



# Highlands School

## CHILD PROTECTION AND SAFEGUARDING POLICY

SEPTEMBER 2020



## **Table of Contents**

<b>Section 1: Aims</b> .....	<b>4</b>
<b>Section 2: Legislation and statutory guidance</b> .....	<b>4</b>
<b>Section 3: Definitions</b> .....	<b>4</b>
<b>Section 4: Equality statement</b> .....	<b>5</b>
<b>Section 5: Roles and responsibilities</b> .....	<b>5</b>
<b>Section 6: Confidentiality and information sharing</b> .....	<b>7</b>
<b>Section 7: Recognising abuse and taking action</b> .....	<b>7</b>
<b>Section 8: Notifying parents/carers</b> .....	<b>14</b>
<b>Section 9: Students with special educational needs and disabilities</b> .....	<b>14</b>
<b>Section 10: Students with a social worker</b> .....	<b>15</b>
<b>Section 11: Looked-after and previously looked-after children</b> .....	<b>15</b>
<b>Section 12: Mobile phones and cameras</b> .....	<b>15</b>
<b>Section 13: Complaints and concerns about staff and school policies</b> .....	<b>15</b>
<b>Section 14: Record-keeping</b> .....	<b>16</b>
<b>Section 15: Training</b> .....	<b>16</b>
<b>Section 16: Monitoring arrangements</b> .....	<b>17</b>
<b>Section 17: Links with other policies</b> .....	<b>17</b>
<b>Appendices</b> .....	<b>19</b>
Appendix 1: Types of abuse .....	20
Appendix 2: Safer recruitment and DBS checks – policy and procedures.....	21
Appendix 3: Allegations of abuse made against staff.....	24
Appendix 4: Specific safeguarding issues.....	28
Appendix 5: Operational structure for the logging and monitoring of child protection concerns.....	34

Named personnel with designated responsibility for safeguarding

## The executive safeguarding team

**Michele Phillips** - Deputy headteacher  
Designated safeguarding lead, strategic safeguarding  
[phillipsm@highlearn.uk](mailto:phillipsm@highlearn.uk)

**Jody Larter** - Assistant headteacher  
Deputy designated safeguarding lead  
[larterj@highlearn.uk](mailto:larterj@highlearn.uk)

**Aygul Husseyin** - Assistant headteacher  
Deputy designated safeguarding lead, (with specific responsibility for sixth form)  
[husseyina@highlearn.uk](mailto:husseyina@highlearn.uk)

**Christine Jesuthasan**- Family liaison officer  
Deputy designated safeguarding lead, first point of contact for all external agencies  
[jesuthasanc@highlearn.uk](mailto:jesuthasanc@highlearn.uk)

**Yasmin Gray** - LAC admin officer  
Deputy designated safeguarding lead, LAC  
[grayy@highlearn.uk](mailto:grayy@highlearn.uk)

**Anna Michaelides** - Assistant headteacher  
Deputy designated safeguarding lead  
[michaelidesa@highlearn.uk](mailto:michaelidesa@highlearn.uk)

**To be appointed** - Deputy SENCO  
Deputy designated safeguarding lead

**Lori Charles** - School counsellor  
[charlesl@highlearn.uk](mailto:charlesl@highlearn.uk)

**Tracey Cawte-Davey** - Matron  
[matron@highlearn.uk](mailto:matron@highlearn.uk)

**Matt Miller**- Safeguarding governor/chair of governors  
[millerm@highlearn.uk](mailto:millerm@highlearn.uk)

## Safeguarding support team

### Heads of year (all DSL trained)

Year 7 - Rachel Halstead  
Year 8 - Shiv Hutchinson  
Year 9 - Vicki Berrill  
Year 10 - Nilgun Ace  
Year 11 - Vicki Murdock  
Year 12 - Jenny Theodorou  
Year 13 - Muna Sheikh

### Behaviour mentors (all DSL trained)

Year 7 - Rikki Annunziato  
Year 8 - Nathalia O’Sullivan  
Year 9 - Mike O’Doherty  
Year 10 - Maria Leahy  
Year 11- Sam Ticehurst  
Year 12 - Denise Norton  
Year 13 - Denise Norton

### Section 1: Aims

#### 1.1. The school aims to ensure that:

- 1.1.1. Appropriate action is taken in a timely manner to safeguard and promote student welfare.
- 1.1.2. All staff are aware of their statutory responsibilities with respect to safeguarding.
- 1.1.3. Staff are properly training in recognising and reporting safeguarding issues.

### Section 2: Legislation and statutory guidance

- 2.1. This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children\(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.
- 2.2. This policy is also based on the following legislation:
  - 2.2.1. Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students.
  - 2.2.2. [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.
  - 2.2.3. [The Children's Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children.
  - 2.2.4. Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
  - 2.2.5. [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
  - 2.2.6. [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
  - 2.2.7. Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children.
  - 2.2.8. [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
  - 2.2.9. 2018-21 Enfield Children's Services. Threshold Guidance. A guide for Multi Agency Partners. <https://new.enfield.gov.uk/enfieldlscb/wp-content/uploads/2018/08/ECSL3080-Students-Threshold-Guidance-2018-21.pdf>

### Section 3: Definitions

#### 3.1. Safeguarding and promoting the welfare of students means:

- 3.1.1. Protecting students from maltreatment.
- 3.1.2. Preventing impairment of students' mental and physical health or development.
- 3.1.3. Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- 3.1.4. Taking action to enable all students to have the best outcomes.

## Highlands School: Student protection and safeguarding policy

- 3.2. **Child protection** is part of this definition and refers to activities undertaken to prevent students suffering, or being likely to suffer significant harm.
- 3.3. **Abuse** is a form of maltreatment of a student, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.
- 3.4. **Neglect** is a form of abuse and is the persistent failure to meet a student's basic physical and/or psychological needs, likely to result in the serious impairment of the student's health or development. Appendix 1 defines neglect in more detail.
- 3.5. **Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by students.
- 3.6. **Students** includes everyone under the age of 18.
- 3.7. The following three safeguarding partners are identified in Keeping Students Safe in Education (and defined in the Students Act 2004, as amended by chapter 2 of the Students and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local students, including identifying and responding to their needs:
  - 3.7.1. The local authority (LA).
  - 3.7.2. A clinical commissioning group for an area within the LA.
  - 3.7.3. The chief officer of police for a police area in the LA area.

### Section 4: Equality statement

- 4.1. Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise students' diverse circumstances. We ensure that all students have the same protection, regardless of any barriers they may face.
- 4.2. We give special consideration to students who:
  - 4.2.1. Have special educational needs (SEN) or disabilities (see section 9).
  - 4.2.2. Are young carers.
  - 4.2.3. May experience discrimination due to their race, ethnicity, religion, gender identification or sexual orientation.
  - 4.2.4. Have English as an additional language.
  - 4.2.5. Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
  - 4.2.6. Are at risk of FGM, sexual exploitation, forced marriage, or radicalization.
  - 4.2.7. Are asylum seekers.
  - 4.2.8. Are at risk due to either their own or a family member's mental health needs.
  - 4.2.9. Are looked after or previously looked after (see section 11).

### Section 5: Roles and responsibilities

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

#### 5.2 All staff

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

## Highlands School: Student protection and safeguarding policy

5.2.2. All staff will be aware of:

- 5.2.2.1. Our systems which support safeguarding, including this student protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding leads (DSL) and [deputy/deputies], the behaviour policy, and the safeguarding response to students who go missing from education.
- 5.2.2.2. The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- 5.2.2.3. The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- 5.2.2.4. What to do if they identify a safeguarding issue or a student tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- 5.2.2.5. The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as student sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalization.

*Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.*

### 5.3 The designated safeguarding lead (DSL)

- 5.3.1. The DSL is a member of the senior leadership team. Our DSL is Michele Phillips, deputy headteacher. The DSL takes lead responsibility for student protection and wider safeguarding. The DSL is supported by Deputy DSLs.
- 5.3.2. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- 5.3.3. Outside of school hours the DSL can be contacted via their school email addresses or via [staysafe@highlearn.uk](mailto:staysafe@highlearn.uk).
- 5.3.4. When the DSL is absent the deputy DSLs should be contacted in the first instance. See page 3 for the full safeguarding team.
- 5.3.5. The DSL will be given the time, funding, training, resources and support to:**
  - 5.3.5.1. Provide advice and support to other staff on student welfare and student protection matters.
  - 5.3.5.2. Take part in strategy discussions and inter-agency meetings and/or support other staff to do so.
  - 5.3.5.3. Contribute to the assessment of students.
  - 5.3.5.4. Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly.
- 5.3.6. The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for student protection concerns as appropriate.
- 5.3.7. The full responsibilities of the DSL and [deputies] are set out in their job description.

### 5.4. The governing board

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

## Highlands School: Student protection and safeguarding policy

- 5.4.2. The governing board will appoint a link governor (this is Matt Miller, chair of governors) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- 5.4.3. The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).
- 5.4.4. All governors will read Keeping Students Safe in Education and sign a form confirming they understand the contents.
- 5.4.5. Section 15 of this policy has information on how governors are supported to fulfil their role.
- 5.4.6. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.

### 5.5. The headteacher

- 5.5.1. The headteacher is responsible for the implementation of this policy, including:
  - 5.5.1.1. Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy as part of their induction.
  - 5.5.1.2. Communicating this policy to parents/carers when their student joins the school and via the school website.
  - 5.5.1.3. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
  - 5.5.1.4. Ensuring that all staff undertake appropriate safeguarding and student protection training and update this regularly.
  - 5.5.1.5. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

## Section 6: Confidentiality and information sharing

- 6.1. Timely information sharing is essential to effective safeguarding.
- 6.2. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of students.
- 6.3. The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping students safe.
- 6.4. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of students and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk.
- 6.5. Staff should never promise a student that they will not tell anyone about a report of abuse, as this may not be in the student's best interests.
- 6.6. The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- 6.7. If staff are in any doubt about sharing information, they should speak to the DSL (or deputies).
- 6.8. Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.
- 6.9. For further information on how we are safeguarding confidential information, please refer to our [data protection policy](#).

## Section 7: Recognising abuse and taking action

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

### 7.2. If a student is suffering or likely to suffer harm, or is in immediate danger

- 7.2.1. The member of staff who becomes aware of a student who is suffering or likely to suffer harm, or in immediate danger, they should alert the DSL or a deputy DSL immediately. The concern must also be logged on CPOMS.
- 7.2.2. A member of the safeguarding team (usually the family liaison officer) will make a referral to children's social care and/or the police **immediately**. However, **anyone can make a referral**.
- 7.2.3. Any member of staff making a referral to children's social care must inform the DSL immediately.

### 7.3. If a student makes a disclosure to a member of staff

- 7.3.1. If a student discloses a safeguarding matter, staff should;
  - 7.3.1.1. Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
  - 7.3.1.2. Stay calm and do not show that you are shocked or upset.
  - 7.3.1.3. Tell the student they have done the right thing in telling you. Do not tell them they should have told you sooner.
  - 7.3.1.4. Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
  - 7.3.1.5. Log on CPOMS immediately (or as soon as is practicable).
  - 7.3.1.6. Speak to a DSL immediately if the student is in immediate risk or has been harmed. If the member of staff is teaching they should ask a colleague to cover them for a short period so that they can report the concern as soon as possible.
  - 7.3.1.7. Allegations about staff must be reported directly to the headteacher.

### 7.4. Recording a disclosure or safeguarding concern

- 7.4.1. The school uses CPOMS to record and report all child protection concerns and disclosures (but not allegations against staff).
- 7.4.2. All staff have a log in for CPOMS and should log any disclosures, child protection concerns, welfare concerns or any concerns about a student's well-being as soon as possible after they become aware of the issue and no later than the end of the school day.
- 7.4.3. Any child protection concerns, which may mean that a student is at immediate risk, has been harmed or has been subjected to a serious student protection issue eg: sexual abuse or physical violence, this must also be reported in person to one of the DSLs immediately.
- 7.4.4. CPOMS should not be used to report any concerns or allegations about members of staff. These concerns should be reported to the headteacher in accordance with the school's [whistleblowing policy](#).
- 7.4.5. All logs on CPOMS will be monitored by the two DSLs, heads of year and behaviour mentors and all new cases will be allocated to an appropriate member of staff to investigate. **See appendix 5** for information about how new student protection cases on CPOMS are allocated for investigation and follow up.
- 7.4.6. The family liaison officer will oversee the vulnerable students' spreadsheet and referrals to external agencies spreadsheet. They will also be the first point of contact for all referrals and communications with external agencies.
- 7.4.7. Decisions to refer a student to an external agency will be taken by the DSL and other staff in the safeguarding team. However, all staff can and have a duty to refer a student to an external agency if their request for a referral has not been agreed to by the DSL and they are concerned about the safety of a student. Referrals can be made by anyone in the community via the online portal. MASH should be called first for advice on 0208 379 5555.
- 7.4.8. <https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>



### 7.5 If a member of staff discovers that FGM has taken place or a student is at risk of FGM

- 7.5.1. The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- 7.5.2. FGM is illegal in the UK and a form of student abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 7.5.3. Possible indicators that a student has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4.
- 7.5.4. **Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **student under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 7.5.5. Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.
- 7.5.6. **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **student under 18** must speak to the DSL and follow our local safeguarding procedures.
- 7.5.7. The duty for teachers mentioned above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.
- 7.5.8. **Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM, must speak to the DSL who will make a referral to children's social care and the police.

### 7.6. If you have concerns about a student (as opposed to believing a student is suffering or likely to suffer from harm, or is in immediate danger)

- 7.6.1. Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a student's welfare.
- 7.6.2. Where possible, speak to the DSL first to agree a course of action.
- 7.6.3. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from Enfield multi-agency safeguarding hub – 0208 379 5555. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as practically possible. In these situations staff can also make a referral to children's social care directly. MASH can be called first on 0208 379 5555. Staff in this situation should share any action taken with the DSL as soon as possible.  
<https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>

### 7.7. Early help referrals

- 7.7.1. If early help is appropriate, the DSL will generally lead on this and make the appropriate referrals. Staff may be required to support other agencies and professionals in an early help assessment.
- 7.7.2. The DSL, with support of the family liaison officer, will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.
- 7.7.3. Referrals to early help are made through the Enfield portal.  
<https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>

### 7.8. Child protection referrals

- 7.8.1. If it is appropriate to refer the case to local authority children's social care or the police, the DSL will review the case and make the appropriate recommendations. The family liaison officer will complete all referrals under the direction of the DSL.
- 7.8.2. If a member of staff makes a referral directly they must tell the DSL as soon as possible.
- 7.8.3. Local authorities should make a decision within 1 working day of a referral about what course of action to take and should let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.
- 7.8.4. If the student's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the student's situation improves. This will usually involve making another referral or escalating the matter to a senior official within children's social care.
- 7.8.5. Referrals to children's social care are made through the Enfield portal. MASH can be telephoned first for advice on 0208 379 5555.  
<https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>

### 7.9. Concerns about extremism and radicalisation

- 7.9.1. If a student is not suffering or likely to suffer from harm, or in immediate danger, staff should where possible speak to the DSL first to agree a course of action if there are concerns relating to extremism and/or radicalisation.
- 7.9.2. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Staff should speak to a Deputy DSL who will seek advice from children's social care and make a referral to local authority children's social care directly, if appropriate. In rare and unlikely cases where there are no members of the safeguarding team or SLT available the member of staff can make a referral directly. In these cases staff should inform the DSL or deputy as soon as practically possible after the referral.
- 7.9.3. Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
- 7.9.4. Within in Enfield, all referrals relating to the radicalisation of a student are referred through the Enfield student's portal <https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>. This will also usually be referred to the police. MASH can be called for advice on 0208 379 5555.
- 7.9.5. The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a student. Staff can also email [counter.extremism@education.gov.uk](mailto:counter.extremism@education.gov.uk). Note that this is not for use in emergency situations.
- 7.9.6. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if
  - 7.9.6.1. Someone is in immediate danger.
  - 7.9.6.2. Someone may be planning to travel to join an extremist group.
  - 7.9.6.3. Something that may be terrorist-related is heard or seen.

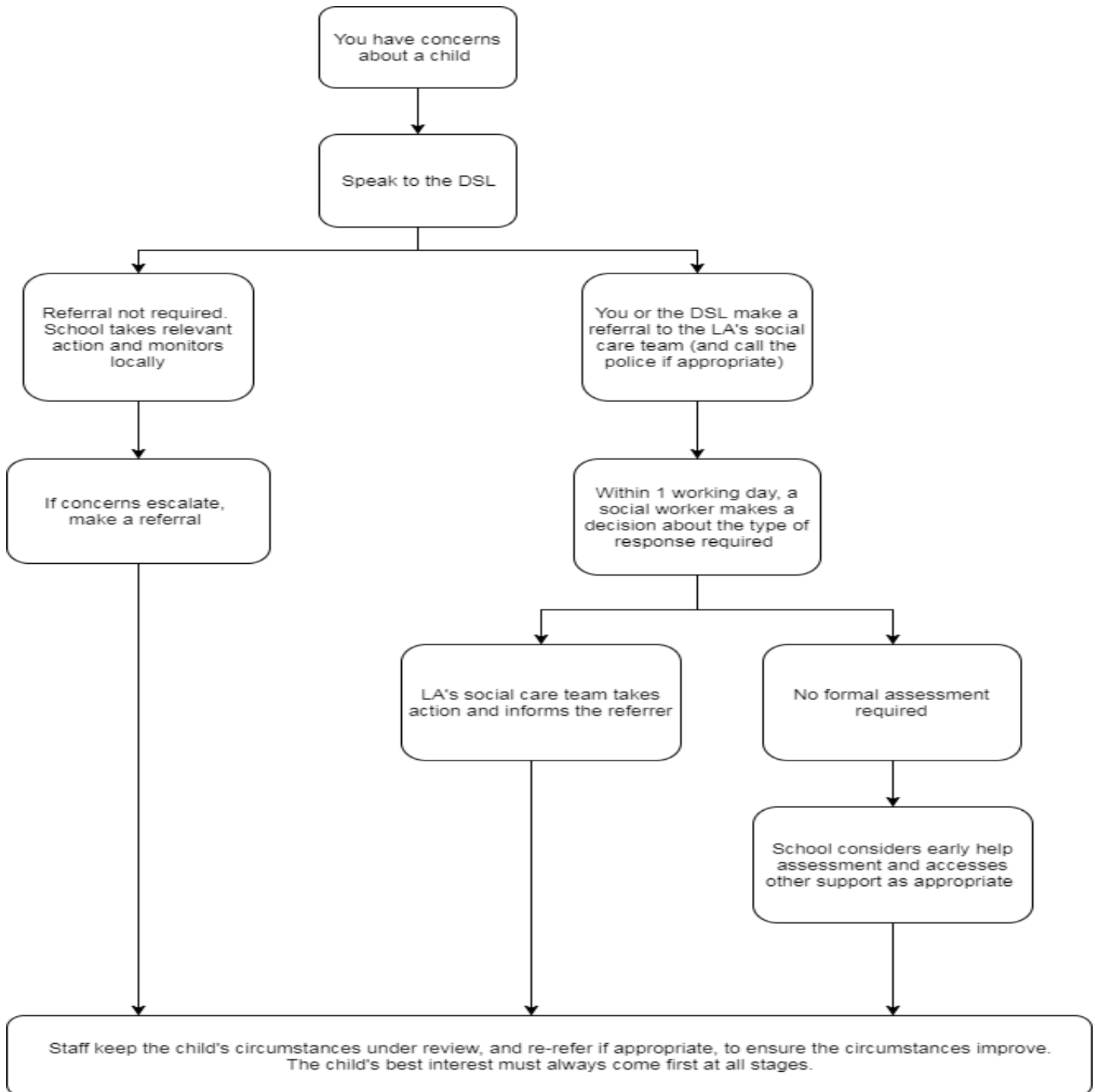
### 7.10. Concerns about mental health

- 7.10.1. Mental health problems can, in some cases, be an indicator that a student has suffered or is at risk of suffering abuse, neglect or exploitation.
- 7.10.2. Staff will be alert to behavioural signs that suggest a student may be experiencing a mental health problem or be at risk of developing one.

## Highlands School: Student protection and safeguarding policy

- 7.10.3. If there is a mental health concern about a student that is also a safeguarding concern, take immediate action by following the steps in the diagram below.
- 7.10.4. If there is a mental health concern about a student that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.
- 7.10.5. The Department for Education guidance on [mental health and behaviour in schools](#) provides further information.

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



(Note – if the DSL is unavailable, this should not delay action. See section 7 for what to do.)

### 7.11. Concerns about a staff member, supply teacher or volunteer

- 7.11.1 If there are concerns about a member of staff (including a supply teacher or volunteer), or an allegation is made about a member of staff (including a supply teacher or volunteer) posing a risk of harm to students, speak to the headteacher. In the absence of the headteacher, speak to Michele Phillips, deputy headteacher and DSL. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Please also see our [whistleblowing](#) policy for further details.

### 7.12 Allegations of abuse made against other students

- 7.12.1 We recognise that students are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.
- 7.12.2. We also recognise the gendered nature of peer-on-peer abuse. However, all peer-on-peer abuse is unacceptable and will be taken seriously.
- 7.12.3. Most cases of students hurting other students will be dealt with under our school’s behaviour policy, but this student protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:
- 7.12.3.1. Is serious, and potentially a criminal offence.
  - 7.12.3.2. Could put students in the school at risk.
  - 7.12.3.3. Is violent.
  - 7.12.3.4. Involves students being forced to use drugs or alcohol.
  - 7.12.3.5. Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting).
  - 7.12.3.6. If a student makes an allegation of abuse against another student:
    - 7.12.3.6.1. It must be recorded on CPOMS, but staff should not investigate it. A full investigation will be undertaken by the safeguarding team, led by the DSL.
    - 7.12.3.6.2. 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
    - 7.12.3.6.3. The DSL will put a risk assessment and support plan into place for all students involved (including the victim(s), the student(s) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
    - 7.12.3.6.4. The DSL will contact the child and adolescent mental health services (CAMHS), if appropriate
- 7.12.4. We will minimise the risk of peer-on-peer abuse by:**
- 7.12.4.1. Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
  - 7.12.4.2. Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
  - 7.12.4.3. Ensuring our curriculum helps to educate students about appropriate behaviour and consent.
  - 7.12.4.4. Ensuring students know they can talk to staff confidentially.
  - 7.12.4.5. Ensuring staff are trained to understand that a student harming a peer could be a sign that the student is being abused themselves, and that this would fall under the scope of this policy.

### **7.13. Responsibilities when responding to an incident or sharing indecent imagery or sexting.**

- 7.13.1. When made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), staff must report it to the DSL immediately.
- 7.13.2. Staff must **not**:
  - 7.13.2.1. View, download or share the imagery themselves or ask a student to share or download it. If a member of staff has already viewed the imagery by accident, they must report this to the DSL.
  - 7.13.2.2. Delete the imagery or ask the student to delete it.
  - 7.13.2.3. Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility).
  - 7.13.2.4. Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers (is is the DSL’s responsibility to take the appropriate action).
  - 7.13.2.5. Say or do anything to blame or shame any young people involved.
  - 7.13.2.6. Staff should explain to the student that they need to report the incident, and reassure the student(s) that they will receive support and help from the DSL.

### **7.14. Initial review meeting following the report of indecent images being shared (and or sexting)**

- 7.14.2. Following a report of such an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:
  - 7.14.2.1. Whether there is an immediate risk to student(s).
  - 7.14.2.2. If a referral needs to be made to the police and/or children’s social care.
  - 7.14.2.3. Any information about the images that is necessary to be aware of in order to safeguard the young person (in most cases, imagery should not be viewed).
  - 7.14.2.4. What further information is required to decide on the best response.
  - 7.14.2.5. Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).
  - 7.14.2.6. Whether immediate action should be taken to delete or remove images from devices or online services. The school’s police officer should be consulted.
  - 7.14.2.7. Any relevant facts about the students involved which would influence risk assessment.
  - 7.14.2.8. If there is a need to contact another school, college, setting or individual.
  - 7.14.2.9. Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved, unless this poses a safeguarding risk to the child).
- 7.14.3. The DSL will make an immediate referral to police and/or children’s social care if:
  - 7.14.3.1. The incident involves an adult.
  - 7.14.3.2. 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).
  - 7.14.3.3. What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent.
  - 7.14.3.4. The imagery involves sexual acts and any student in the imagery is under 13.
  - 7.14.3.5. The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

## Highlands School: Student protection and safeguarding policy

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.

### 7.15. Further review by the DSL

- 7.15.2. 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.
- 7.15.3. They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.
- 7.15.4. If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### 7.16. Informing parents/carers

- 7.16.2. 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 student at risk of harm.

### 7.17. Referring to the police

- 7.17.2. If a student is in immediate danger we will call 999. If a non-urgent criminal matter has occurred we will report this to our safer schools PC officer and we will report this by calling 101. All crime numbers will be reported on CPOMS.

### 7.18. Recording incidents

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

### 7.19. Curriculum coverage

- 7.19.2. Students are taught about the issues surrounding sexting as part of our PSHE and assembly programmes.

## Section 8: Notifying parents/carers

- 8.1. Discussions with parents/carers about student safeguarding concerns will be undertaken by a DSL or deputy DSL. This may be delegated to other members of the executive and wider safeguarding team, but only after discussion and agreement with the DSL.
- 8.2. If it is believed that notifying the parents/carers would increase the risk to the student, the DSL will discuss this with the local authority children's social care team before doing so.
- 8.3. In the case of allegations of abuse made against other students, we will normally notify the parents/parents of all the students involved.

## Section 9: Students with special educational needs and disabilities

- 9.1. We recognise that students with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:
  - 9.1.1. Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.
  - 9.1.2. Students being more prone to peer group isolation than other students.
  - 9.1.3. The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
  - 9.1.4. Communication barriers and difficulties in overcoming these barriers. All students with an EHCP have a key worker who knows the student well.
  - 9.1.5.

### Section 10: Students with a social worker

- 10.1. Students may need a social worker due to safeguarding or welfare needs. We recognise that a student'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.
- 10.2. The DSL and all members of staff will work with and support social workers to help protect vulnerable students.
- 10.3. Where we are aware that a student has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student's safety, welfare and educational outcomes. For example, it will inform decisions about:
  - 10.3.1. Responding to unauthorised absence or missing education where there are known safeguarding risks.
  - 10.3.2. The provision of pastoral and/or academic support.

### Section 11: Looked-after and previously looked-after children

- 11.1. We will ensure that staff have the skills, knowledge and understanding to keep looked-after students and previously looked-after students safe. In particular, we will ensure that:
  - 11.1.1. Appropriate staff have relevant information about students' looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.
  - 11.1.2. The DSL has details of students' social worker and relevant virtual school heads.
  - 11.1.3. We have appointed a designated teacher, [Jody Larter, Assistant Headteacher] who is responsible for promoting the educational achievement of looked-after students and previously looked-after students in line with [statutory guidance](#).
  - 11.1.4. The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- 11.2. As part of their role, the designated teacher will:
  - 11.2.1. Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after students are quickly and effectively responded to.
  - 11.2.2. Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after students, including discussing how student premium plus funding can be best used to support looked-after students and meet the needs identified in their personal education plans (PEP).

### Section 12: Mobile phones and cameras

- 12.1. Staff will not take pictures or recordings of students on their personal phones or cameras. However, permission may be granted at the discretion of the headteacher. Staff who believe that they have a sound educational reason to use a personal phone/device to take photos of students, eg for a sports fixture or a school trip, must put their request in writing to the headteacher and await a response before any photos are taken.
- 12.2. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.
- 12.3. Students are not permitted to use their mobile phones or any electronic devices while on the school site. Our behaviour policy outlines school rules on mobile phones for students.

### Section 13: Complaints and concerns about staff and school policies

#### 13.1 Complaints against staff and other complaints

The information in this section is a summary of our complaints procedure, taken from our separate complaints policy, which can be read in full on our website [here](#).

## Highlands School: Student protection and safeguarding policy

- 13.1.1. Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).
- 13.1.2. Complaints against staff made about another staff member should be made directly to the headteacher either via email or in person.
- 13.1.3. Complaints against staff from a parent/carer or other member of the community can be made in one of the following ways
  - 13.1.3.1. By telephoning the school on 0208370 1100 to ask to speak to a member of the senior leadership team.
  - 13.1.3.2. By writing to the headteacher at [postbox@highlands.enfield.sch.uk](mailto:postbox@highlands.enfield.sch.uk).

### 13.2 Whistle-blowing

- 13.2.1. We have a separate whistle blowing policy, which can be read in full on our website. A summary of how to report a concern about a member of staff is summarized in section 13.1 above. If the concern is about the headteacher, this should be via email or by a letter addressed to the Chair of Governors.

## Section 14: Record-keeping

- 14.1. We will hold records in line with our records retention schedule.
- 14.2. All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on CPOMS. If a member of staff is in any doubt about whether to record something, they should discuss it with the DSL.
- 14.3. Non-confidential records will be accessible and available in a student's hard file, which are kept in the main office.
- 14.4. Since October 2019 confidential safeguarding information and records have been held securely on CPOMS and only available to those who have a right or professional need to see them. Confidential paper documents sent to the school of a safeguarding nature eg: a student's hard copy child protection file from primary school, will be stored in a locked cabinet in the family liaison officer's office. We will log on CPOMS that the file has been received and we will summarise the main concerns indicated in the file and any actions arising from the transfer of this file to our school. Where the files are not prohibitively large, they will be also be scanned and uploaded to the student's CPOMS file.
- 14.5. Safeguarding records relating to individual students will be retained for a reasonable period of time and until they are 25 years of age.
- 14.6. If a student for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their student protection file is forwarded promptly and securely, and separately from the main student file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the student.
- 14.7. In addition:
  - 14.7.1. Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks.
  - 14.7.2. Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## Section 15: Training

### 15.1 All staff

- 15.1.1. All staff members will undertake safeguarding and child protection training at induction, which will include the whistle-blowing procedures, to ensure they understand the school's safeguarding



## Highlands School: Student protection and safeguarding policy

systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.

- 15.1.2. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify students at risk of being drawn into terrorism and to challenge extremist ideas.
- 15.1.3. Staff will also receive regular safeguarding and student protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.
- 15.1.4. Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.
- 15.1.5. Volunteers will receive appropriate training, if applicable.

### 15.2. The DSL and deputy DSLs

- 15.2.1. The DSL and deputy DSLs will undertake student protection and safeguarding training at least every 2 years.
- 15.2.2. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).
- 15.2.3. They will also undertake Prevent awareness training.

### 15.3. Governors

- 15.3.1. All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.
- 15.3.2. As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### 15.4 Recruitment – interview panels

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

### 15.5 Safeguarding staff

- 15.5.1. All staff who are part of the safeguarding team will be offered supervision which will provide them with support, coaching and training, promote the interests of students and allow for confidential discussions of sensitive issues.

## Section 16: Monitoring arrangements

- 16.1. This policy will be reviewed **annually** by the deputy headteacher/DSL. At every review, it will be approved by the full governing board.

## Section 17: Links with other policies

- 17.1. This policy links to the following policies and procedures:
  - 17.1.1. Behaviour policy
  - 17.1.2. Staff code of conduct policy
  - 17.1.3. Complaints policy

## Highlands School: Student protection and safeguarding policy

- 17.1.4. Health and safety policy
- 17.1.5. Attendance and punctuality policy
- 17.1.6. Online safety
- 17.1.7. Equal opportunities policy
- 17.1.8. RSHE and PSHE policy
- 17.1.9. First aid
- 17.1.10 Curriculum policy
- 17.1.11. Data protection policy

# Appendices

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

### Appendix 1: Types of abuse

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

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

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

Emotional abuse may involve:

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

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

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing.
- Non-contact activities, such as involving students in looking at, or in the production of, sexual images, watching sexual activities, encouraging students to behave in sexually inappropriate ways, or grooming a student in preparation for abuse (including via the internet).

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

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

Once a student 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 student from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.

It may also include neglect of, or unresponsiveness to, a student's basic emotional needs.

### **Appendix 2: Safer recruitment and DBS checks – policy and procedures**

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

#### **New staff**

When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with students.

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

- responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising students; or
- carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with students; or
- engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

#### **Existing staff**

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

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

18. we believe the individual has engaged in [relevant conduct](#); or
19. the individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

## Highlands School: Student protection and safeguarding policy

20. the 'harm test' is satisfied in respect of the individual (i.e. they may harm a student or vulnerable adult or put them at risk of harm); and
21. The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

### Agency and third-party staff

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

### Contractors

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

This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with students
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

### Trainee/student teachers

- Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.
- Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with students.

### Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

### Governors

- All governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).
- Other checks deemed necessary if they have lived or worked outside the UK

## Highlands School: Student protection and safeguarding policy

### Staff working in alternative provision settings

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

### Adults who supervise students on work experience

- When organising work experience, we will ensure that policies and procedures are in place to protect students from harm.
- We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### Students staying with host families

- Where the school makes arrangements for students to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.
- Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

### **Appendix 3: Allegations of abuse made against staff**

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

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

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

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

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

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

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

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

- Redeployment within the school so that the individual does not have direct contact with the student or students concerned.
- Providing an assistant to be present when the individual has contact with students.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to students
- Moving the student or students 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.

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

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

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

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:



## Highlands School: Student protection and safeguarding policy

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to students 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, 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 students 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, as appropriate.
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
- Inform the parents or carers of the student/students involved about the allegation as soon as possible if they do not already know (following agreement with children's social care 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.
- 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 student, or if the individual otherwise poses a risk of harm to a student.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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

### **Additional considerations for supply staff**

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

## Highlands School: Student protection and safeguarding policy

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

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

### Timescales

Any cases where it is clear immediately that the allegation is unfounded or malicious will be resolved within 1 week wherever possible.

- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

### Specific actions

#### Action following a criminal investigation or prosecution

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

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

- If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If they think that the individual has engaged in conduct that has harmed (or is likely to harm) a student, or if they think the person otherwise poses a risk of harm to a student, they must make a referral to the DBS.
- If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

#### Individuals returning to work after suspension

- If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.
- The case manager will also consider how best to manage the individual's contact with the student or students who made the allegation, if they are still attending the school.

#### Unsubstantiated or malicious allegations

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

## Highlands School: Student protection and safeguarding policy

### Confidentiality

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

The case manager will take advice from the local authority's designated officer, police and children's social care, 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 student/students involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation
- How to manage press interest if, and when, it arises.

### Record-keeping

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

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

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

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

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

### References

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

### Learning lessons

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

This will include consideration of (as applicable):

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

### **Appendix 4: Specific safeguarding issues**

This appendix is based on the advice in annex A of Keeping Children Safe in Education.

#### **Students missing from education**

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

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

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

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

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

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

#### **Student criminal exploitation**

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

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

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

Indicators of CCE can include a student:

- Appearing with unexplained gifts or new possessions.
- Associating with other young people involved in exploitation.

## Highlands School: Student protection and safeguarding policy

- Suffering from changes in emotional wellbeing.
- Misusing drugs and alcohol.
- Going missing for periods of time or regularly coming home late.
- Regularly missing school or education.
- Not taking part in education.

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

### Student sexual exploitation

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

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

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

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

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

- Having an older boyfriend or girlfriend.
- Suffering from sexually transmitted infections or becoming pregnant.
- If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care and the police, if appropriate.

### Domestic abuse

- Students can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a student may blame themselves for the abuse or may have had to leave the family home as a result.
- Older students may also experience domestic abuse and/or violence in their own personal relationships.
- Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on students.
- If police are called to an incident of domestic abuse and any students in the household have experienced the incident, the police should inform the school (usually the designated safeguarding lead) before the student or students arrive at school the following day. This is the procedure where police forces are part of [Operation Encompass](#).
- The DSL will provide support according to the student's needs and update records about their circumstances.

### Homelessness

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

## Highlands School: Student protection and safeguarding policy

- The DSL deputy DSLs will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
- Where a student has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

### Honour-based abuse (including FGM and forced marriage)

- Honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
- Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.
- All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a student being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

### FGM

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

Section 7.5 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent/carer or family member expressing concern that FGM may be carried out.

## Highlands School: Student protection and safeguarding policy

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”.
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other students about it (although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her ‘red book’ (student health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.

The above indicators and risk factors are not intended to be exhaustive.

### Forced marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

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

### Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **Terrorism** is an action that:
  - Endangers or causes serious violence to a person/people;

## Highlands School: Student protection and safeguarding policy

- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system
- The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

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

Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a student is being radicalised can include:

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

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

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

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

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.



## Highlands School: Student protection and safeguarding policy

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

### Missing students

Our procedures are designed to ensure that a missing student is found and returned to effective supervision as soon as possible.

- If a student is missing from education, we will follow the procedures set out in appendix 4 of this policy.
- If a student walks out of school we will contact the parent/carer immediately. If the student does not return home, we will contact the police. Once the student is found we will implement our serious incident process and the student will receive a sanction in accordance with our behaviour policy, if appropriate.
- If a student goes missing during the school day we will contact the parent/carer immediately and conduct a full search of the building. If the student cannot be found, we will contact the police. Once the student is found we will implement our serious incident process and the student will receive a sanction in accordance with our behaviour policy, if appropriate.

## Highlands School: Student protection and safeguarding policy

### Appendix 5: Operational structure for the logging and monitoring of child protection concerns

#### Logging of information, concerns and disclosures

- Any member of staff with a concern (this must include site staff, and all support staff), however small (ranging from a child seems upset or hungry, to bruises and disclosures), logs this on CPOMS within 2 hours of being made aware of the concern. Any matters relating to a child being at risk of harm, harming themselves or others must ALSO be reported verbally to the DSL or DDSL immediately.
- Staff are trained to NEVER dismiss any concern, however small (this level of judgement and evaluation is for the safeguarding team to investigate and evaluate). Logging on concerns must be swift and contain all relevant information

#### Daily CPOMS System

1. The DSLs are expected to know about and be up to date on all child protection cases and matters.
2. The DSLs will regularly monitor CPOMS logs using the CPOMS reporting and monitoring tools, and meet with pastoral and safeguarding staff.
3. Behaviour mentors monitor CPOMS for their year group throughout the day. They use the CPOMS operational structure document to decide whether they can deal with the issue. If they cannot, then the case is assigned to the relevant member of staff according to the operational structure document. Behaviour mentors know that if any new cases arise and meet the medium to high risk categories then they must speak in person to a DSL [immediately].
4. Heads of year then check CPOMS at least once a day to ensure that their behavior mentor has dealt appropriately with all matters logged throughout the day. The head of year deals with any matters assigned to them.
5. The family liaison officer monitors CPOMS in its entirety throughout the day and picks up on any urgent matters or matters that haven't been addressed.
6. The DSL or DDSL deal with all high and extreme risk cases throughout the day.

#### Low risk

Pupils with no serious CP history: currently presenting attendance issues, low risk welfare, hygiene, eating, friendships, stress, sleeping in lessons, low level anxiety, and illness. Mostly isolated occurrences.

#### Medium risk

Pupils for whom there have been previous and repeated low risk concerns, early school based intervention to be put in place, doesn't qualify for external agency intervention.

#### High risk

Concerns raised about a child who is already CiN, CP, LAC or has a social worker or early help worker. OR new concerns relating domestic violence, parent's mental health, self-harm, child's mental health, all forms of abuse OR information sent into the school via external agencies, and external agency requests for information.

#### Extreme risk

Disclosures and referrals relating to any issue relating to a crime: FGM, gangs, weapons, CSE, county lines, grooming, sharing of inappropriate images

**Referred to behaviour mentor, matron, school counsellor for welfare check and further follow up, or matron if medical.**  
Staff member speaks to the child and logs discussion on CPOMS, recommending next steps if needed. Calls home to keep parents informed unless it is a risk to the child to do so (inform DSL and escalate up).

**Referred to head of year for further investigation and to decide with BM what support is needed?**  
Discussion with the safeguarding team about whether this student might qualify for early help. If not, then head of year to oversee intervention and support in school. This will include some or all of the following  
-Monitoring, support from BM, PSP, counselling, TAF, CAMHS, referral to FLO

**Followed up by DSL or one of the DDSLs**  
The DSL or DDSL will speak to the child, with another member of staff present (SLT or safeguarding team) and the DSL will write a transcript of what the student says and then MASH called for advice, ascertaining whether parents/cares should be notified and then a referral made as directed by MASH. If the child already is known to EH or CSC then social worker or EH worker informed.

**Followed up by DSL.**  
In all these cases MASH and police contact should be made asap once as much info as possible has been established. Contact can be made first with the safer schools police officer, but usually a call 101 needs to be placed (999 in immediate danger). Parents contacted if safe/appropriate to do so. A child protection referral should also be completed.