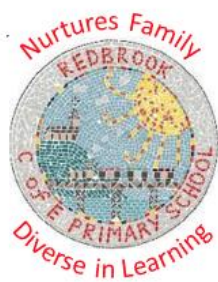


# Wye Forest Federation

Redbrook Church of England Primary School  
St Briavels Parochial Church of England Primary School



Name of Policy: **Child Protection Policy**

Date of review:	Sept 22
Date of next review:	Sept 23

## **Wye Forest Federation Child Protection Policy September 2022**

### **C O N T E N T S**

<b>1</b>	<b>Introduction</b>
<b>2</b>	<b>Statutory Framework</b>
<b>3</b>	<b>The DSL (DSL) and Deputy DSL (DDSL)</b>
<b>4</b>	<b>The management of safeguarding (Governing Board)</b>
<b>5</b>	<b>When to be concerned</b>
<b>6</b>	<b>Dealing with a Disclosure</b>
<b>7</b>	<b>Record Keeping</b>
<b>8</b>	<b>Confidentiality</b>
<b>9</b>	<b>School Procedures</b>
<b>10</b>	<b>Communication with parents</b>
<b>11</b>	<b>Complaints and concerns about federation safeguarding policies</b>
<b>12</b>	<b>Allegations of abuse made against adults who work with children and young people.</b>
<b>Appendix 1</b>	<b>Link to Keeping Children Safe in Education (KCSIE) DfE, 2022</b> <ul style="list-style-type: none"><li>• <b>Part One: Information for all school and college staff</b></li><li>• <b>Annex B: Further information</b></li><li>• <b>Updates from KCSiE (DfE, 2022)</b></li></ul>

<b>Appendix 2</b>	<b>Declaration for staff: Child Protection Policy and KCSiE (DfE 2022)</b>
<b>Appendix 3</b>	<b>Actions where there are concerns about a child</b>
<b>Appendix 4</b>	<b>Operation Encompass – Information sharing from Police regarding Domestic Abuse notifications and Children Missing from Education</b>
<b>Appendix 5</b>	<b>Ofsted school Inspection Handbook for September 2022</b>
<b>Appendix 6</b>	<b>Online Safety guidance</b>
<b>Appendix 7</b>	<b>GDPR, data protection and Freedom of Information</b>

## 1. INTRODUCTION

The Governing Board of the Wye Forest Federation recognises its responsibility, under section 175 of the Education Act 2002, to safeguard and promote the welfare of children; and to work together with other agencies to ensure there are adequate arrangements within our PRU to identify, assess and support those children who may be suffering harm. This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004; the Education Act 2002 and in line with statutory guidance: 'Working together to safeguard children' (DfE 2018) and 'Keeping children safe in education' (DfE 2022). This policy also takes on board procedures and guidance set out by Gloucestershire Safeguarding Children Executive. (<https://www.gloucestershire.gov.uk/gscp/working-together-arrangements/>)

Safeguarding is defined as: *protecting children from maltreatment, preventing impairment of children's health or development, ensuring that children are growing up in circumstances consistent with the provision of safe and effective care and taking action to enable all children to have the best outcomes.* (**Working Together to Safeguard Children**, (DfE, 2018), p6)

This Child Protection Policy forms part of a suite of documents and policies which relate to the safeguarding responsibilities of the whole federation staff and volunteers. All staff should be aware of systems within the federation which support safeguarding, and these will be explained to them as part of staff induction. This will include the:

- child protection policy, which should amongst other things also include the policy and procedures to deal with child on child abuse;
- behaviour policy (which should include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- anti-bullying and hate policy;
- staff code of conduct;
- online safety policy and ICT and internet acceptable use policy;
- SEND policy
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and any deputies).
- copy of Part One Keeping children safe in education (2022) and should be signed to say it has been read and understood.
- Annex A, condensed version of Part one of KCSiE (DfE 2022). It can be provided (instead of Part one) to those staff who do not directly work with children.

### **Purpose of a Child Protection Policy**

To inform staff, parents, volunteers and governors about the federation's responsibilities for safeguarding children. To enable everyone to have a clear understanding of how these responsibilities should be carried out.

## **GSCB**

The Wye Forest Federation follows the procedures established by the Gloucestershire Safeguarding Children Board (GSCB)

<https://www.gloucestershire.gov.uk/gscp/> GSCB also provide regular email alerts and training to The Wye Forest Federation staff. All staff are encouraged to visit this live, regularly updated website which guides and informs schools.

## **School Staff & Volunteers**

All federation staff, including supply staff, volunteers and contract workers have a responsibility to provide a safe environment in which children can learn.

Federation staff and volunteers are particularly well placed to observe outward signs of abuse, changes in behaviour and failure to develop because they have daily contact with children.

All federation staff will receive appropriate safeguarding children training, including online safety (which is updated regularly –GSCB advises every three years), so that they are knowledgeable and aware of their role in the early recognition of the indicators of abuse or neglect and of the appropriate procedures to follow. In addition, all staff members should receive safeguarding and child protection updates (for example, via email, e-bulletins and staff meetings), as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

Supply staff, contractors and volunteers will be made aware of the safeguarding policies and procedures by the DSL, including The Child Protection Policy and Staff Behaviour Policy (code of conduct)

## **Mission Statement**

At the Wye Forest Federation we create an environment in which **all** children and young people feel safe, secure, valued and respected and where they can learn and fully develop in order to flourish now and in the future.

We establish and maintain an ethos and culture where children feel safe, are encouraged to talk, and are listened and responded to when they have a worry or concern. We ensure that children know that there are adults in the school whom they can approach if they are worried.

The federation also establishes and maintains an ethos and culture where school staff and volunteers feel safe, are encouraged to talk and are listened and responded to

when they have concerns about the safety and well-being of a child.

We ensure that children, who have additional/unmet needs are supported appropriately. This could include referrals to Early Help Services to access specialist services if they are a child in need or have been / are at risk of being abused and neglected.

Through our RSHE provision and the use of the 1 Decision program of learning, we teach children about safeguarding: developing the skills they need to recognise and stay safe from abuse or from other areas of risk including online safety, as part of providing our broad and balanced curriculum – KCSiE (DfE 2022), pg. 33-35. We also contribute to the Spiritual, Moral, Social and Cultural (SMSC) development of children as well as other key aspects of a young person's well-being (being healthy, staying safe, enjoying and achieving, making a positive contribution and achieving economic well-being).

Our staff members working with children are advised to maintain an attitude of 'it could happen here' and 'it could be happening to this child', where safeguarding is concerned. When concerned about the welfare of a child, staff members will always act in the best interests of the child.

We ensure that all staff know the procedures for reporting a concern or making a child protection referral and that staff are well equipped to spot signs of abuse or a child in need of early help for a variety of reasons.

We ensure that we have suitable staff working within our schools by adhering stringently to safer recruitment processes and ensuring any unsuitable behaviour is reported and managed quickly using the Allegations Management procedures.

At the Wye Forest Federation we ensure that within there is an understanding that **safeguarding is the responsibility of EVERYONE. If at any point there is immediate risk of serious harm to a child a referral must be made to the MASH immediately or dial 999. Anybody can make a referral.**

#### **Implementation, Monitoring and Review of the Child Protection Policy**

The policy will be reviewed at least annually by the governing body. It will be implemented through the federation's induction and training programme, and as part of day to day practice. Compliance with the policy will be monitored by the DSL and through staff performance measures.

## 2. STATUTORY FRAMEWORK

In order to safeguard and promote the welfare of children, the federation will act in accordance with the following legislation and guidance:

- The Children Act 1989
- The Children Act 2004
- Children and Social Work Act 2017
- Education Act 2002 (Section 175/157)  
*Outlines that Local Authorities and School Governing Bodies have a responsibility to “ensure that their functions relating to the conduct of school are exercised with a view to safeguarding and promoting the welfare of children who are its pupils”.*
- Gloucestershire Safeguarding Children Procedures
- Keeping Children Safe in Education (DfE, September 2022)
- Working Together to Safeguard Children (DfE 2018)
- The Education (Pupil Information) (England) Regulations 2005
- Sexual Offences Act (2003)
- Section 26, The Counter Terrorism and Security Act 2015 (PREVENT duty)
- Female Genital Mutilation Act 2003 (Section 74, Serious Crime Act 2015)
- Anti-social Behaviour, Crime and Policing Act 2014 (makes it a criminal offence to force someone to marry. Includes taking someone overseas to force them to marry (whether or not the forced marriage takes place).
- Serious Violence Strategy 2018
- Sexual violence and sexual harassment between children in schools and colleges (DfE 2017)

## 3. THE DESIGNATED SAFEGUARDING LEAD

The Governing Board will ensure an appropriate **senior member** of staff, from the school **leadership team**, is appointed to the role of DSL.

During term time the DSL and/ or a Deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concern., In the event of all Safeguarding leads being off one site then the Safeguarding lead on the other site will be phoned. For out of hours/out of term activities, Natalie Frey can be contacted via her mobile phone (number shared privately with staff) or via email [head@wff.gloucs.sch.uk](mailto:head@wff.gloucs.sch.uk).

The DSL for Child Protection in this Federation is: **Natalie Frey**

There should be a Deputy DSL (DDSL) in the absence of the lead DSL.

The Deputy DSLs for Child Protection in this federation are: **Amy Davis, Felicity Kear, Isabel Woods, Julia Price**

The Designated Teacher for Looked After Children is: **Amy Davis**

**The broad areas of responsibility for the DSL are:**

- Managing Multi-Agency Referral Forms (MARFs) and cases
- Contacting the MASH when advice is needed regarding child protection concerns which possibly meet the threshold for statutory intervention
- Completing MARFs for all cases of suspected abuse or neglect where there is a risk of significant harm to the child/young person, Police where a crime may have been committed and to the Channel programme where there is a radicalisation concern
- Liaise with the Executive Headteacher to inform her of issues, especially ongoing enquiries under Section 47 of the Children Act 1989 and police investigations
- Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a Child Protection Referral by liaising with relevant agencies
- Support staff who make Child Protection Referrals and other service referrals
- Share information with appropriate staff in relation to a child in care (CIC) legal status (whether they are looked after under voluntary arrangements with consent of parents or on an Interim Care Order or Care Order) and contact arrangements with birth parents or those with parental responsibility.
- Ensure they have details of the CIC's social worker and the name of the virtual school Head Teacher in the authority that looks after the child or those currently working with a to social worker.

**Training KCSiE (DfE, 2022)**

The DSL and DDSLs should undergo formal training every two years. The DSL and DDSLs should also undertake Prevent awareness training every 3 years. In addition to this training, their knowledge and skills should be refreshed (for example via GSCB e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:



- 1) Understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- 2) Have a working knowledge of how Gloucestershire conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- 3) Understand the importance of the role the designated safeguarding lead has in providing information and support to children social care in order to safeguard and promote the welfare of children
- 4) Understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- 5) Are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers
- 6) Understand the importance of information sharing, both within the federation, and with the safeguarding partners, other agencies, organisations and practitioners  
(Full details in Chapter one of **Working Together to Safeguard Children**)
- 7) Understand and support the federation with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- 8) Are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school
- 9) Can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- 10) Obtain access to resources and attend any relevant or refresher training courses and encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the federation may put in place to protect them.

**Raising Awareness: The DSL (DDSL) should:**

- Ensure all staff including part time, contractors, volunteers and supply staff are aware of the federation's policies, that these are understood and used appropriately.
- Work with the governing board to ensure that the federation's child protection policy is reviewed annually, and the procedures and implementation are updated and reviewed regularly.

- Ensure the safeguarding and child protection policy is available publicly and that parents are aware that advice regarding early help and child protection concerns could be sought from the MASH. Referrals about suspected abuse or neglect may be made. Ensure parents are aware of the federation's statutory role regarding safeguarding of children.
- Link with Gloucestershire Safeguarding Children's Board (GSCB) to make sure staff are aware of training opportunities and the latest local policies on safeguarding.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and federation leadership staff.
- Ensure that when children leave the federation, they ensure the file for safeguarding and any child protection information is sent to any new school/college as soon as possible but transferred securely and separately from the main pupil file. The file should not be sent until the child is physically attending the new school.
- Obtain proof that the new school/education setting has received the safeguarding file for any child transferring and then destroy any information held on the child unless the case is currently open and in line with data protection guidelines.
- Consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

#### 4. THE MANAGEMENT OF SAFEGUARDING

The Wye Forest Federation Governing Board will ensure that they comply with their duties under legislation. They will also have regard to this guidance to ensure that the policies, procedures and training are always effective and comply with the law.

The responsibility of the governing board includes:

- ensure there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children's welfare e.g.

-Child protection policy in place

-Staff code of conduct in place

-Part one of KCSiE (DfE, 2022) and Annex B KCSiE (DfE, 2022) on specific safeguarding issues is read by all staff annually

-Information regarding the role and identity of the designated safeguarding lead (and any deputies), **is provided to all staff on induction**

- Governing bodies should have a senior board level (or equivalent) lead to take **leadership** responsibility for their schools safeguarding arrangements.

The nominated governor for child protection is: **Helen Blanch**

The nominated Chair of governors for child protection is: **Mike Haines**

The nominated Vice Chair of governors for child protection is: **Susan Young**

- Headteachers and principals should ensure that the above policies and procedures, adopted by governing bodies and proprietors, and particularly concerning referrals of cases of suspected abuse and neglect, are followed by all staff.
- Ensure that the federation contributes to multi-agency working in line with statutory guidance **Working Together to Safeguard Children (DfE,2018)**.
- New safeguarding partners and child death review partner arrangements are in place
- Should understand the local criteria for action and the local protocol for assessment and ensure they are reflected in their own policies and procedures. They should also be prepared to supply information as requested by the three safeguarding partners
- The federation should work with social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.
- Ensuring arrangements are in place that set out clearly the and principles for sharing information within the school or college and with the three safeguarding partners, other organisations, agencies and practitioners as required.
- Ensure child protection files are transferred to the new school or college as soon as possible, ensuring secure transit, and confirmation of receipt should be obtained
- Ensure that all staff undergo child protection training (including online safety) at induction. The training should be regularly updated. Induction and training should be in line with advice from the local three safeguarding partners (GSCB).
- All staff should receive regular safeguarding and child protection updates (for example, via email, GSCB e-bulletins, staff meetings) as required, and at least annually
- Opportunity should therefore be provided for staff to contribute to and shape safeguarding arrangements and child protection policy.

- Ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum. Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) Mandatory since September 2020.
- Governing bodies should prevent people who pose a risk of harm from working with children by adhering to statutory responsibilities to check staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required and ensuring volunteers are appropriately supervised.
- Ensure the federation has written recruitment and selection policies and procedures in place and at least one of the persons who conducts an interview has completed safer recruitment training
- Should ensure there are procedures in place (as described in part 4 of KCSiE) to manage concerns and allegations against staff including volunteers and supply staff
- There must be procedures in place to make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned. (refer to *Type of DBS checks* in KCSiE (DfE 2022) pg. 57
- All staff should be clear about the federation's policy and procedures with regard to child on child abuse.
- Where there is a safeguarding concern, ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback. Ultimately, all systems and processes should operate with the best interests of the child at heart.
- Ensuring that all of the DSLs, including deputies, should undergo formal child protection training every two years, in line with KCSiE and GSCB procedures, and receive regular, at least annual, safeguarding updates via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments, for example.
- Prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Ensuring appropriate filters and appropriate monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material. Additional information to support governing bodies is provided in Part 2 of KCSiE (DfE 2022).

## **5. WHEN TO BE CONCERNED**

Knowing what to look for is vital for the early identification of abuse and neglect. All staff will be aware of the Indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection.

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology maybe used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

<b>Physical abuse</b>	
A form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child.	
<b>Indicators in a child/ young person</b>	
Bruises – shape, grouping, site, repeat or multiple	Withdrawal from physical contact
Bite-marks – site and size Burns and Scalds – shape, definition, size, depth, scars	Aggression towards others, emotional and behaviour problems
Improbable, conflicting explanations for injuries or unexplained injuries	Frequently absent from school
Untreated injuries	Admission of punishment which appears excessive
Injuries on parts of body where accidental injury is unlikely	Fractures
Repeated or multiple injuries	Fabricated or induced illness

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

Self-harm	Over-reaction to mistakes / Inappropriate emotional responses
Chronic running away	Abnormal or indiscriminate attachment
Drug/solvent abuse	Low self-esteem
Compulsive stealing	Extremes of passivity or aggression
Makes a disclosure	Social isolation – withdrawn, a ‘loner’ Frozen watchfulness particularly pre school
Developmental delay	Depression
Neurotic behaviour (e.g. rocking, hair twisting, thumb sucking)	Desperate attention-seeking behaviour

### **Neglect**

The persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child’s basic emotional needs.

#### **Indicators in a child/ young person**

Failure to thrive - underweight, small stature	Low self-esteem
Dirty and unkempt condition	Inadequate social skills and poor socialisation
Inadequately clothed	Frequent lateness or non-attendance at school
Dry sparse hair	Abnormal voracious appetite at school or nursery
Untreated medical problems	Self-harming behaviour
Red/purple mottled skin, particularly on the hands and feet, seen in the winter due to cold	Constant tiredness
Swollen limbs with sores that are slow to heal, usually associated with cold injury	Disturbed peer relationships

### **Sexual abuse**

Involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual

activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of their school or colleges policy and procedures for dealing with it.	
<b>Indicators in a child/ young person</b>	
Self-harm - eating disorders, self-mutilation and suicide attempts	Poor self-image, self-harm, self-hatred
Running away from home	Inappropriate sexualised conduct
Reluctant to undress for PE	Withdrawal, isolation or excessive worrying
Pregnancy	Sexual knowledge or behaviour inappropriate to age/stage of development, or that is unusually explicit
Inexplicable changes in behaviour, such as becoming aggressive or withdrawn	Poor attention / concentration (world of their own)
Pain, bleeding, bruising or itching in genital and /or anal area	Sudden changes in schoolwork habits, become truant
Sexually exploited or indiscriminate choice of sexual partners	

If staff have any concerns about a child's welfare, they should act on them immediately. If staff have a concern, they should follow this policy and speak to the DSL/DDSL. The DSL/DDSL are most likely to have a complete safeguarding picture and be the most appropriate person to advise on the response to a safeguarding concern.

**Any staff member should be able to make a Child Protection Contact Referral to Children's Services if necessary.**

All staff should be aware of the process for making Child Protection Referrals to Children's Services for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm - from abuse or neglect) that may follow a Referral, along with the role they might be expected to play in such assessments.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment and allocation of appropriate service provision.

**Options will then include:**

- Managing any support for the child internally via the federation's own pastoral support processes.
- Completing a Families First Assessment or making a request for early help support.

- A MARF (Multi Agency Referral form) for statutory services, for example as the child might be in need of services, or suffering / likely to suffer significant harm from abuse or neglect.

### **Extra Familial Harm (formerly contextual Safeguarding)**

Safeguarding incidents and/or behaviours can be associated with factors outside the federation and/or can occur between children outside the federation. All staff, but especially the DSLs and their Deputies should be considering the context within which such incidents and/or behaviours occur. This is known as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

### **A child centred and coordinated approach to safeguarding**

Safeguarding and promoting the welfare of children is **everyone's responsibility**. In order to fulfil this responsibility effectively, each professional should make sure their approach is **child centred**. This means that they should consider, at all times, what is in the best interests of the child.

Schools and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the **best interests** of the child at all times.

### **Children who may require early help**

Within Gloucestershire the Early Help Partnership is co-ordinated by Families First Plus but all organisations working with children and young people should view themselves as part of the Early Help Partnership. A directory of early help services is available at <https://www.gloucestershire.gov.uk/health-and-social-care/children-young-people-and-families/early-help-and-targeted-support/targeted-support/families-first/> which will help practitioners and families find information and support to prevent escalation of needs and crisis.

All staff will be aware of the **early help process**, and understand their role in identifying emerging problems, sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help at the right time to address risks and prevent issues escalating. This also includes staff monitoring the situation and feeding back to the DSL any ongoing/escalation of concerns so that consideration can be given to a Child Protection Referral to Children's Services if the child's situation doesn't appear to be improving.

If early help is appropriate, the DSL or a Deputy will generally lead on liaising with other agencies and setting up a Families First Assessment as appropriate.

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

- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;



- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

Federation staff members will be aware of the main categories of maltreatment: **physical abuse, emotional abuse, sexual abuse and neglect** as well as being aware of the indicators of maltreatment and **specific safeguarding issues** so that they are able to identify cases of children who may be in need of help or protection.

#### **Children with special educational needs and disabilities:**

Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- ❖ Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration.
- ❖ Assumptions that children with SEN and disabilities can be disproportionately impacted by things like bullying- without outwardly showing any signs.
- ❖ Communication barriers and difficulties.
- ❖ Reluctance to challenge carers, (professionals may over empathise with carers because of the perceived stress of caring for a disabled child).
- ❖ Disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased.
- ❖ A disabled child's understanding of abuse.
- ❖ Lack of choice/ participation.
- ❖ Isolation.

### **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

### **Looked-after and previously looked-after children**

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

We have appointed a designated teacher, Amy Wilson – Executive Deputy Headteacher, who 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

### **Child on child abuse**

**All** staff will be aware that safeguarding issues can manifest themselves via child on child abuse. This is most likely to include, but may not be limited to:

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Abuse in intimate relationships between children.
- Sexual violence, such as rape, assault by penetration and sexual assault.

- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse.
- Up-skirting, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Sexting (also known as sharing nudes or semi-nudes).
- Initiation/hazing type violence and rituals.

All staff will be aware that abuse is abuse and child on child abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Furthermore, they will recognise the gendered nature of child on child abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators), but that all child on child abuse is unacceptable and will be taken seriously.

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

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

### **Procedures for dealing with allegations of child-on-child abuse**

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

- › Staff 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. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- › The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- › Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- › There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

In order to minimise the risk of child on child abuse the Wye Forest Federation:

- Provides a developmentally appropriate PSHE and RSE curriculum through our use of the 1 decisions programme which develops pupils' understanding of acceptable behaviour and keeping themselves safe.
- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Has systems in place for any student to raise concerns with staff, knowing that they will be listened to, believed and valued. (see reporting systems for our pupils)
- Ensures victims, perpetrators and any other child affected by child on child abuse will be supported – see anti-bullying and hate incidents policy
- Develops robust risk assessments where appropriate (e.g. Using the Risk Assessment Management Plan and Safety and Support Plan tools).
- Have relevant policies in place (e.g. behaviour policy).
- Recognises that if there are no reported cases of child on child abuse, such abuse may still be taking place and is simply not being reported.

Staff should also refer to Part five of KCSiE (DfE 2022) – '**Child on child sexual violence and sexual harassment**':

<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>

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

### **Your responsibilities when responding to an incident**

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

You must **not**:

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

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

### **Initial review meeting**

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

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

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

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

- › What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the images or videos is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

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

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

### **Referring to the police**

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

### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in this policy also apply to recording these incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- › What it is
- › How it is most likely to be encountered
- › The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- › Issues of legality
- › The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

- › Specific requests or pressure to provide (or forward) such images
- › The receipt of such images

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

### **Serious violence**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime.

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts/new possessions

Also refer to <https://www.gloucestershire.gov.uk/gscp/safeguarding-resource-library/child-exploitation-and-missing-children/>

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

Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online. More information include definitions and indicators are included in Annex B KCSiE DfE 2022.

### **Mental Health**

All staff should 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 appropriate 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.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by following the procedures in this policy and speaking to the school's DSL.

### **Prevent: Safeguarding Children and Young People from Radicalisation**

Children can be vulnerable to extreme ideologies and radicalisation. Similar to protecting children from other forms of harm and abuse, protecting children from radicalisation must be part of all schools safeguarding approaches.

All schools and colleges are subject to the Prevent Duty under Section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions to have "due regard to the need to prevent people from being drawn into terrorism." Pg 133 KCSiE (DfE 2022).

There are signs and vulnerability factors that may indicate a child is susceptible to radicalisation or is in the process of being radicalised. It is possible to protect vulnerable people from extremist thinking and intervene to safeguard those at risk of radicalisation. Staff must be alert to changes in children's behaviour, which could indicate that they may be in need of Prevent support. They must act proportionately to the concern using the Prevent 'notice, check, share' approach, which may lead to the DSL making a Prevent referral.

Local Gloucestershire County Council guidance on Prevent:

<https://www.gloucestershire.gov.uk/gscp/safeguarding-resource-library/radicalisation-and-extremism/>

outlines the specific duties in Gloucestershire. This guidance also features advice on making a Prevent referral.

### **Domestic Abuse**

Domestic abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. See Appendix 4 for information regarding Operation Encompass.

## **6. DEALING WITH A DISCLOSURE**

### **Reporting systems for our pupils**



Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- › Put systems in place for pupils to confidently report abuse, including worry boxes in every class
- › Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils through our PSHE teaching
- › Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Pupils often form close relationships with the staff they come into contact with daily or with staff who have previously taught them. These are trusted adults for our children and they are always encouraged to speak to a trusted adult.

Where they feel uncomfortable speaking to someone, there is a worry box available for children in each class to share their worry/ disclosure with us. Upon reading a disclosure in a worry box, staff (a teacher or teaching assistant) will then speak to the child privately and offer them support.

### **Responding to a disclosure**

If a child confides in a member of staff/volunteer and requests that the information is kept secret, it is important that the member of staff/volunteer tell the child in a manner appropriate to the child's age/stage of development that they cannot promise complete confidentiality – instead they must explain that they may need to pass information to other professionals to help keep the child or other children safe.

If a child discloses that he or she has been abused in some way, the member of staff/volunteer should:

- Listen to what is being said without displaying shock or disbelief
- Accept what is being said
- Allow the child to talk freely
- Reassure the child, but not make promises which might not be possible to keep
- Never promise a child that they will not tell anyone - as this may ultimately not be in the best interests of the child.
- Reassure him or her that what has happened is not his or her fault
- Stress that it was the right thing to tell

- Listen, only asking questions when necessary to clarify what is being said.
- Not criticise the alleged perpetrator
- Explain what has to be done next and who has to be told
- Make a written record (see Record Keeping)
- Pass the information to the DSL without delay (if a DSL or Deputy is not available, staff must inform a senior member of staff or complete a MARF if this disclosure indicates that the child may be at risk of immediate harm and/or have been suffered significant harm to ensure reporting to Police and/or Children's Services where necessary is not delayed)

### **Third Party Disclosures**

It's everyone's responsibility to report concerns related to children and make referrals to Children Services and the Police if suspected that a child has been abused or is at risk of abuse.

Therefore, when safeguarding concerns are shared to the DSL in a school by a parent or member of the public, it is important to note that there is equal responsibility by the complainant to report the matter also directly rather than assume the responsibility is that of the school. If unsure of how to do this speak to the DSL / head teacher and they will advise accordingly.

### **Support**

Dealing with a disclosure from a child, and safeguarding issues can be stressful. The member of staff/volunteer should, therefore, consider seeking support for him/herself and discuss this with the DSL.

**If a federation staff member receives a disclosure about potential harm caused by another staff member, they should see section 11 of this policy– *Allegations involving school staff/volunteers*.**

## **7. RECORD KEEPING**

All practitioners should be confident of the processing conditions under the Data Protection Act 2018 and the GDPR which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal, and should be treated as 'special category personal data'.

All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing. If in doubt about recording requirements staff should discuss with the DSL.

- Record as soon as possible after the conversation. Use the Child Protection Recording system **CPOMS**.

- Ensure the date, time, place is recorded, and any noticeable non-verbal behaviour and the words used by the child.
- Use the body map on CPOMS to indicate the position of any injuries and a clear description of the injury.
- Record statements and observations rather than interpretations or assumptions.
- Do not destroy the original records in case they are needed by a court.
- All records need to be given to the DSL promptly. No copies should be retained by the member of staff or volunteer.

The DSL will ensure that all safeguarding records are managed in accordance with the Education (Pupil Information) (England) Regulations 2005.

## **8. CONFIDENTIALITY**

Safeguarding children raises issues of confidentiality that must be clearly understood by all staff/volunteers in the federation.

- All staff in the federation, both teaching and non-teaching staff, have a responsibility to share relevant information about the protection of children with other professionals, particularly the investigative agencies.
- Staff/volunteers who receive information about children and their families in the course of their work should share that information only within appropriate professional contexts.

## **9. FEDERATION PROCEDURES**

**Please see Appendix 3: KCSiE (DfE 2022) pg.22**

If any member of staff is concerned about a child, he or she must inform the DSL. The DSL will decide whether the concerns should be raised to Children's Services and if deemed to have met the threshold a MARF will be completed. If a MARF to Children's Services is made the DSL will discuss the referral with the parents, unless to do so would place the child at further risk of harm.

While it is the DSL's role to make Child Protection Contact Referrals, any staff member can make a Child Protection Contact Referral to Children's Services if a child is in immediate danger or is at risk of harm (e.g. concern that a family might have plans to carry out FGM, Forced Marriage etc). In these circumstances a Child Protection Contact Referral should be made to Children's Services and/or the Police immediately. Where Child Protection

Contact Referrals are made by another member of staff, the DSL should be informed as soon as possible.

If a **teacher** (persons employed or engaged to carry out teaching work at schools and other institutions in England) , in the course of their work in the profession, discovers that an act of Female Genital Mutilation (FGM) appears to have been carried out on a girl under the age of 18 the **teacher** must report this to the police via 101. **This is a mandatory reporting duty.** KCSiE (DfE 2022) pg. 131-132:

If the allegations raised are against other children, the school will follow guidelines issued by GSCB. Please see the federation's anti-bullying policy for more details on procedures to minimise the risk of child on child abuse.

The member of staff must record information regarding the concerns on CPOMS on the same day. The recording must be a clear, precise and a factual account of any verbal disclosures and observations

Particular attention should be paid to the attendance and development of any child about whom the school has concerns, or who has been identified as being the subject of a Child Protection Plan and a written record will be kept.

If a pupil who is/or has been the subject of a child protection plan changes school, the DSL will inform the social worker responsible for the case and transfer the appropriate records to the DSL at the receiving school, in a secure manner, and separate from the child's academic file.

The DSL is responsible for making the senior leadership team aware of trends in behaviour that may affect pupil welfare. If necessary, training will be arranged.

## 10. COMMUNICATION WITH PARENTS

The Wye Forest Federation will ensure the Child Protection Policy is available publicly either via the federation website or in printed form when requested.

Parents should be informed prior to a MARF submission, unless it is considered to do so might place the child at increased risk of significant harm by:

- The behavioural response it prompts e.g. a child being subjected to abuse, maltreatment or threats / forced to remain silent if alleged abuser informed.
- Leading to an unreasonable delay.
- Leading to the risk of loss of evidential material.

(The federation may also consider not informing parent(s) where this would place a member of staff at risk).

The federation will endeavour to ensure that parents understand the responsibilities placed on the federation staff for safeguarding children.

Where reasonably possible the federation will hold more than one emergency contact number for each pupil and student. KCSiE (DfE 2022) pg. 26.

Further guidance around information sharing can be located within; **Information sharing Advice for practitioners providing safeguarding services to children, young people, parents and carers** (DfE, 2018);

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

## **11. COMPLAINTS AND CONCERNS ABOUT FEDERATION SAFEGUARDING POLICIES**

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the federation or education setting's safeguarding arrangements.

### **Complaints against staff**

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 section 11).

### **Whistle-blowing**

Please see the federation's whistle-blowing procedures within the staff code of conduct.

## **12. ALLEGATIONS OF ABUSE MADE AGAINST ADULTS WHO WORK WITH CHILDREN AND YOUNG PEOPLE**

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

The headteacher/chair of governors will then follow the procedures set out below if appropriate.

### **Section 1: allegations that may meet the harms threshold**

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

- › Behaved in a way that has harmed a child, or may have harmed a child, and/or
- › Possibly committed a criminal offence against or related to a child, and/or
- › Behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or
- › Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

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

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

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

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

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

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

- › Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- › Providing an assistant to be present when the individual has contact with children
- › Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- › Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- › Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

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

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

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

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

- › Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- › Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- › Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- › Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made



against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- › Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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 school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

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

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

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

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

### **Timescales**

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

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

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

## **Specific actions**

### **Action following a criminal investigation or prosecution**

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

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

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

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

### **Individuals returning to work after suspension**

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

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

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

If a report is:

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

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

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

### **Record-keeping**

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

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

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

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

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

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

## References

When providing employer references, we will:

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

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

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

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- › Suspicion
- › Complaint
- › Safeguarding concern or allegation from another member of staff

- › Disclosure made by a child, parent or other adult within or outside the school
- › Pre-employment vetting checks

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

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

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

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

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

- › Being overly friendly with children
- › Having favourites
- › Taking photographs of children on their mobile phone
- › Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- › Humiliating pupils

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

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

We will create this culture by:

- › Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- › Empowering staff to share any low-level concerns 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 headteacher will collect evidence where necessary by speaking:

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

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

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### **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

Where a staff member feels unable to raise an issue with their employer/through the whistleblowing procedure or feels that their genuine concerns are not being addressed, other whistleblowing channels may be open to them:

- MASH 01452 426 625
- NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### **Safer working practice**

To reduce the risk of allegations, all staff should be aware of safer working practice and should be familiar with the guidance contained in the staff code of conduct and Safer

# Keeping children safe in education

Statutory guidance for schools and  
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## APPENDIX 1: KCSiE (DfE 2022)

Part One OR Annex A: Information for all school and college staff

Annex B: Further information

**All** staff should have access and have read Part one and Annex B (which provides further information specific forms of abuse and safeguarding issues) of this statutory guidance. All Staff should also have the opportunity to seek clarity from designated staff for any content.

This is to assist staff to understand their role and discharge their responsibilities as set out in this guidance.

All staff are asked to sign to say they have read these sections (please see Appendix 2 below) and should subsequently be re-directed to these documents again should any changes occur.

**Link to KCSiE (DfE, 2022):**

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1101454/Keeping\\_children\\_safe\\_in\\_education\\_2022.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1101454/Keeping_children_safe_in_education_2022.pdf)

**Annex F KCSiE (DfE 2022):** Substantive changes from September 2022

APPENDIX 2:

DECLARATION FOR STAFF  
Child Protection Policy and KCSiE DfE 2022

**Wye Forest Federation**

Academic Year **2022-2023**

Please sign and return to **Natalie Frey** (DSL)

by **6.9.22**

I, \_\_\_\_\_ have read and am familiar with the contents of the following documents and understand my role and responsibilities as set out in these document(s).:

- (1) The Wye Forest Federation Child Protection Policy
- (2) **Part One and Annex B** of 'Keeping Children Safe in Education' DfE Guidance, 2022
- (3) The Wye Forest Federation Behaviour Policy
- (4) The Wye Forest Federation Anti-Bullying and Hate Incident Policy
- (5) The Wye Forest Federation ICT and Internet Acceptable Use Policy
- (6) The Wye Forest Federation Staff Code of Conduct

I am aware that the DSLs/DDSLs are:

.....  
.....

and I am able to discuss any concerns that I may have with them.

I know that further guidance, together with copies of the policies mentioned above, are available from the school office and the DSL

Signed \_\_\_\_\_

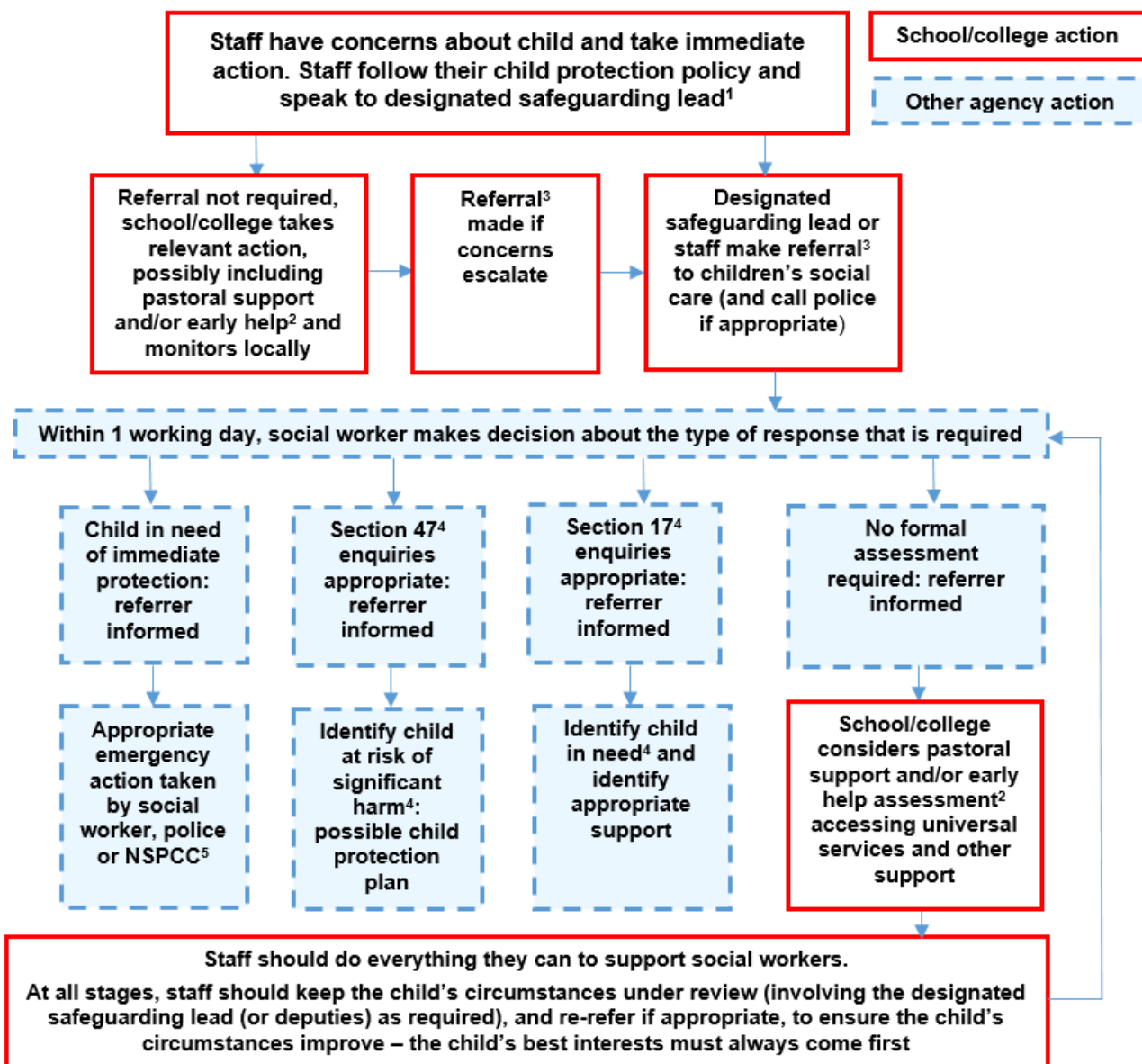
Date \_\_\_\_\_



## APPENDIX 3:

### ACTIONS WHERE THERE ARE CONCERNS ABOUT A CHILD

#### Flowchart



This advice covers incidents on school and college premises where students have potentially committed a crime. It provides guidance on what schools and colleges should bear in mind when considering contacting the police. This advice covers the following situations:

- Assault
- Criminal damage
- Cyber crime
- Drugs
- Harassment
- Sexual offences
- Theft
- Weapons

This advice aims to support schools and college to make defensible decisions when considering whether to involve the police. Further guidance can be found at;

<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>

#### APPENDIX 4:

#### OPERATION ENCOMPASS – Information sharing from Police regarding Domestic Abuse notifications (2<sup>nd</sup> December 2019)

##### **Wye Forest Federation Gloucestershire Encompass Commitment**

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

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

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

##### **Operation Encompass Safeguarding Statement:**

- Our school is part of Operation Encompass. This is a police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Abuse.
- Operation Encompass means that the police will share information about Domestic Abuse incidents with our school PRIOR to the start of the next school day when they have been called to a domestic incident.
- Our parents are fully aware that we are an Operation Encompass school.
- The Operation Encompass information is stored in line with all other confidential safeguarding and child protection information.

- The Key Adult has also led training for all school staff and Governors about Operation Encompass, the prevalence of Domestic Abuse and the impact of this abuse on children. We have also discussed how we can support our children following the Operation Encompass notification.
- We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.
- The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.
- The Key Adult has used the Operation Encompass Toolkit to ensure that all appropriate actions have been taken by the school.

**OUR KEY ADULTS ARE: Natalie Frey, Helen Blanch**  
**Key contacts at The Wye Forest Federation**

Role	Name	Contact number	Email
<b>Designated Safeguarding Lead</b>	Natalie Frey	St Bs 01594 530 428  Redbrook 01600 713 501	<a href="mailto:head@wff.gloucs.sch.uk">head@wff.gloucs.sch.uk</a>
<b>Deputy Designated Safeguarding Lead (s)</b>	Amy Davis Felicity Kear  Julia Price  Isabel Woods	St Bs 01594 530 428  Redbrook 01600 713 501	<a href="mailto:inco@wff.gloucs.sch.uk">inco@wff.gloucs.sch.uk</a>  <a href="mailto:fkear@st-briavels.gloucs.sch.uk">fkear@st-briavels.gloucs.sch.uk</a>  <a href="mailto:finance@wff.gloucs.sch.uk">finance@wff.gloucs.sch.uk</a>  <a href="mailto:iwoods@st-briavels.gloucs.sch.uk">iwoods@st-briavels.gloucs.sch.uk</a>
<b>Executive Headteacher</b>	Natalie Frey	St Bs 01594 530 428 Redbrook 01600 713 501	<a href="mailto:head@wff.gloucs.sch.uk">head@wff.gloucs.sch.uk</a>
<b>Chair of Governors</b>	Mike Haines		<a href="mailto:mhaines@wff.gloucs.sch.uk">mhaines@wff.gloucs.sch.uk</a>
<b>Vice Chair of Governors</b>	Susan Young		<a href="mailto:syoung@wff.gloucs.sch.uk">syoung@wff.gloucs.sch.uk</a>
<b>Safeguarding Governor</b>	Helen Blanch		<a href="mailto:hblanch@wff.gloucs.sch.uk">hblanch@wff.gloucs.sch.uk</a>

#### **Children missing from education in accordance with setting attendance policy**

All children, regardless of their circumstances, are entitled to an efficient, full time

education which is suitable to their age, ability, aptitude and any special educational needs they may have. Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of underachieving, being victims of harm, child sexual exploitation or radicalisation, and becoming NEET (not in education, employment or training) later in life.

Department for Education guidance makes it clear that in carrying out this duty, local authorities must have in place arrangements for joint working and information sharing with other local authorities and partner agencies. It also states that all agencies which come into contact with children must cooperate with the local authority's arrangements for identifying children thought to be missing from education.

Any child identified as Missing in Education will be reported following the GSCB Missing Protocol. <https://www.gloucestershire.gov.uk/gscp/safeguarding-resource-library/missing-protocol/>

A child legitimately removed from roll is not in most cases missing from education and all schools, including academies and independent schools are legally required to notify the local authority when they remove/plan to remove a child from their roll.

## **APPENDIX 5:**

### **Ofsted school Inspection Handbook September 2022**

This handbook is primarily a guide for inspectors on how to carry out school inspections. However, it is made available to schools and other organisations to ensure that they are informed about the processes and procedures of inspection. It seeks to balance the need for consistency in inspections with the flexibility required to respond to the individual circumstances of each school.

On publication of this Child Protection Policy, September 2022, the CPSLO Service has decided to provide the hyperlink only to the Ofsted School Inspection Handbook rather than the document in its entirety, due to the potential for updates to the content.

<https://www.gov.uk/government/publications/school-inspection-handbook-eif/school-inspection-handbook>

## APPENDIX 6:

### Online Safety and the use of Mobile Technology Guidance

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

To address this, our school aims to:

- › Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- › Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- › Set clear guidelines for the use of mobile phones for the whole school community
- › Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

#### The 4 key categories of risk

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

- › **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, radicalisation and extremism
- › **Contact** – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- › **Conduct** – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- › **Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

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

- › Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

- › Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- › Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- › Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - 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 will not take pictures or recordings of pupils on their personal phones or cameras
- › Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- › Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- › Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- › Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- › Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and ICT and Internet Acceptable Use policy which you can find on our website.

## APPENDIX 7:

### GDPR, data protection and Freedom of Information

In the event of a data breach, staff should contact Richard Morley [rmorley@schoolpro.uk](mailto:rmorley@schoolpro.uk)

Further information can be accessed at; <https://ico.org.uk/for-organisations/>