

# Reach Academy Trust

## Child Protection and Safeguarding Policy 2021-22



*The Trustees, Governors and staff of Reach Academy Feltham fully recognise the contribution it makes to safeguarding children. We recognise that all staff, including volunteers, have a full and active part to play in protecting our students from harm. In this policy 'staff' includes regular volunteers.*

*All Trustees, Governors and staff believe that our Academy should provide a caring, positive, safe and stimulating environment which promotes the social, physical, emotional and moral development of the individual child.*

*At Reach Academy Feltham we aim to foster an ethos in which children feel secure, their viewpoints are valued and they are encouraged to talk and are listened to. We are responsible for creating a safe and healthy environment for students.*

*It is the responsibility of all members of staff to provide a safe environment in which students may develop their self-esteem and respect for one another. It is important that we use the curriculum (both 'overt' and 'hidden') to raise students' awareness of the support networks around them, allowing them to build confidence in accessing a range of contacts and strategies to ensure their own protection, whilst understanding the importance of protecting others, and develop more responsible attitudes to adult life and parenthood.*

*Local Authority Child Protection Guidelines are held in the Academy for reference.*

Approved by: Judith Tacon , Chair of Trustees

Date: 29th September 2021

Last reviewed on: 30th June 2021

Next review due by: September 2022

## Contents

1. Designated Safeguarding Lead/ Important Contacts	3
2. Aims	3
3. Legislation and statutory guidance	4
4. Definitions	4
5. Equality statement	5
6. Roles and responsibilities	5
7. Confidentiality	7
8. Recognising abuse and taking action	8
Explain what you are unhappy about and what you would like to happen to put it right	10
9. Mental Health	11
9. Whistleblowing	13
10. Allegations of abuse made against other pupils	13
10.1 Sexting/ Youth produced imagery/Sexting	14
10.2 Sexual violence and sexual harassment	16
11. Recording incidents	17
12. Curriculum coverage	17
13. Notifying parents	17
14. Pupils with special educational needs and disabilities	17
15. Pupils with a social worker	18
16. Designated Teacher for Looked After Children (LAC) and Previously Looked After Children (PLAC)	18
17. Mobile phones and cameras	19
18. Contextual safeguarding	19
19. Student pregnancy	19
20. Record keeping	19
21. Training	20
24. Education at home	21

25. Lone Working	21
26. Safer Recruitment	23
27. Links with other policies	32
22. Appendices	32

---

## 1. Designated Safeguarding Lead/ Important Contacts

Role	Name	Contact details
Designated safeguarding Lead	Georgia Strong	<a href="mailto:georgia.strong@reachacademy.org.uk">georgia.strong@reachacademy.org.uk</a> 02088931099 (Academy Mainline)
Acting DSL	Camila Douglas	<a href="mailto:camila.douglas@reachacademy.org.uk">camila.douglas@reachacademy.org.uk</a> 02088931099 (Academy Mainline)
Designated Deputy safeguarding lead	Jerome Barlow	<a href="mailto:jerome.barlow@reachacademy.org.uk">jerome.barlow@reachacademy.org.uk</a> 02088931099 (Academy Mainline)
Designated Deputy safeguarding lead	Alice Whitehouse	<a href="mailto:alice.whitehouse@reachacademy.org.uk">alice.whitehouse@reachacademy.org.uk</a> 02088931099 (Academy Mainline)
Nominated governor for safeguarding, child protection and looked after children	Emma Luxton	<a href="mailto:Emma.luxton@reachacademy.org.uk">Emma.luxton@reachacademy.org.uk</a>
Chair of Governors	Tom Sawbridge	<a href="mailto:thomas.sawbridge@reachacademy.org.uk">thomas.sawbridge@reachacademy.org.uk</a>

## 2. Aims

Our school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are properly trained in recognising and reporting safeguarding issues.
- To support the child's development in ways that will foster security, confidence and independence.
- To raise the awareness of both teaching and non-teaching staff of the need to safeguard children and of their responsibilities in identifying and reporting possible cases of abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm.

- To emphasise the need for good levels of communication between all members of staff. To develop a structured procedure within the Academy which will be followed by all members of the Academy community in cases of suspected abuse.
- To develop and promote effective working relationships with other agencies, especially the Police and Social Services.
- To ensure that all adults within our Academy who have access to children have been checked as to their suitability.
- To safeguard children, young people and families who access services and support through the Reach Children's Hub.

### 3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children board.

This policy is also based on the following legislation:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) Regulations 2009](#) 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](#).
- Children and Families Act 2014
- London Child Protection Procedures ( 5th Edition)
- Protecting adults at risk: London multi-agency policy and procedures to safeguard adults from abuse 2014 – Pan London Adult Safeguarding

This policy also complies with our funding agreement and articles of association.

### 4. Definitions

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. Appendix 1 explains the different types of abuse.

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. Appendix 1 defines neglect in more detail.

Sexting (also known as Youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children/young people include everyone under the age of 18.

Vulnerable Adult Person a person aged 18 or over who:

- is in need of community care services because of a disability, age, illness or addiction and is unable to take care of him or herself.
- is unable to stop someone else from harming or exploiting them.
- has a learning disability, mental health needs, a physical or sensory impairment or may be elderly and frail.

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

## 5. Equality statement

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

We give special consideration to children who:

- Have special educational needs or disabilities;
- 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

## 6. Roles and responsibilities

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

### 6.1 All staff

All staff will read and understand part 1 of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), FGM and radicalisation. Section 12 and appendix 3 of this policy outline in more detail how staff are supported to do this.

### 6.2 Designated Safeguarding Lead

The DSL is a member of the senior leadership team. Our DSL is Georgia Strong, Assistant Headteacher : Culture and Relationships. The DSL takes lead responsibility for child protection and wider safeguarding.

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

If necessary the DSL can be contacted out of school hours on her school email address, [georgia.strong@reachacademy.org.uk](mailto:georgia.strong@reachacademy.org.uk) When the DSL is absent, the deputies – Camila Douglas (acting DSL whilst Georgia Strong is on Maternity leave), Alice Whitehouse and Jerome Barlow – will act as cover. Add CDO

If the DSL and deputies are not available, Rebecca Cramer, Executive Headteacher will act as cover (for example, during out-of-hours/out-of-term activities).

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

The DSL will also keep the headteachers informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities of the DSL and deputies are set out in their job description.

The DSL will also keep the Executive Headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

### 6.3 The Trustees

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

The Trustees will appoint a senior board level (or equivalent) lead to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Headteacher, where appropriate (see appendix 2).

All Trustees and local governors will read Keeping Children Safe in Education.

Section 15 of this policy has information on how Trustees and governors are supported to fulfil their role.

### 6.4 Executive Headteacher

The Executive Headteacher is responsible for the implementation of this policy (delegating day to day responsibility to the DSL) including:

- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction;
- Communicating this policy to parents when their child joins the school and via the school website;
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent;
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly;
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2);
- Ensuring the relevant staffing ratios are met, where applicable;
- Making sure each child in the Early Years Foundation Stage is assigned a key person.

## 7. Confidentiality

We recognise that all matters relating to Child Protection are confidential. The Designated Child Protection Officers, or other senior staff will disclose any information about a student to other members of staff on a need to know basis only.

Confidential information about pupils must be held securely. Confidential information about pupils must not be held off the school site other than on security protected school equipment. All paper documents with pupil's personal information must be put in confidential waste when no longer required. If a member of staff is in any

doubt about the storage of sharing of information s/he must seek guidance from a member of the Leadership Team. Any media or legal enquiries must be passed to the Headteacher.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. All staff must be aware that they cannot promise a child to keep secrets.

Reach Academy notes that:

- 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 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
- 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 designated safeguarding lead (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 2

## 8. Recognising abuse and taking action

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

### 8.1 If a child is in immediate danger

Make a referral to children's social care and/or the police immediately if a child is in immediate danger or at risk of harm. Anyone can make a referral.

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

Hounslow Procedures:

If you think that a child or young person is at risk from abuse or neglect, contact us immediately.

If you feel urgent action is needed contact the police on 999.

If you suspect ill treatment of a child or young person you can:

- Contact Children's Services on 020 8583 6600 option 2

It is important to act fast if you suspect abuse as some signs of abuse can disappear quickly. If you are uncertain, you might find it helpful to discuss your worries with someone you know who works with children and families. This could be a teacher, school nurse, health visitor or social worker.

- Their office is open Monday to Thursday 9am to 5pm, Friday 9am to 4.45pm
- Telephone 020 8583 6600 option 1
- Out of hours (after 5pm weekdays or weekends) call 020 8583 2222 and ask to speak to the duty social worker.



You do not have to give your name and your conversation will be treated confidentially.

To report child abuse to your local council: <https://www.gov.uk/report-child-abuse-to-local-council>

## 8.2 If a child makes an allegation to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Record on CPOMS (within 24 hours) and pass it on to the DSL (as soon as possible). Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so.

## 8.3 If you discover FGM or that FGM has taken place or a pupil is at risk of FGM

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 3.

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 teacher who discovers that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty 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 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.

Any member of staff who suspects a pupil is *at risk* of FGM a pupil age 18 or over appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures. This will include contacting Children's Services on 020 8583 6600 and calling Call the FGM helpline on 0800 028 3550 or emailing [fgmhelp@nspcc.org.uk](mailto:fgmhelp@nspcc.org.uk).

## 8.4 If you have concerns about a child (as opposed to immediate danger)

Figure 1 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger. Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below). You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

## 8.5 Early Help

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

- Hounslow Early Help:
- Early Help Hub Children's,
- Health and Adults' Services 5th Floor,
- Hounslow House Bath Road,
- Hounslow, TW3 3EB
- Opening Hours: 9am to 5pm Monday to Friday
- Tel: 020 8583 6653
- Email: [earlyhelphub@hounslow.gov.uk](mailto:earlyhelphub@hounslow.gov.uk)

## 8.6 Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly, you must tell the DSL as soon as possible. The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

We have the right to complain about Children's services:

- if you have been refused a service
- if you are unhappy about the service you receive

### Escalation Process

- Tell the manager of the service, or call the customer relations team on 020 8583 3333
- Explain what you are unhappy about and what you would like to happen to put it right
- We will contact you within three working days to talk about your complaint.
- You will receive a written response to your complaint in 10 to 20 working days.
- If you are not satisfied with the response call the customer relations manager on 020 8583 3333.
- [For further information about the Children's Statutory Complaint process](#)

## 8.7 Concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

## 9. Mental Health

All staff at Reach must be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

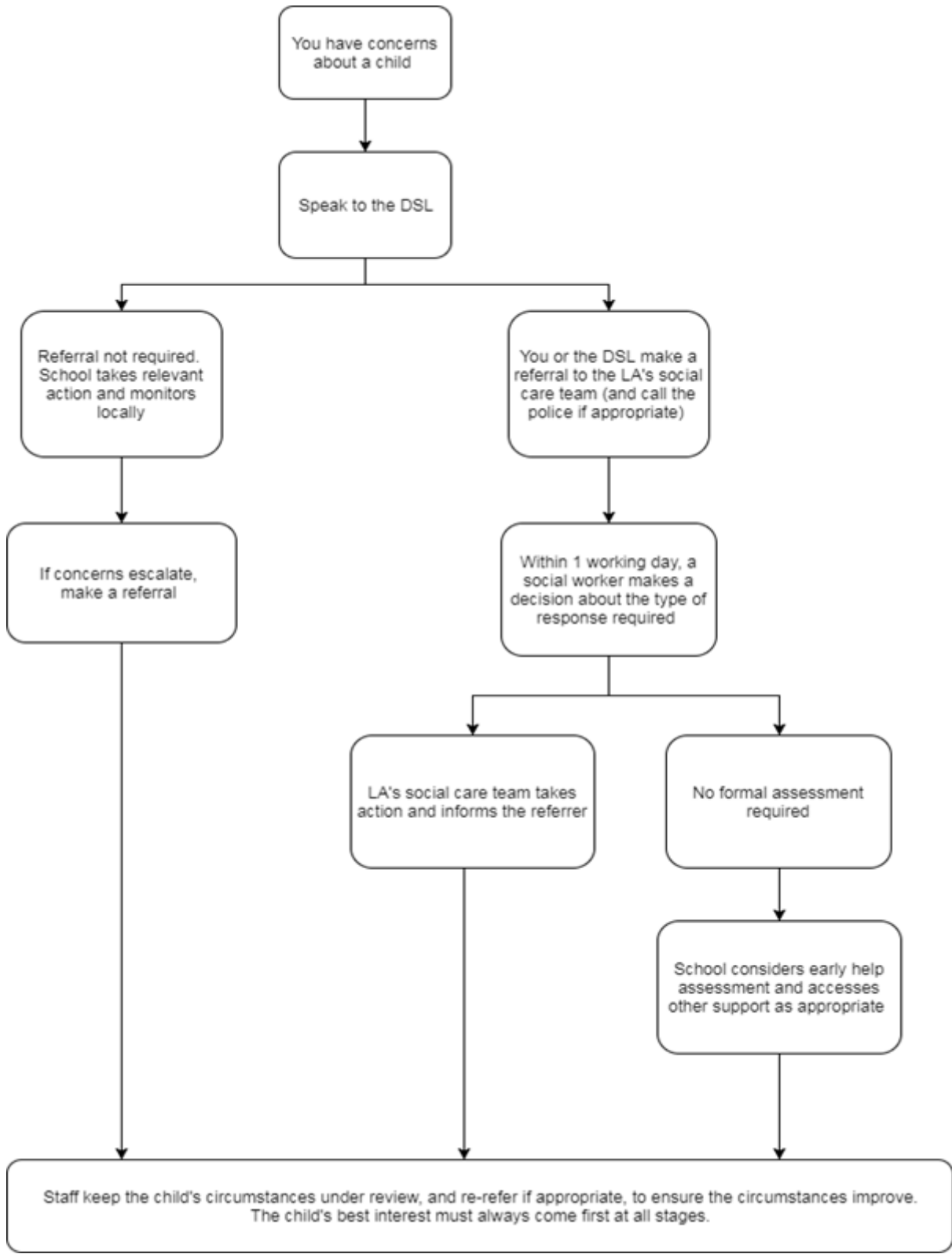
Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour and education.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.2.

If you have a mental health concern that is not also a safeguarding concern, speak to the DSL to agree on a course of action. Please see the mental health policy for more information.

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

(Note – if the DSL is unavailable, this should not delay action. See section 8.1 for what to do.)



## 9. Whistleblowing

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. All staff should be aware of their duty to raise concerns, where they exist, about the attitudes and actions of colleagues. The whistleblowing policy is in the staff handbook.

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 2).

### 9.1 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, speak to the Executive Headteacher. If you have concerns about the Executive Headteacher, speak to the Chair of Governors. You can also discuss any concerns about any staff member or volunteer with the DSL. The Executive Headteacher/chair of governors/DSL will then follow the procedures set out in appendix 2, if appropriate.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary time scale (see appendix 2 for more detail).

We recognise that staff working in the Academy who have become involved with a child who has suffered harm, or appears to be likely to suffer harm may find the situation stressful and upsetting. We will support such staff by providing an opportunity to talk through their anxieties with the designated teacher and to seek further support as appropriate.

### 9.2 Allegations against staff

We understand that a student may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Executive Headteacher.

If the allegation made to a member of staff concerns the Executive Headteacher, the designated officer will immediately inform the Chair of Governors. If it concerns the Primary/Secondary Headteacher, the Executive Headteacher will be informed.

If a member of staff is dismissed following an allegation, or if an allegation is taken seriously but the member of staff is not dismissed, the Academy will inform the Independent Safeguarding Authority.

The Academy will follow the LA procedures for managing allegations against staff, a copy of which will be readily available in the Academy.

There is guidance on how to manage a staff allegation, this includes contacting information for our Safeguarding Advice and Allegations Management (SAAM). This is saved on the shared drive with access to all staff.

#### 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.

Concerns that do not meet the harm threshold:

This 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 in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- 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
- Using inappropriate sexualised, intimidating or offensive language
- Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to 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 as per section 7.7 of this policy
- 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

Responding to low-level concerns:

If the concern is raised via a third party, the Executive 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 Executive headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct

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

## 10. Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously. Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

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

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 10.1 Sexting/ Youth produced imagery/Sexting

This is a suggested approach based on [guidance from the UK Council for Internet Safety](#) for all staff and for DSLs and senior leaders. Amend or add to this as applicable to reflect your own approach.

### Your responsibilities when responding to an incident

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

#### You must not:

- View, 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. The decision will be made and recorded in line with the procedures set out in this policy.

#### 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

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

#### Referring to the police

If it is necessary to refer an incident to the police, this will be done through our safer schools officer, PC Sam JOHNSTON – Samantha.L.Johnston2@met.police.uk – 07387 257 416 or dialling 101

## 10.2 Sexual violence and sexual harassment

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. 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. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

It can happen in secret, but can also be garnered as an aspect of school life. It can change from relatively harmful rituals to very dangerous in a short period of time.

There are clear physical dangers and the emotional effects can be far-reaching and long-lasting. Hazing is not acceptable and will not be tolerated at Reach Academy, staff will never dismiss hazing as a "rite of passage" or "harmless fun"

Reach Academy fosters a culture of open communication – reporting concerns is never be seen as "snitching", and pupils are supported to be able to report concerns without being resented or mistrusted by their peers

In the event of a known or suspected incident, follow the school's safeguarding and behaviour policies and procedures – including reporting to the police and/or children's social care if necessary. Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and

safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including youth produced imagery)
- If a pupil makes an allegation of abuse against another pupil:
- You must tell the DSL and record the allegation, 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 – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Please see Reach Academy's Behaviour policy and additional guidance on Sexual Violence and Sexual Harassment for further information.

## 11. Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording incidents of sexting.

## 12. Curriculum coverage

The below is provided as an example of how you might demonstrate the way your curriculum covers sexting. Insert details of your own approach here.

Pupils are taught about the issues surrounding sexting as part of our Team Reach curriculum. Teaching covers the following in relation to sexting:

- 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

This policy on sexting is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### 13. Notifying parents

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

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

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

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

### 14. Pupils with special educational needs and disabilities

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

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

### 15. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

### 16. Designated Teacher for Looked After Children (LAC) and Previously Looked After Children (PLAC)

The Designated Teacher for LAC and PLAC children is Georgia Strong and Alice Whitehouse .

Staff at Reach Academy recognise that LAC and PLAC remain vulnerable and it's important that all agencies work together to safeguard them. This group of students are extremely vulnerable, the most common reason for

children becoming looked after is as a result of abuse and/or neglect and the school is aware of the need to monitor the welfare and ensure the support of children that fall into this category. Staff at Reach Academy are also aware that these experiences can leave children with complex emotional and mental health needs and this can increase their vulnerability to abuse. At Reach Academy we will work with all agencies and will use the students PEP's and LAC reviews as a supportive measure to make sure their welfare and safety is paramount at all times.

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads
- Georgia Strong and Alice Whitehouse is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

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

## 17. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils. Staff will not take pictures or recordings of pupils on their personal phones or cameras. Some staff have school owned phones and these may be used in the presence of pupils.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

## 18. Contextual safeguarding

Staff at Reach Academy take a holistic view to ensure wider environmental factors are considered that may be a threat to safety and welfare of children.

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships.

Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse in a range of social contexts.

## 19. Student pregnancy

If a student tells a member of staff that they are pregnant it must be reported to the Academy's Designated Child Protection Officer. The Academy's Designated Child Protection Officer will meet with the student to assist them to inform their parents. If the student is under 15 the Academy's Designated Child Protection Officer must report the case to Social Services. The Academy must contact the family if there is a suspicion of pregnancy. Appropriate outside agencies may be involved to offer counselling and support

The date for the student to begin leave of absence from the Academy is at the discretion of the Headteacher and must be within the parameters of legislation. The Borough may offer Home Tutors. Academy staff will encourage students to maintain their education and to sit examinations.

Whilst in the Academy the student should be in all lessons and in Academy uniform throughout. We must have authorised absence for maternity (antenatal) appointments.

## 20. Record keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

Add further information about your safeguarding record-keeping arrangements – for example:

All Records are electronically based with student concerns being recorded on CPOMS and staff concerns being recorded on Staffsafe

All records are kept secure as both CPOMS and Staffsafe allow the DSL to securely control who has access to what information and when. Therefore all records are kept confidential.

We will archive the electronic records when staff and children leave the school. If a child leaves Reach Academy all electronic files will be transferred securely to the new school.

We share information with other agencies as and when this is appropriate, in line with your local safeguarding procedures. For example we will share information with Children's services when we feel there is a risk to the students. Where possible, we will share information with consent, and where possible, respect the wishes of those who do not consent to having their information shared. Under the GDPR and Data Protection Act 2018

you may share information without consent if, in your judgement, there is a lawful basis to do so, such as where safety may be at risk. You will need to base your judgement on the facts of the case. When we are sharing or requesting personal information from someone, we are clear of the basis upon which you are doing so. Where we do not have consent, we are mindful that an individual might not expect information to be shared.

Section 26 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks

Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

In addition:

- Appendix 2 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 21. Training

### 21.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

- All new members of staff will be given a copy of our Safeguarding and child protection procedures as part of their induction into the Academy.
- All members of staff will be asked to read Keeping Children Safe in Education 2016. New members of staff will receive this in their induction.
- If a member of staff reveals a sexual attraction towards young people, or if safeguarding-related incidents from their past come to light that require investigation, the member of staff will be suspended with immediate effect while the Academy seeks advice.
- If a member of staff is dismissed for safeguarding-related matters, or if a safeguarding-related allegation is taken seriously but this does not lead to dismissal, the Academy will report this to the Independent Safeguarding Authority

This training will be regularly updated and will be in line with advice from our local safeguarding children's board.

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

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

### 21.2 The DSL and deputies

The DSL will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins,

meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

### 21.3 Trustees and Governors

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

### 22.4 Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

### 23.5 Staff who have contact with pupils and families

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

### 24. Education at home

Where children are being asked to learn online at home the department of Education has provided advice to support schools and colleges do so safely:

- [safeguarding-in-schools-colleges-and-other-providers](#)
- [safeguarding-and-remote-education](#)

Our Safeguarding policy in relation to distance learning will then be applied.

<https://drive.google.com/drive/u/0/search?q=distance%20learning%20safeguarding>

### 25. Lone Working

Where the conditions of service delivery or its associated tasks require staff to work alone, both the individual staff member and their Line Manager have a duty to assess and reduce the risks which lone working presents. This policy should be read in conjunction with the Health & Safety and Safeguarding policies.

This policy highlights areas of potential risk and ways of minimising this risk when visiting people in their own homes, and other settings as a lone worker. This policy is designed to alert staff to the risks presented by lone working, to identify the responsibilities each person has in this situation, and to describe the procedures which will minimise such risks. It is not intended to raise anxiety unnecessarily, but to give staff a framework for managing potentially risky situations.

Some staff work outside office hours and/or alone due to the nature of their role (i.e. home visits). Reach's principles for supporting lone workers include:

- a commitment to supporting staff and managers both in establishing and maintaining safe working practices
- recognising and reducing risk
- a commitment to the provision of appropriate support for staff
- a clear understanding of responsibilities

- the priority is placed on the safety of the individual over property
- a commitment to providing appropriate training for staff
- equipment such as mobile phones will be made available as appropriate

## 25.1 Definition

Within this document, 'lone working' refers to situations where staff in the course of their duties work alone or are physically isolated from colleagues and without access to immediate assistance.

## 25.2 Personal safety

- Staff should take all reasonable precautions to ensure their own safety, as they would in any other circumstances.
- Home visits should only be attended alone to families which the member of staff has a good working relationship with. Approval should be obtained from SLT before initial home visit is arranged.
- Before working alone, an assessment of the risks involved should be made in conjunction with the Line Manager.
- Staff running or attending sessions off-site must inform their Line Manager if when they arrive and when they leave the location.
- If a member of staff does not report back to work expected, an agreed plan should be put into operation, initially to check on the situation and then to respond as appropriate using emergency contact information if necessary.
- Staff working away from the office should ensure that they have access to a mobile phone at all times. Staff may use their own mobile phone for the purpose of contacting their Line Manager or SLT. Staff are responsible for checking that the mobile phone is charged and in working order.

## 25.3 Assessment of risk

In drawing up and recording an assessment of risk, the following issues should be considered, as appropriate to the circumstances:

- The environment – location, security, access
- The context – nature of the task, any special circumstances
- The individuals concerned – indicators of potential or actual risk
- History – any previous incidents in similar situations
- Any other special circumstances

All available information should be taken into account and checked or updated as necessary. Where there is any reasonable doubt about the safety of a lone worker in a given situation, consideration should be given to sending a second worker or making other arrangements to complete the task.

## 25.4 Planning

Staff should add scheduled outreach meetings to their calendar and invite their Line Manager/SLT. On the day of the meeting, the member of staff should call or text to ensure the person/s are still available to meet. Communication, checking-in and fall back arrangements must be in place. Staff should ensure someone is always aware of their movements and expected return time.



## 25.5 Staff working at home

Staff working from their own homes should take every reasonable precaution to ensure that their address and telephone number remain confidential. Staff working from home should be in regular contact with their Line Manager or other designated person if working at home for extended periods. Managers should be particularly aware of the importance of such arrangements for staff that live alone.

## 25.6 Guidance for Home Visits

Details of the home visit/s should be given to the Line Manager and SLT within the calendar invite.

Staff visiting should be fully acquainted with the location of the home and how to get there to avoid having to stop and ask for directions. Staff should have the appropriate insurance cover as such visits are regarded as 'business' by insurance companies.

If staff are anxious on arriving at a location and feel their safety could be jeopardised, they should not take the risk of proceeding further. They should telephone the home and advise that they are unable to attend. Alternative arrangements should be made.

As you enter, ask the person to lead the way so you are behind them, not the other way round. If possible, sit so you have a clear exit to the door and the young person / family member is not between you and it. Do not go upstairs or into any bedrooms.

All home visits should be recorded on CPOMS with the reason of the visit, points discussed, agreements reached and any concerns that the member of staff may have from the meeting, however trivial these may appear at the time. Clear and detailed record keeping may well prevent problems in the future.

Travel plans should only be changed if relevant staff have been alerted. Staff may consider the carrying of a personal alarm.

Public transport is a poor option for home visits since a great deal of personal control is taken away. Only a thorough risk assessment should allow for the use of buses, taxis and trains.

Confrontation should always be avoided. At the first sign of potential danger the staff member should exit from a home as personal safety is paramount. Any incident should be reported to the Line Manager immediately.

Visiting staff are reminded to keep up-to-date with current legislation and safeguarding training.

## 25.7 Practice Guidance – Personal Safety

'Reasonable precautions' might include:

- checking directions for the destination
- ensuring your car, if used, is road-worthy and has break-down cover
- avoiding where possible poorly lit or deserted areas
- taking care when entering or leaving empty buildings, especially at night
- ensuring that items such as laptops or mobile phones are carried discreetly

## 25.8 Monitoring and Review

Any member of staff with a concern regarding lone working issues should ensure that it is discussed with their manager or with the whole team, as appropriate.

## 26. Safer Recruitment

The purpose of safer recruitment is to set out the minimum requirements of a recruitment process that aims to:

- Be robust in protecting both children and young people and those adults working with them;
- attract the best possible applicants to vacancies;
- Deter prospective applicants who are unsuitable for work with children or young people; and
- Identify and reject applicants who are unsuitable for work with children and young people.
- The Governors fully recognise that applicants of both sexes and of all racial groups have a right to equal opportunity in employment. The Equality Act 2010 makes it unlawful to discriminate against an applicant for employment, or an existing employee, on the grounds of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation.
- The Governing Body regards its staff as its most important asset. It is the policy of the Governing Body to ensure an adequate supply of suitably qualified and experienced staff to meet the school's human resource requirements and to deliver the school development plan.

### 26.1 Statutory

Schools should have written recruitment and selection policies and procedures in place.

This is set out in paragraph 71 of Keeping Children Safe in Education, which is statutory safeguarding guidance from the Department for Education (DfE) and applies to maintained schools and independent schools (including academies).

For all roles, the schools will have at least one recruiter who has successfully received accredited training in safe recruitment procedures.

### 26.2 Inviting applications

Advertisements for posts – whether in newspapers, journals or on-line will include the statement

“Reach Academy is committed to safeguarding and promoting the welfare of children and young people. In order to meet this responsibility all candidates will be subjected to a rigorous selection process to discourage and screen out unsuitable applicants.”

Prospective applicants will be supplied with, or pointed to, the following:

- job description and person specification;
- the school's child protection policy (this document);
- the selection procedure for the post;
- self-declaration of criminal records;
- an application form.

All prospective applicants must complete, in full, an application form.

### 26.3 Shortlisting and references

Short-listing of candidates will be against the person specification for the post and carried out by two people.

Shortlisted candidates for interview will be asked to give consent for Reach Academy to seek references from the current/previous employer. Where appropriate, references will be taken up before the selection stage, so that any discrepancies can be probed during the selection stage.

References will be sought directly from the referee. References or testimonials provided by the candidate will never be accepted.

A self-declaration form must be completed by a shortlisted applicant. Applicants should be asked to sign a declaration confirming the information they have provided is true. Where there is an electronic signature, the shortlisted candidate should physically sign a hard copy of the application at point of interview. The purpose of a self-declaration is so that candidates will have the opportunity to share relevant information and allow this to be discussed and considered at interview before the DBS certificate is received.

Where necessary, referees will be contacted by telephone or e-mail in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

Where necessary, previous employers who have not been named as referees will be contacted in order to clarify any anomalies or discrepancies. A detailed written note will be kept of such exchanges.

Referees will always be asked specific questions about:

- the candidate's suitability for working with children and young people;
- any disciplinary warnings, including time-expired warnings, that relate to the safeguarding of children;
- the candidate's suitability for this post.

School employees are entitled to see and receive, if requested, copies of their employment references. To get copies they simply need to ask a member of the administration team who will be able to assist them.

The purpose of seeking references is to allow employers to obtain factual information to support appointment decisions. Schools and colleges should obtain references before interview, this allows any concerns raised to be explored further with the referee and taken up with the candidate at interview.

We will:

- not accept open references e.g. to whom it may concern;
- not rely on applicants to obtain their reference;
- ensure any references are from the candidate's current employer and have been completed by a senior person with appropriate authority (if the referee is school or college based, the reference should be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations);
- obtain verification of the individual's most recent relevant period of employment where the applicant is not currently employed;
- secure a reference from the relevant employer from the last time the applicant worked with children (if not currently working with children), if the applicant has never worked with children, then ensure a reference from their current employer;
- always verify any information with the person who provided the reference;
- ensure electronic references originate from a legitimate source;
- contact referees to clarify content where information is vague or insufficient information is provided;
- compare the information on the application form with that in the reference and take up any discrepancies with the candidate;
- establish the reason for the candidate leaving their current or most recent post; and,
- ensure any concerns are resolved satisfactorily before appointment is confirmed.

When asked to provide references we will ensure the information confirms whether we are satisfied with the applicant's suitability to work with children and provide the facts (not opinions) of any substantiated safeguarding allegations but should not include information about allegations which are unsubstantiated, unfounded, false, or

malicious. References are an important part of the recruitment process and should be provided in a timely manner and not hold up proceedings.

## 26.4 The Selection Process

Selection techniques will be determined by the nature and duties of the vacant post, but all vacancies will require an interview of short-listed candidates.

Interviews will always be face-to-face. Telephone interviews may be used at the short-listing stage but will not be a substitute for a face-to-face interview (which may be via visual electronic link).

Candidates will always be required:

- to explain satisfactorily any gaps in employment;
- to explain satisfactorily any anomalies or discrepancies in the information available to recruiters;
- to declare any information that is likely to appear on a DBS disclosure;
- to demonstrate their capacity to safeguard and protect the welfare of children and young people.
- Candidates shortlisted for interview will be required to disclose their criminal convictions and/or cautions which are not protected under the amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) that may make them unsuitable.

We will agree structured questions which will include: finding out what attracted the candidate to the post being applied for and their motivation for working with children; exploring their skills and asking for examples of experience of working with children which are relevant to the role.

## 26.6 Induction

All staff who are new to the school will receive induction training that will include the Academy's safeguarding policies and guidance on safe working practices.

Regular meetings will be held during the first 6 months of employment between the new employees and the appropriate managers.

## 26.7 Volunteers, Community, Contractors and Other Agencies

Anyone having direct or close contact with children, and who will be unsupervised, will be required to undertake an Enhanced DBS check or demonstrate, with evidence, that disclosure has been undertaken.

Community volunteers will always be closely supervised if they have contact with children unless they have appropriate DBS clearances.

Other agencies will be asked to guarantee that their workers have appropriate clearances and vetting. If they are unable to do this, then the individuals will be constantly supervised if they are likely to have contact with children or young people.

Contractors will be briefed about the rules that apply to their presence on the site including safeguarding children. If a contractor is likely to be close to children, then the site supervisor or his staff will constantly supervise them.

## 26.8 Safer recruitment procedures

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.

### 26.8.1 New staff

When appointing new staff, we will:

- Verify their identity (best practice is checking the birth certificate where available)
  - Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
  - 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 6 years afterwards as part of their personnel file. Where right to work is stored separately to the personnel file we will store for 2 years.
  - 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, including overseas checks for each and every country in which the applicant has lived or worked since the age of 18 years subject to a minimum period of three months' residence. Further, and regardless of recorded periods of residence, it is mandatory to obtain a criminal record check from the applicant's country of nationality.
  - From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Reach Academy must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available: criminal records checks for overseas applicants – Home Office guidance can be found on [GOV.UK](https://www.gov.uk); and for teaching positions; obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC. Where available, such evidence can be considered together with information obtained through other pre-appointment checks to help assess their suitability.
- Where this information is not available schools and colleges should seek alternative methods of checking suitability and or undertake a risk assessment that supports informed decision making on whether to proceed with the appointment. Although sanctions and restrictions imposed by another regulating authority do not prevent a person from taking up teaching positions in England, schools and colleges should consider the circumstances that led to the restriction or sanction being imposed when considering a candidate's suitability for employment.
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state
  - We will ensure that appropriate checks are carried out to ensure that individuals to whom the legislation applies) are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006
  - We will ask for written information about previous employment history and check that information is not contradictory or incomplete.
  - We will seek references on all short-listed candidates before the interview as far as is reasonably practicable. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

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

## 26.8.2 Disclosing previous convictions and Enhanced DBS checks

There are currently no statutory requirements for schools to renew employee's DBS, however at Reach Academy we think it is important to check and renew DBS every 3 years as a minimum requirement. We think this is best practice as we believe that DBS checks in education are a vital safeguarding tool that helps to ensure the safety and wellbeing of children and young people.

We will renew a DBS check earlier than the stated 3 years if there has been a break in service of more than three months or the school has concerns about a member of staff's suitability to work with children.

We will record all information on the checks carried out on Staff Safe. Copies of these checks, where appropriate, will be held in individuals' personnel files or securely held on Staff Safe. We follow requirements and best practice in retaining copies of these checks.

Important legal changes came into force on the 28th November 2020 to take into account a judgement by the Supreme Court:

*"The amendments to the Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975 (2013 and 2020) provides that when applying for certain jobs and activities, certain convictions and cautions are considered 'protected'. This means that they do not need to be disclosed to employers, and if they are disclosed, employers cannot take them into account. Guidance about whether a conviction or caution should be disclosed can be found on the Ministry of Justice website."*

This means that:

- Cautions given to under 18s are no longer legally disclosed;
- The multiple conviction rule has been removed so that each offence should be considered individually
- Applicants must be told how to get independent, confidential advice on which cautions or convictions they must disclose and be given time to obtain advice. Enhanced DBS certificates will always include the following records no matter when they were received:
  - All convictions for specified offences
  - Adult cautions for specified offences
  - All convictions that resulted in a custodial sentence

In line with these changes we have amended our recruitment procedure from January 2020:

After the shortlisting stage, before the interview, candidates will be given the opportunity to disclose their criminal record. Candidates will be directed to seek advice and guidance on disclosing a criminal record from [Nacro](#) and [Unlock](#).

All cases will be examined on an individual basis, taking the following into consideration:

- Whether the conviction is relevant to the position applied for.
- The seriousness of any offence revealed
- The age of the applicant at the time of the offence(s).
- The length of time since the offence(s) occurred.

- Whether the applicant has a pattern of offending behaviour.
- The circumstances surrounding the offence(s), and the explanation(s) offered by the person concerned.
- Whether the applicant's circumstances have changed since the offending behaviour.

## 26.8.2 Existing staff

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## 26.9 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. We will ensure any allegations regarding Agency or third-party staff are dealt with correctly by taking the lead on all investigations and contacting the LADO.

## 26.10 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 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.

Where there are contractors who have lived or worked since the age of 18 years subject to a minimum period of three months' residence and their contracting company has not sought overseas checks, Reach Academy will conduct a risk assessment to assess the suitability of their work and make appropriate and reasonable adjustments to their work. For example, If Reach Academy hired a contractor with an Enhanced DBS who has spent time living abroad for more than 3 months but the company had not completed overseas checks then we would risk assess the situation. It is likely the outcome would suggest that the contractor would work at a time where the school day had ended.

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.

### 26.11 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 Childcare Disqualification (Regulations) and Childcare Act 2006.

### 26.12 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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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

### 26.13 Trustees and governors

All trustees and 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.

The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

All trustees, proprietors and local governors will have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity and Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.



## 26.14 Visitors

All visitors will be required to verify their identity to the satisfaction of staff. If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

When a visitor comes to the school (not including children's relatives or attending a family event eg. sports day) we must see a form of photo ID and they must sign in on our visit-ed system. If they have a DBS certificate (or their employer confirms the DBS check) then they receive a green lanyard which means they may be in the school unescorted. If we only see a form of photo ID then they receive a red lanyard and must be escorted round the building. All visitors will receive a Safeguarding leaflet with the key information on what they need to do if they have a concern.

## 26.15 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.

## 26.16 Pupils staying with host families

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.

## 26.17 Alternative provision settings

When 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.

## 27. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Sexual Harassment and Violence
- Complaints
- Health and safety
- Attendance
- Relationship, Sexual health and Education
- First aid
- Staff Handbook and Code of Conduct

Our Health & Safety policy, set out in a separate document, reflects the consideration we give to the protection of our children both within the Academy environment and when away from the Academy when undertaking trips and visits.

Our policy on physical intervention by staff is set out in a separate policy and acknowledges that staff must only ever use physical intervention as a last resort and that at all times it must be the minimal force necessary to prevent injury to another person. We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection procedures. Any physical interventions will be recorded on CPOMS, our confidential management information system.

Our policy on bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures.

## 28. Appendices

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

## Appendix 1: Types of abuse

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

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

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

Emotional abuse may involve:

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

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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.

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.

## Appendix 2: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff, including a supply teacher or volunteer, has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

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

Suspension 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 it 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 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 academy trust

### 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
- **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 headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

Immediately 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

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 and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

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

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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 governing board 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 staff

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

We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome

The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, 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 local authority designated officer 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

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

## 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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a child, or if they think the person otherwise poses a risk of harm to a child, they must make a referral to the DBS.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer 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 or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

## Confidentiality

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 local authority's designated officer, 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. Such records will include:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

## References

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## Learning lessons

After any cases where the allegations are *substantiated*, we 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

### Appendix 3: Specific safeguarding issues

#### Children missing from education

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

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

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

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

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

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

#### Child criminal exploitation

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



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

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be 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.

## Child sexual exploitation

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

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

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

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

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

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

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

## 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.

Secondary schools add: Older children may also experience domestic abuse and/or violence in their own personal relationships.

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

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the designated safeguarding lead before the child or children arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).

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

## Homelessness

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

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

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

## 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 problem
  - 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 issue
- 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 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 one 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 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

## 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.

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.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

In Hounslow, a Prevent priority area, the Prevent leads can provide support:

Joan Conlon Prevent Lead

Email: joan.conlon-GCSX@hounslow.gcsx.gov.uk

Mobile 07817 079190

Najeeb Ahmed Home Office Approved Intervention Provider and Prevent Coordinator Email:

najeeb.ahmed-GCSX@hounslow.gcsx.gov.uk

Mobile 07890 540433

You can also contact your local police force or dial 101 (the non-emergency number). They can talk to you in confidence about your concerns and help you gain access to support and advice. The Department for Education has dedicated a telephone helpline (020 7340 7264) to enable staff and governors to raise concerns relating to extremism directly. Concerns can also be raised by email to counter.extremism@education.gsi.gov.uk. Please note that the helpline is not intended for use in emergency situations, such as a child being at immediate risk of harm or a security incident, in which case the normal emergency procedures should be followed.

## Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Contact the parents
- Contact the emergency contact on Schoolbase
- A member of staff will stay with the child until they are collected

## Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

- Contact and inform parents
- SLT will try and look for the child
- The DSL/SLT will inform the police on 101 if we can not immediately find the child
- All incidences of missing pupils will be reported on CPOMS
- We will follow up with the child/family if there is anything we can do in the future to prevent this, including a potential risk assessment.

## Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence. Whilst most privately fostered children are appropriately

supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement.

Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility. Reach staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

#### Appendix 4: RAF Procedure for referral to Social Care

In the event of any safeguarding concern where the child is in immediate risk of harm and danger the first step is to find one of the members of the safeguarding team: Georgia Strong, Jerome Barlow and Alice Whitehouse. In the event of all three absences the Executive Headteacher, Rebecca Cramer or Secondary Headteacher, Beck Owen or Primary Headteacher, Matilda Browne should be contacted for all concerns. If a member of staff has a concern and it is out of hours then staff members need to make contact with the Executive Headteacher, Rebecca Cramer or Secondary Headteacher, Beck Owen or Primary Headteacher, Matilda Browne.

All safeguarding concerns should be promptly recorded on CPOMS after speaking to the member of the safeguarding team.

Deciding whether to refer to social care:

Georgia Strong, Jerome Barlow and Alice Whitehouse will make referrals to social care. However, it is important to realise that any member of staff can make a referral if they consider that there is any chance a child could come to significant harm. If a member of staff is not confident in their next steps, then they can speak to the safeguarding team, or speak anonymously to the NSPCC on 0800 800 5000 and they will help the member of staff to decide. The best outcome for a child needing to be referred will be if it happens inside social care hours, so every effort should be made to refer before 3pm.

What information will I need to give when making a referral?

You should have the following information ready:

- Your name
- Your job title
- School address and telephone number
- Child's name
- Child's date of birth
- Parents' names
- Parents' dates of birth, where possible
- Name of any other implicated adults
- Details of child's siblings or any other children who may be at risk
- Exact details of concern – any of the following:
  - Time of disclosure
  - Exact words of disclosure

- Precise description of any injuries you have seen

### Contacting the child's family

You will have to use common sense in deciding your approach to parents/carers. If there is time, you can ask the advice of social care. Generally, good practice is for you to speak to the child's parents/carers to tell them that you have made a referral to social care and to explain why. This is to help maintain good, trusting relationships between all parties. You could say, for example, "I know that you want the very best for your child and I know that you will understand that it is my duty to take care of your child too. Your child let me know today that... and so I am letting social care know so that they can help you and your family. It is likely that they will speak to you later today. Do you have any questions?"

Sometimes it will be appropriate for you to speak to the child's family before making a referral because the child may not be able to give enough information on their own. Sometimes you will want to avoid letting the child go home with their parent/carer. Sometimes you will need to address this directly with the adult. Occasionally you may need to call 999 if the child is taken away by the parent/carer.

If a child is at risk of immediate significant harm or there is a risk that adults may change stories or obstruct social care and it is early enough in the day, then it is most appropriate to let social care deal with the incident.

### Appendix 5: Children missing from education

A child going missing from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or radicalisation.

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

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

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

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

