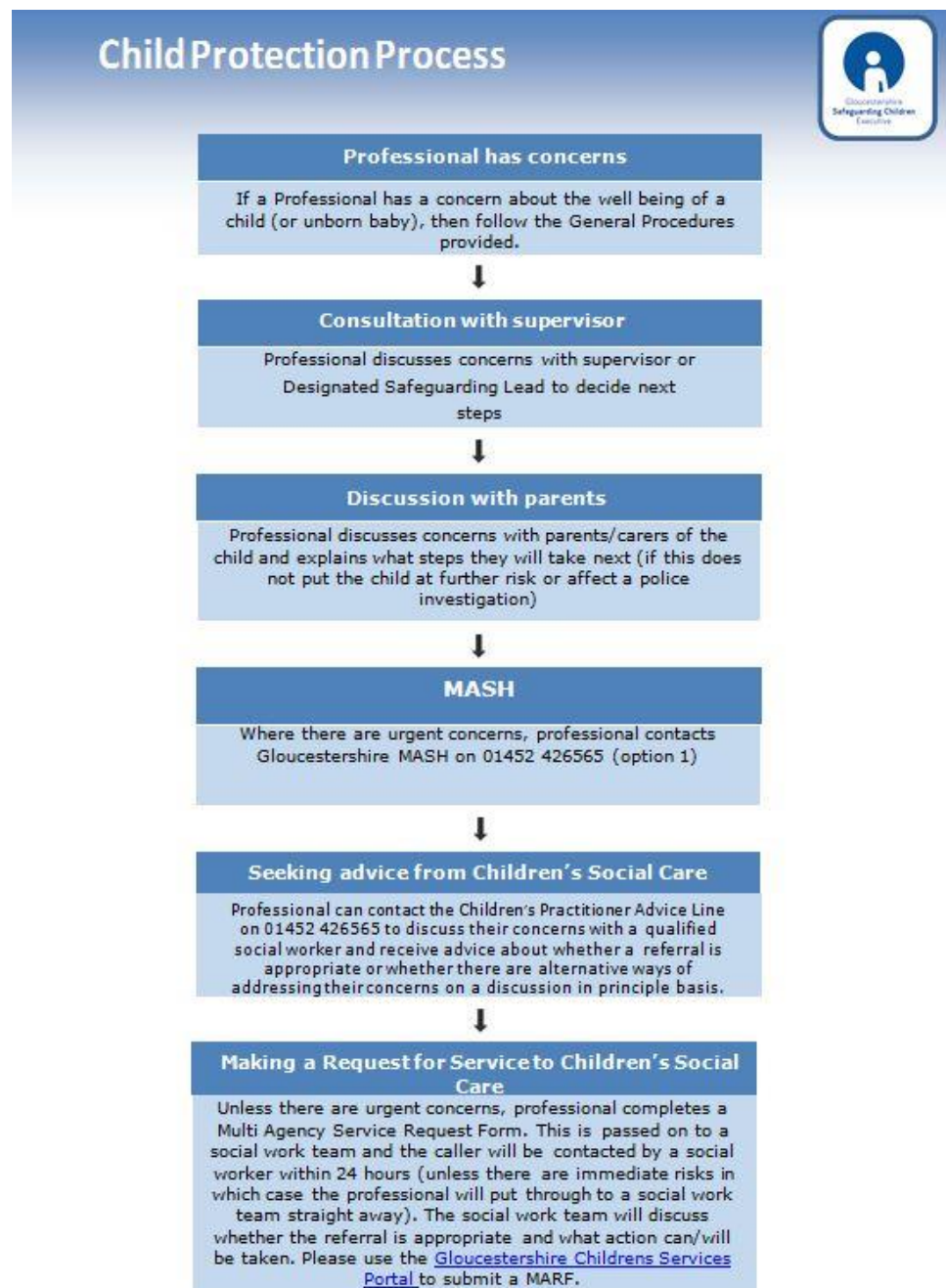
Safeguarding Children Service 01452 583636

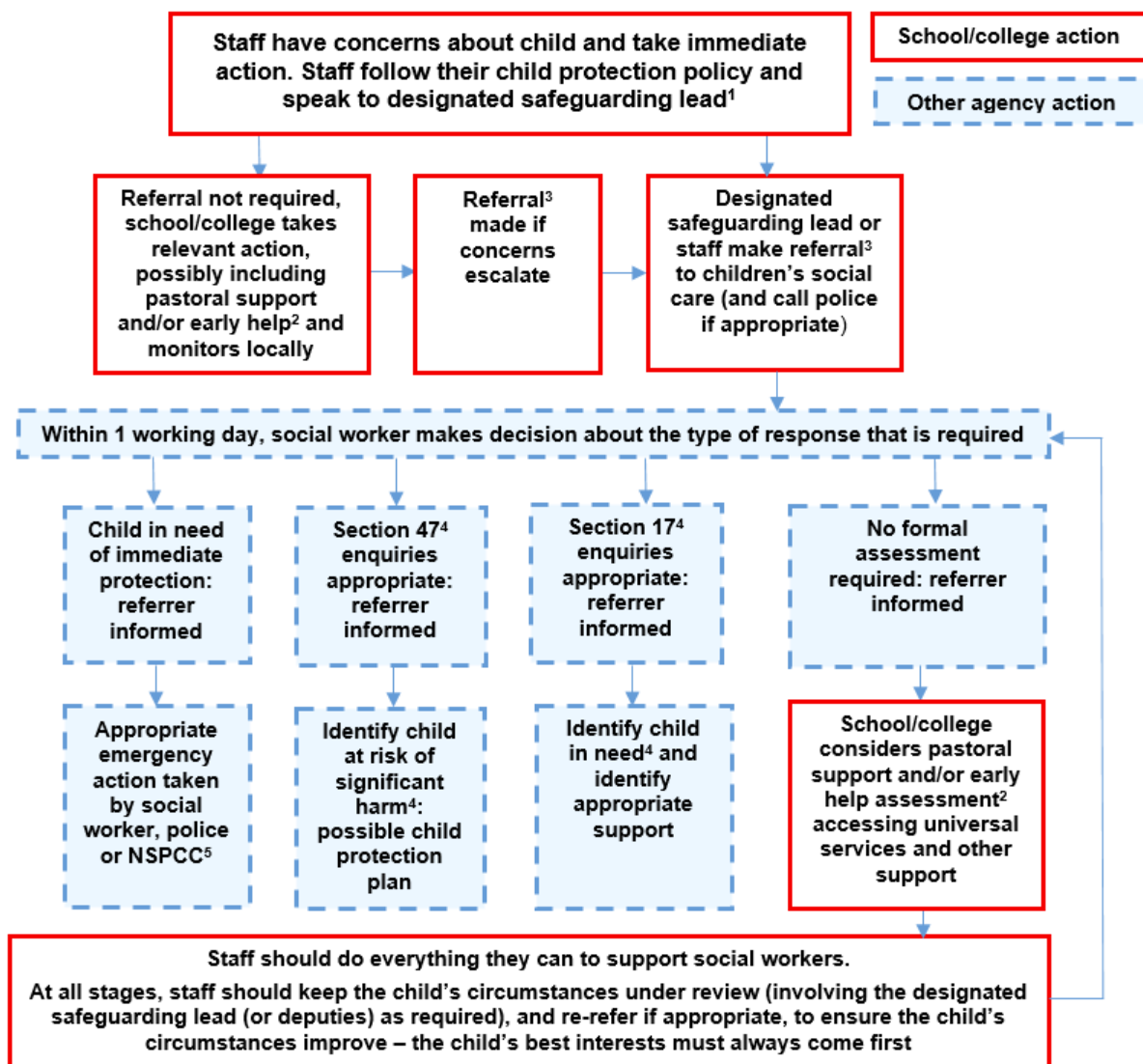
Safeguarding Children Development Officer (Education) 01452 426994

Local Authority Designated Officer for Allegations 01452 426994

## Appendix 2

### Child Protection Process





:

**: Allegations Management Procedures**

**Concerns about a member of staff or a volunteer working with children**

**If a professional receives an allegation of has a concern about the behaviour of a member of staff working**

**or volunteering with children and that concern could amount to:**

- 1. Behaved in a way that has harmed or may have harmed a child.**
- 2. Possibly committed a criminal offence against, or related to a child.**
- 3. Behaved towards a child or children in a way that indicates they may pose a risk of harm to children.**
- 4. Behaved or may have behaved in a way that indicates they may not be suitable to work with children.**

↓

**Report their concerns**

**Report the concern to the most senior person not implicated in the allegation**

↓

**Completion of written record**

**Complete a written record of the nature and circumstances surrounding the concern, including any previous concerns help. Include where the concern came from and brief details only.**

↓

**Seek advice before proceeding – Initial Discussion**

**Always contact the Local Authority Designated Officer (LADO) for advice prior to investigation the allegation. This is because it might meet the criminal threshold and so your investigation could interfere with a Police or Social Care investigation.**

**Local Authority Designated Officer (LADO) – Tel: 01452 426994**

**The LADO will offer advice on any immediate action required and will assist with employment and safeguarding issues**

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**Allegations Management Process**

**If, after your initial discussion with the LADO, it is agreed that the allegation meets the criteria, please complete the allegation management referral form via the GSCE website. [CLICK HERE](#)**

**The LADO will review referrals and convene an allegations management meeting. This might result in a**

criminal investigation, a Social Care investigation and /or an investigation to inform whether disciplinary action is required. If it is agreed that the allegation does not meet the criteria, the LADO will record the initial discussion and send it to you for your records. Any further action will be taken within your setting if necessary.



#### **Further Action**

Further meetings might be required and these will be convened by the LADO, with your input at all times.

Further information on the Allegations Management process can be found in the Government Document:

Working Together to Safeguard Children 2018, Part4 Keeping Children Safe in Education and the South

West

Procedures.

<https://www.proceduresonline.com/swcpp/gloucestershire/contents.html>

## Volunteer's checklist for reporting a disclosure of suspected child abuse:

**Name of Child:**

**Class:**

**Date:**

**Name of volunteer reporting concern:**

**Are there visible signs of a physical nature?**

Please give this to the Designated Safeguard Lead, Mrs Neveu or Mrs Oldroyd/Mrs Perry in their absence please give to class teacher. If none of these are available please give to the office.

Received by:

Date:

## Notification of suspected child abuse – staff referral form

Name of child
Class
Parents name
Home Address
Telephone number
Are you reporting your own concerns?
Are you reporting the concerns of another person?
Details
Signs (physical, behavioural, other?)
Have you spoken to the child?
What was said?
Has anybody been alleged to be the abuser?
If so, give details

Your name\_\_\_\_\_ Date\_\_\_\_\_

Please give to DSL/DDSLs Mrs Neveu or Mrs Oldroyd or Mrs Perry