



# Highlands

## School & Sixth Form

**Dare to  
flourish**

### **Safeguarding policy**

### **APPROVED**

Governor Committee	School standards and performance
Reviewed on	September 2024
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## Named personnel with designated responsibility for safeguarding

<b>The executive safeguarding team</b>
<p><b>Anna Toouli</b> - Senior assistant headteacher Designated safeguarding lead, strategic safeguarding <a href="mailto:tooulia@highlearn.uk">tooulia@highlearn.uk</a></p>
<p><b>Matt Miller</b>- Chair of governors Safeguarding link governor <a href="mailto:millerm@highlearn.uk">millerm@highlearn.uk</a></p>
<p><b>Aygul Husseyin</b> - Senior assistant headteacher Deputy designated safeguarding lead <a href="mailto:husseyina@highlearn.uk">husseyina@highlearn.uk</a></p>
<p><b>Tom Hurst</b> – Deputy headteacher Deputy designated safeguarding lead <a href="mailto:hurstt@highlearn.uk">hurstt@highlearn.uk</a></p>
<p><b>Ephie Petrou</b> – Associate assistant headteacher Deputy designated safeguarding lead <a href="mailto:petroue@highlearn.uk">petroue@highlearn.uk</a></p>
<p><b>Armenay Jeynes</b> – Associate assistant headteacher Deputy designated safeguarding lead <a href="mailto:jeynesa@highlearn.uk">jeynesa@highlearn.uk</a></p>
<p><b>Rachel Halstead</b> – Associate assistant headteacher Deputy designated safeguarding lead <a href="mailto:halstear@highlearn.uk">halstear@highlearn.uk</a></p>
<p><b>Shiv Hutchinson</b> – Associate assistant headteacher Deputy designated safeguarding lead <a href="mailto:hutchinsons@highlearn.uk">hutchinsons@highlearn.uk</a></p>
<p><b>Kyri Savvides</b> - Associate assistant headteacher Deputy designated safeguarding lead <a href="mailto:savvidek@highlearn.uk">savvidek@highlearn.uk</a></p>
<p><b>Denise Norton</b> - Safeguarding manager Deputy designated safeguarding lead, first point of contact for all external agencies <a href="mailto:nortond@highlearn.uk">nortond@highlearn.uk</a></p>

**Nina Harrington** - Inclusion officer  
Deputy designated safeguarding lead, LAC  
[harrigtonn@highlearn.uk](mailto:harrigtonn@highlearn.uk)

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

**Safeguarding support team**

Head of year 7 – Vicki Berrill	Behaviour mentor – Steven Carrim
Head of year 8 – Will Edwards	Behaviour mentor – Katherine Forshaw
Head of year 9 – Kyri Savvides	Behaviour mentor – Patricia Brown
Head of year 10 – Josh Friend	Behaviour mentor – Mike O’Doherty
Head of year 11 – Rachel Halstead	Behaviour mentor – Nathalia O’Sullivan
Head of year 12 - Suel Halil	Assistant head of year – Kara Gunning
Head of year 13 – Muna Sheikh	Assistant head of year – Kara Gunning

## Section 1: Introduction and aims

At Highlands School, we are committed to safeguarding and promoting the welfare of children. We expect all staff, visitors and volunteers to share this commitment and to play an active role in protecting and preventing our students from harm. The school leadership team ensures that safeguarding is a school priority at all times. We have a number of policies that contribute to providing a calm, caring and safe school, which promotes the social, physical, mental and moral development of all students. Our stay safe curriculum ensures that students are taught how to keep themselves and others safe.

This policy will be read in conjunction with the following policies:

- Behaviour policy.
- Safer recruitment policy.
- Staff code of conduct policy.
- Whistle blowing policy.
- Health and safety policy.
- Attendance and punctuality policy.
- Online safety policy.
- RSE and PSHE policy.
- Equal opportunities policy.
- Medical conditions and first aid policy.
- Data protection policy.
- SEND policy.
- Mental health policy
- Drug policy

### The school aims to ensure that

- appropriate action is taken to safeguard all students and promote student welfare.
- appropriate action is taken in a timely manner to respond to child protection concerns.
- all staff are aware of their statutory responsibilities with respect to safeguarding and child protection.
- staff receive quality training to ensure they are confident in recognising and reporting child protection issues and in carrying out their safeguarding duties.

## Section 2: Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(September 2024\)](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of students.
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques.

- The Children's Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
- Sexual violence and harassment in schools May 2018.
- Disqualification under the childcare act 2006.
- Promoting and supporting mental health and well-being in schools and colleges – June 2021
- 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.
- Enfield Children's Services - Threshold Guidance. A guide for Multi Agency Partners, 2018-21.
- Enfield safeguarding children partnership arrangements - June 2019.
- Enfield Early Help for All Strategy 2021-2025

### Section 3: Definitions

**Safeguarding** is what we do to prevent harm, while **child protection** is the way in which we respond to harm.

Safeguarding and promoting the welfare of students means

- Protecting students from maltreatment.
- Preventing impairment of students' mental and physical health or development.
- Ensuring that students grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all students to have the best outcomes.
- **Child protection** is part of this definition and refers to activities undertaken to prevent students suffering or being likely to suffer significant harm.
- **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.
- **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.
- **Sexting** is defined as the production and/or sharing of sexual photos and videos of and by young people who are under the age of 18. It includes nude or nearly nude images and/or sexual acts. It is also referred to as 'youth produced sexual imagery'. 'Sexting' does not include the sharing of sexual photos and videos of under-18 year olds with or by adults. This is a form of child sexual abuse and must be referred to the police.
- **Contextual Safeguarding** is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse.
- A child includes everyone under the age of 18.
- **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. The three safeguarding partners in Enfield Local Authority are as follows:

Metropolitan Police Service.

Enfield Council.

The NHS, including our hospitals and Clinical Commissioning Group, schools, social care providers, 3<sup>rd</sup> sector organisations eg; probation services.

#### **Section 4: Equality statement**

Some students have an increased risk of abuse, and additional barriers can exist for some students with respect to recognising or disclosing abuse. 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.

We give special consideration to the following students. This list is not exhaustive and there may be other students we give special consideration to the following groups of students.

- Students with special educational needs (SEN) or disabilities (see section 9).
- Students who are young carers.
- Students who may experience discrimination due to their race, ethnicity, religion, gender identification or sexual orientation.
- Students with English as an additional language.
- Students who are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Students who are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Students who are asylum seekers.
- Students who are at risk due to either their own or a family member's mental health needs.
- Students who are looked after or previously looked after.

#### **Section 5: Roles and responsibilities**

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

##### **All staff**

- All staff will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually as part of the school's annual safeguarding training. All staff will also complete a quiz and declaration to demonstrate their understanding of Part 1.

All staff will be aware of

- our systems which support safeguarding, including this policy, the staff code of conduct, the role and identity of the designated safeguarding leads (DSL) and [deputy/deputies], the behaviour policy, and the process for students who go missing from education.
- 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.



- the process for making referrals to local authority children’s social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- what to do if they identify a child protection 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.
- 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 radicalisation.
- professional behaviours that are in accordance with our staff code of conduct, Teachers’ Standards and this safeguarding policy.
- staff must not give their personal phone number, address or personal email address to students.
- staff must not transport students in their personal vehicle, unless they have been given permission in writing by the headteacher to do so and they have the required insurance in place.
- staff are only permitted to conduct home visits that have been authorised by the headteacher or the DSL and the relevant procedures have been followed. See Appendix 8 for the school home visit procedures.

### **The executive safeguarding team**

At Highlands School, we have an executive safeguarding team, led by the DSL. The names and contact details of the executive safeguarding team can be found on page 1 of this policy. All members of the executive safeguarding team are also Deputy DSLs (apart from Anna Toouli who is the DSL) and attend the weekly executive safeguarding meeting.

### **The designated safeguarding lead (DSL)**

In addition to the list below, our DSL will follow the job description set out in Annex C of KCSIE September 2023. Please see Appendix 7 for the full role of the designated safeguarding lead:

- The DSL is a member of the senior leadership team. Our DSL is Anna Toouli, senior assistant headteacher.
- The DSL takes lead responsibility for child protection and all wider safeguarding matters as outlined in KCSIE. The DSL is supported by Deputy DSLs.
- The DSL holds all Deputy DSLs to account.
- The DSL coordinates and chairs the weekly executive safeguarding meeting (although this may be delegated to an experienced Deputy DSL who is also a member of the senior leadership team).
- During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
- Outside of school hours the DSL can be contacted via their school email address or via [staysafe@highlearn.uk](mailto:staysafe@highlearn.uk). Students can also report any safeguarding concerns discretely to the [staysafe@highlearn.uk](mailto:staysafe@highlearn.uk) account.
- When the DSL is absent the Deputy DSLs will be contacted in the first instance. See page 1 for the full safeguarding team and Appendix 6 for the responsibilities of each of the Deputy DSLs.
- Provide advice and support to other staff on student welfare and child protection matters.
- Take part in strategic discussions and inter-agency meetings and/or support other staff to do so.
- Contribute to the assessment of students.
- 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.
- Keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

**The DSL will be given the time, funding, training, resources and support to carry out their role.**

### **The deputy designated safeguarding leads (DDSLs)**

- Deputy DSLs support the DSL.
- The role of each of our Deputy DSLs can be found in [Appendix 7 of this policy](#).

### **The governing board**

- 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.
- The governing board will appoint a link governor (this is currently 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.
- 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 4](#)).
- All governors will read Keeping Students Safe in Education and sign a form confirming they understand the contents.

### **The headteacher**

The headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy as part of their induction.
- Sharing this policy to parents/carers and all stakeholders.
- Ensuring that this policy is made available on the school website.
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training.
- 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**

Timely information sharing is essential to effective safeguarding:

- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety of students.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping students safe.
- 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, if it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a student at risk.
- Staff will never promise a student that they will not pass on child protection concerns to the relevant staff and agencies. However, the member of staff receiving the disclosure will reassure the child that only relevant staff will be informed and that staff will be sensitive to the student's feelings and concerns.

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.
- If staff are in any doubt about sharing information, they will speak to the DSL (or deputies).
- Confidentiality is also addressed in this policy with respect to record-keeping in Section 19 and allegations of abuse against staff in Appendix 4.
- For further information on how we are safeguarding confidential information, please refer to our data protection policy.

## Section 7: Recognising abuse

Staff, volunteers and governors must be aware of the categories of child abuse, indicators and signs of abuse, and the various types of safeguarding issues as outlined in KCSIE September 2023. Staff must then follow the procedures in section 8 of this policy to report any child protection concerns.

**Categories of child abuse** - see Appendix 1 for further detail.

<b>Sexual</b>	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.
<b>Physical</b>	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.
<b>Emotional</b>	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.
<b>Neglect</b>	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.

### Indicators and signs of child abuse:

- Displaying disruptive or anti-social behaviour.
- Being bullied or bullying others.
- Regularly miss school or education or do not take part in education.
- Go missing for periods of time or regularly come home late.
- Being involved in, or at risk of, offending.
- Having poor general health.
- Suffer from changes in emotional well-being.
- Having anxiety, depression or other mental health issues.
- Misusing drugs or alcohol.
- Having a particularly challenging relationship with parents/carers.
- Appearing to be unusually independent of their parents/carers.
- Experiencing difficulties at home.
- Appear with unexplained gifts, money or new possessions.
- Associate with other children involved in exploitation.
- Have older boyfriends or girlfriends.

- Suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

**All staff must be aware of the following safeguarding issues** (detailed information of each of the issues below can be found in [Appendix 2](#) of this policy):

- Child abduction.
- Community safety incidents.
- Children and the court system.
- Children missing from education.
- Children with family members in prison .
- Child criminal exploitation (CCE).
- Child sexual exploitation (CSE).
- County lines.
- Mental health.
- Modern slavery.
- Cybercrime.
- Domestic violence.
- Homelessness.
- Honour based violence.
- FGM.
- Forced marriage.
- Radicalisation.
- child on child abuse.
- Sexual violence, sexual harassment, upskirting.

## **Section 8: Procedures for reporting and recording child protection concerns**

Staff usually become aware of safeguarding and child protection concerns in the following ways:

- They notice signs of possible abuse.
- A student discloses that they are being abused or are at risk of abuse.
- They receive information from a third party, or overhear information.

All safeguarding concerns are logged on CPOMS, alongside additional reporting processes depending on the nature of the child protection concern.

### **8.1 Reporting and recording concerns for a student who is suffering or likely to suffer harm, or is in immediate danger**

- A member of staff who becomes aware of a student who is suffering or likely to suffer harm, or is in immediate danger, should speak to the DSL or a Deputy DSL in person immediately. The concern must be written up in detail on CPOMS as soon as is practicably possible (see section 8.2 on how to record a safeguarding concern on CPOMS). The DSL, along with the relevant Deputy DSLs will review the case and decide on the next steps.
- Staff who receive a disclosure from a student regarding a crime or a serious safeguarding concern, must make a written record on CPOMS as immediately as possible after the disclosure and ensure that this

disclosures reflects the students words as actually as possible. Further information on how to receive a disclosure can be found in section 8.3 of this policy.

- Where required, a member of the executive safeguarding team (usually the safeguarding manager) will make a referral to children’s social care and/or the police. A phone call to Enfield MASH will usually be made in the first instance, for advice and guidance, particularly on whether parents/carers will be informed of this situation. **In some cases informing parents/carers may cause the student to be unsafe.**
- In the unlikely situation that a member of staff feels that their concern has not been taken seriously or actioned, they will speak to the headteacher to convey their concerns. If the matter is still not resolved, then any member of staff can contact the Enfield multi-agency safeguarding hub – 0208 379 5555. Staff can also seek advice at any time from the NSPCC helpline on 0808 800 5000. In these situations, staff can also make a referral to children’s social care directly. MASH can be called first on 0208 379 5555 and then a referral can be made using the link below. Staff in this situation will share any action taken with the DSL as soon as possible <https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>.
- Any member of staff making a referral to children’s social care must inform the DSL immediately.

## 8.2 Recording child protection or welfare concerns on CPOMS [where a student is not in immediate danger)

- The school uses CPOMS to record, report and monitor all welfare, mental health, attendance, bullying and child protection concerns and disclosures.
- CPOMS should not be used to report any concerns or allegations about members of staff. These concerns will be reported to the headteacher in accordance with the school’s [Whistleblowing policy](#).
- Staff should log the concern on CPOMS with as much detail as possible. This will include the date and time they became aware of the matter, the reason for their concern. Staff will not take it upon themselves to investigate potential child protection matters. The member of staff logging the concern should also select the most appropriate category tags on CPOMS.
- All staff have a login for CPOMS and will log any disclosure forms, child protection concerns, welfare concerns or any concerns about a student’s mental health and well-being as soon as possible after they become aware of the issue and no later than the end of the school day.

## 8.3 Receiving and recording a disclosure from a student

When staff receive a disclosure from a student the primary focus is to give the student full attention and ensure that they feel comfortable in making their disclosure. The school has a safeguarding disclosure form which can be used by staff when they receive a disclosure from a student and they do not have access to CPOMS (for example when on a school trip). In most cases the staff member will listen to the disclosure and then immediately after they should make a record of the disclosure, as accurately as possible in the student's words, on CPOMS. If the disclosure relates to an allegation against a member of staff, the disclosure should be referred to the headteacher both in person and in writing. If the allegation is against the headteacher then the disclosure should be sent to Mr Matt Miller, the Chair of Governors.

A member of staff who becomes aware of a student who is suffering or likely to suffer harm, or in immediate danger, should speak to the DSL or a Deputy DSL in person immediately.

Procedure for receiving a disclosure from a student

**1. Location:**

- The staff member should ensure that they are in a quiet and comfortable space where the student can speak privately. There must not be other students in the room or near enough to hear the conversation.
- Any other adults in the room must be there by agreement with the student, for the purposes of supporting the student during the disclosure. There must not be other adults in the room at their computers getting on with work. This means that disclosures will not be received in shared offices, or spaces where it is possible that a colleague may enter the room.

**2. Do not promise confidentiality:**

- Do not promise complete confidentiality, but be clear that only the necessary adults will be informed.
- The student may have fears about what will happen next, so tell the student what you are going to do, what is going to happen next, and who else you or they will need to talk to.
- This will help the student feel some control over what happens next.

**3. Receive:**

- Listen to what is being said without displaying shock, horror or disbelief.
- A common reaction to news as unpleasant and shocking as child abuse is denial. However, if you display denial to a student or show shock or disgust at what they are saying, the student may be afraid to continue and will shut down.
- Accept what is being said without judgement.
- Take it seriously.
- Leave it to the safeguarding team to investigate.

**4. Reassure:**

- Reassure the student that they did nothing wrong and that you believe them. If the student discloses that they are the perpetrator of the abuse, reassure them that they are doing the right thing by telling you.
- Reassure all students who make a disclosure that they did the right thing by telling you.

**5. Listen and do not make assumptions:**

- Listen more than you talk, and avoid advice giving or problem solving.
- Do not put words in the student's mouth or assume you know what they mean or are going to say.
- Let the student use language they are comfortable with.
- Let the student set the pace and do not rush them.

**6. Do not interrogate:**

- Do not ask the student a lot of questions, especially leading questions, which means a question in which you provide a possible answer (examples: Did this or that happen? Were you at school? Did your uncle hit you on the leg?). This can be confusing for the student and they might shut down. Do not ask the student for details. This can make it harder for the student to tell you about the abuse.
- **Don't ask questions that imply the student was at fault for example:**
  - Why didn't you tell me before?
  - What were you doing there?
  - Why didn't you stop it?
  - What did you do to make this happen?
  - Are you telling the truth?

7. **Limit questioning to only the following questions if the child has not already provided you with this information:**
  - What happened?
  - When did it happen?
  - Where did it happen?
  - Who did it?
  - How do you know them? (If the relationship of the abuser is unclear).
  
8. **Make a written record:**
  - Write down the disclosure in the student's words and log this on CPOMS as immediately as possible.
  - Contemporaneous records may be required if the case goes to court.
  
9. **Be supportive, not judgmental:**
  - **Do not** talk negatively. Even though the student may be disclosing terrible things that may have happened at the hands of a family member or friend, the child may still love that person and may only just be beginning to recognise that they were being abused. Reassure the student that they are not at fault and have done nothing wrong.

### Next steps after receiving the disclosure

1. If the disclosure relates to a crime, and/or the student has been harmed and/or is about to be harmed, and/or the student is upset/distressed, they should not be sent back to lessons. The member of staff who received the disclosure should place the student in a safe space while they discuss the disclosure with a member of the executive safeguarding team (the student should not be sent back to lessons). These places could be any from the list below (the student should not be left alone).
  - The place where the student made the disclosure.
  - The medical room with the welfare officer.
  - The well-being room with the well-being assistant.
  - With any member of the pastoral team.
  - With any member of the executive safeguarding team.
  
2. The member of staff should then see a member of the executive safeguarding team to discuss the disclosure and next steps.
  
3. The following steps must also be taken as immediately as possible after the disclosure was received.
  - a. Record the disclosure CPOMS:
    - If the record of the disclosure has been handwritten, then scan it and upload it.
    - Or, write an account of the disclosure on CPOMS, making sure the disclosure is written as accurately as possible in the student's words.
    - Use the correct CPOMS tags to describe the nature of the disclosure.

**Any hand written disclosures must be treated in the strictest confidence. They must not be left on a desk or in public view. After scanning the paper records onto CPOMS they should be given to the safeguarding manager for filing.**

## 8.4 How safeguarding and child protection concerns are dealt with

- All concerns raised on CPOMS are monitored by the pastoral and safeguarding team throughout the school day. All new cases are allocated to an appropriate member of the executive safeguarding team to investigate. See appendix 3 for information about the role of each member of the safeguarding team in dealing with different types of child protection matters. We also have a child protection triage guidance document, which is available on request.
- There is a weekly executive safeguarding meeting, attended by all members of the executive safeguarding team, where new and ongoing child protection cases are discussed.
- Decisions to refer a student to an external agency are taken by the DSL in conjunction with other staff in the executive safeguarding team, who will assess the case and other relevant information about the student.
- If a member of staff is concerned that the DSL has not taken the relevant action relating to a case they have referred, they will speak to the headteacher. MASH will be called first for advice on 0208 379 5555, or the LADO depending on the nature of the concern.
- Child protection and early help referrals can be made by anyone in the community via the Enfield online portal.

### Early help referrals:

- Early help means providing support as early as possible to prevent problems escalating and causing distress. By doing so, outcomes for children, young people, families and vulnerable adults improve and statutory interventions are avoided.
- Enfield Early Help for All Strategy 2021-2025 and Enfield Children's Services - Threshold Guidance sets out the thresholds and criteria for early help referrals. Some examples of reasons to refer to early help are; children at risk of exclusion from school or excluded from school, housing and welfare issues, emotional and mental health issues, attendance concerns and family breakdown.
- If early help is appropriate, the DSL or one of the Deputy DSLs will lead on this and a member of the executive safeguarding team will oversee that the appropriate referrals are made. Staff may be required to support other agencies and professionals in an early help assessment.
- The DSL, with support of the Deputy DSL, will keep the case under 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.
- Referrals to early help are made through the Enfield portal <https://cp.studentssportal.enfield.gov.uk/web/portal/pages/home>.

### Child protection referrals:

- A child protection referral is made if the school is concerned that a child may have been harmed or is going to be harmed.
- The DSL and the Deputy DSLs will use the Enfield Children's Services - Threshold Guidance to make decisions about the most appropriate referrals to make. However, the school will always take the most cautious approach.
- 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. A member of the executive safeguarding will oversee all referrals under the direction of the DSL.
- If a member of staff makes a child protection referral directly to MASH they must tell the DSL as soon as possible.



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

## Section 9: Specific reporting procedures for FGM

### If a member of staff discovers that FGM has taken place:

- The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
- FGM is illegal in the UK and a form of student abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
- 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 2](#).
- **Any teacher who discovers 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.** The member of staff will also discuss the case with the DSL (who will involve children's social care as appropriate), and follow the schools safeguarding recording systems.
- 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. In such cases the teacher will follow the school's child protection procedures. Staff will not examine students for FGM under any circumstances.
- The DSL will complete a child protection referral for all known and suspected cases of FGM.

## Section 10: Specific reporting procedures for radicalisation concerns

- If the student is in immediate danger then staff will follow the reporting procedures in 8.1 of this policy. If the student is not in immediate danger then staff will follow the reporting procedures in 8.2 of this policy.
- Within 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.
- The school will then work with MASH to oversee a referral to Channel, if this is deemed to be necessary.
- 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.
- In an emergency, staff will call 999 or the confidential anti-terrorist hotline on 0800 789 321 if
  - someone is in immediate danger
  - someone may be planning to travel to join an extremist group
  - something that may be terrorist-related is heard or seen.

## Section 11: child on child abuse

### What is child on child abuse?

Children can abuse other children. This is generally referred to as child on child abuse and can take many forms. At Highlands School, we have a zero tolerance approach to child on child abuse. The non-recognition / downplaying the scale and scope of child on child abuse leads to a dangerous culture in the setting. Staff must be vigilant and, rather than waiting for a disclosure, recognise young people may not always make a direct report and that information may come from overheard conversations or observed behaviour changes.

Child on child abuse can include, but is not limited to

- bullying
- homophobia
- transphobia
- racism
- sexism
- cyber bullying
- sexual violence
- sexual harassment
- sexting
- causing someone to engage in sexual activity without consent
- upskirting
- emotional abuse
- grooming
- coercion
- initiations and rituals
- physical abuse
- abuse in intimate personal relationships between peers

### Section 11a: Child on child sexual violence and sexual harassment in schools

Sexual violence and sexual harassment are two forms of child on child abuse. KCSIE sets out specific guidance that schools will follow in these cases. The information in this section of our safeguarding policy reflects the guidance in KCSIE September 2023.

To be sexual harassment, the unwanted behaviour must have either:

- violated someone's dignity, whether it was intended or not.
- created an intimidating, hostile, degrading, humiliating or offensive environment for them, whether it was intended or not.
- We respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school premises, and or online.
- Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

- Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. All staff working with children are advised to maintain an attitude of 'it could happen here'.
- Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.
- Children who are victims of sexual violence and sexual harassment wherever it happens, will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.
- We are aware that safeguarding incidents and/or behaviours can be associated with factors outside the school, including intimate personal relationships.
- Whilst any report of sexual violence or sexual harassment will be taken seriously, staff will be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.
- It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report.
- Upskirting is where someone takes a picture under a person's clothing without their permission. It is now a specific criminal offence in England and Wales.
- child on child abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.
- We also recognise the gendered nature of child on child abuse and that students identified as vulnerable (e.g. SEN students) could be more at risk of child on child abuse. However, all child on child abuse is unacceptable and is taken seriously.
- We recognise that even if there are no reported cases of child on child abuse, such abuse may still be taking place and is not being reported. Staff are trained and expected to be vigilant to signs of child on child abuse.

### **School process for responding to child on child abuse cases.**

#### **The immediate response to a report**

Responding to the report:

- It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school staff may overhear a conversation that suggests a child has been harmed or a child's own behaviour might indicate that something is wrong. If staff have any concerns about a child's welfare, they will act on them immediately rather than wait to be told.
- The initial response to a report from a child is incredibly important. How we respond to a report can encourage or undermine the confidence of future victim of sexual violence and sexual harassment to report or come forward.
- It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward and that they will be supported and kept safe. Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report or their experience minimised.

- All staff are trained to manage a disclosure relating to child on child abuse (and any form of child protection issue). Effective safeguarding practice on sexual harassment and violence includes:
  - If possible, we manage reports with two members of staff present, (preferably one of them being the designated safeguarding lead or a deputy). However, this might not always be possible.
  - Where the report includes an online element, being aware of searching screening and confiscation advice (for schools) and ***UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people***. The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable. In some cases, it may be more appropriate to confiscate any devices to preserve any evidence and hand them to the police for inspection.
  - Not promising confidentiality at the initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps. Staff will only share the report with those people who are necessary in order to progress it. It is important that the victim understands what the next steps will be and who the report will be passed to.
  - Recognising that a child is likely to disclose to someone they trust: this could be anyone on the school or college staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust. They will be supportive and respectful of the child.
  - Recognising that an initial disclosure to a trusted adult may only be the first incident reported, rather than representative of a singular incident and that trauma can impact memory and so children may not be able to recall all details or timeline of abuse.
  - Keeping in mind that certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.
  - Listening carefully to the child, reflecting back, using the child's language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions will be avoided, staff can ask children if they have been harmed and what the nature of that harm was.
  - Considering the best way to make a record of the report. Best practice is to wait until the end of the report and immediately write up a thorough summary. This allows the staff member to devote their full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff will be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made.
  - Only recording the facts as the child presents them. The notes will not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation.
  - Informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
  - The staff member will upload the notes onto CPOMS.

### Risk assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) will make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment will be considered on a case-by-case basis. The risk and needs assessment will consider

- the victim, especially their protection and support

- whether there may have been other victims
- the alleged perpetrator(s); and
- all the other children, (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments will be recorded on the school's risk assessment template and uploaded to CPOMS. Risk assessments will be kept under review. At all times, the school or college will be actively considering the risks posed to all their pupils and students and put adequate measures in place to protect them and keep them safe.

The designated safeguarding lead (or a deputy) will ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments will be used to inform the school's approach to supporting and protecting our students and updating our own risk assessment.

### **Action following a report of sexual violence and/or sexual harassment**

#### **What to consider:**

- As set out above, sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of 'it could happen here'.
- The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's initial response. Important considerations will include:
  - The wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims will be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children.
  - The nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB (harmful sexual behaviour) has been displayed.
  - The ages of the children involved.
  - The developmental stages of the children involved.
  - Any power imbalance between the children. For example, is the alleged perpetrator(s) significantly older, more mature or more confident? Does the victim have a disability or learning difficulty?
  - If the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature).
  - That sexual violence and sexual harassment can take place within intimate personal relationships between peers.
  - Are there ongoing risks to the victim, other children, adult students or school or college staff; and, other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation .

As always when concerned about the welfare of a child, all staff will act in the best interests of the child. In all cases, we will follow general safeguarding principles as set out in the policy. Immediate consideration will be given as to how best to support and protect the victim and the alleged perpetrator(s) (and any other children involved/impacted).

The starting point regarding any report will always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

### **Options to manage the report:**

- We will consider every report on a case-by-case basis.
- When to inform the alleged perpetrator(s) will be a decision that will be carefully considered.
- When a report is going to be made to children’s social care and/or the police, then, as a general rule, the school will speak to the relevant agency and discuss next steps and how the alleged perpetrator(s) will be informed of the allegations. However, as per general safeguarding principles, this does not and will not stop the school taking immediate action to safeguard their children, where required.
- There are four likely scenarios to consider when managing any reports of sexual violence and/or sexual harassment. It will be important in all scenarios that decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt. It is particularly important to look out for potential patterns of concerning, problematic or inappropriate behaviour. Where a pattern is identified, the school will decide on a course of action.
- The decision and follow up actions will be logged on CPOMS.

Possible next steps.

#### **1. Manage internally:**

- In some cases of sexual harassment, for example, one-off incidents, the school may take the view that the children concerned are not in need of early help or that referrals need to be made to statutory services and that it would be appropriate to handle the incident internally, perhaps through utilising our behaviour policy and by providing pastoral support.
- Whatever the response, it will be underpinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions are recorded (written or electronic).

#### **2. Early help:**

- The school may decide that the children involved do not require referral to statutory services but may benefit from early help.
- Early help means providing support as soon as a problem emerges, at any point in a child’s life. Providing early help is more effective in promoting the welfare of children than reacting later. Early help can be particularly useful to address non-violent HSB and may prevent escalation of sexual violence. It is particularly important that the designated safeguarding lead (and their deputies) know what the Early Help process is and how and where to access support.
- More information on Early Help is set out in Part one of this guidance with full details of the early help process in Chapter one of Working Together to Safeguard Children.
- Multi-agency early help will work best when placed alongside strong school or college policies, preventative education and engagement with parents and carers.

### 3. Referrals to children's social care:

- Where a child has been harmed, is at risk of harm, or is in immediate danger, the school will make a referral to local children's social care.
- At the point of referral to children's social care, the school will generally inform parents or carers, unless there are compelling reasons not to (if informing a parent or carer is going to put the child at additional risk). Any such decision will be made with the support of children's social care.
- If a referral is made, children's social care will then make enquiries to determine whether any of the children involved are in need of protection or other services.
- Where statutory assessments are appropriate, the school (especially the designated safeguarding lead or a deputy) will be working alongside, and cooperating with, the relevant lead social worker. Collaborative working will help ensure the best possible package of coordinated support is implemented for the victim and, where appropriate, the alleged perpetrator(s) and any other children that require support.
- The school will not wait for the outcome (or even the start) of a children's social care investigation before protecting the victim and other children in the school. It will be important for the designated safeguarding lead (or a deputy) to work closely with children's social care (and other agencies as required) to ensure any actions the school takes do not jeopardise a statutory investigation. The risk assessment process will help inform any decision.
- Consideration of safeguarding the victim, alleged perpetrator(s), any other children directly involved in the safeguarding report and all children at the school or college will be immediate.
- In some cases, children's social care will review the evidence and decide a statutory intervention is not appropriate. The school (generally led by the designated safeguarding lead or a deputy) will be prepared to refer again if they believe the child remains in immediate danger or at risk of harm. If a statutory assessment is not appropriate, the designated safeguarding lead (or a deputy) will consider other support mechanisms such as early help, specialist support and pastoral support.
- Whatever the response, it will be under-pinned by the principle that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and will not be tolerated.
- All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

### 4. Reporting to the police:

- Any report to the police will generally be in parallel with a referral to children's social care (as above). The designated safeguarding lead (and their deputies) will be clear about the local process for referrals and follow that process.
- Where a report of rape, assault by penetration or sexual assault is made, the starting point is that this will be passed on to the police. Whilst the age of criminal responsibility is ten, if the alleged perpetrator(s) is under ten, the starting principle of reporting to the police remains. The police will take a welfare, rather than a criminal justice, approach. We will refer to following guidance to schools and to help decide when to engage the Police and what to expect of them when they do: [When to call the police.](#)
- Where a report has been made to the police, the school will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. The school will also discuss the best way to protect the victim and their anonymity.

- At this stage, the school will generally inform parents or carers unless there are compelling reasons not to, for example, if informing a parent or carer is likely to put a child at additional risk. In circumstances where parents or carers have not been informed, it will be especially important that the school is supporting the child in the decision we take. This will be with the support of children's social care and any appropriate specialist agencies.
- In some cases, it may become clear very quickly that the police (for whatever reason) will not take further action. In such circumstances, the school will continue to engage with specialist support for the victim and alleged perpetrator(s) as required.
- Whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s), the designated safeguarding lead (or a deputy) will work closely with the police (and other agencies as required), to ensure any actions the school or college take do not jeopardise the police investigation.
- All concerns, discussions, decisions and reasons for decisions will be recorded (written or electronic).

#### **The school will follow the guidance in KCSIE with regards to**

- considering bail conditions.
- managing any delays in the criminal process.
- the end of the criminal process.
- unsubstantiated, unfounded, false or malicious reports.
- ongoing response.

#### **Section 12: Concerns about mental health**

Schools have an important role to play in supporting the mental health and wellbeing of their pupils, by developing approaches tailored to the particular needs of their pupils. The culture, ethos and environment of the school can have a profound influence on both pupil and staff mental wellbeing. We create a calm and supportive school environment, which aims to promote positive mental health:

- All staff will be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
- The school will follow guidance set out in Promoting and supporting mental health and well-being in schools and colleges – June 2021.
- Only appropriately trained professionals will attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences can impact on their mental health, behaviour, and education.
- The school will work with parents/carers and external agencies to ensure that students with mental health have appropriate support. Depending on the severity of the mental health concern the school will do one or more of the following.



The DSL or a Deputy DSL will do one or more of the following;

- Meet with the parent/carer and student to discuss the mental health concerns.
- Refer the student to our school counsellor.
- Place the student on our vulnerable student list for monitoring.
- Allocate a key worker who will conduct mentoring sessions and welfare checks.
- Discuss the student with the SENCO.
- Seek advice from the school's educational psychology service.
- Refer the student for assessment by the educational psychologist.
- Create an IHP (individual health plan) for the student.
- Conduct a risk assessment for the student.
- Assign the student a welfare card.
- Give the student access to our well-being room.
- Seek advice from the Local Authority's mental health lead.
- Refer the student to CAMHS.
- Refer the student/family to Early Help.
- Make a child protection referral.

All staff are trained to recognise the signs of mental health concerns in young people so that early intervention can identify issues and provide effective support. The school's role in supporting and promoting mental health and wellbeing can be summarised as:

- **Prevention:** creating a safe and calm environment where mental health problems are less likely, improving the mental health and wellbeing of the whole school population, and equipping pupils to be resilient so that they can manage the normal stress of life effectively. This will include teaching pupils about mental wellbeing through the curriculum and reinforcing this teaching through school activities and our ethos.
- **Identification:** recognising emerging issues as early and accurately as possible.
- **Early support:** helping pupils to access evidence based early support and interventions.
- **Access to specialist support:** working effectively with external agencies to provide swift access or referrals to specialist support and treatment.

When schools suspect that a student is having mental health difficulties, we will ensure that support is put in place, using the graduated response process:

- An assessment to establish a clear analysis of the pupil's needs.
- A plan to set out how the pupil will be supported.
- Action to provide that support.
- Regular reviews to assess the effectiveness of the provision and lead to changes where necessary.

The support put in place will be written into an IHP (individual health plan) or a welfare support plan. Our medical conditions and first aid policy sets out the process for IHPs.

### **Suicide, attempted suicide and suicide prevention**

- The school has a separate suicide prevention strategy, which can be found in appendix 5 of this policy. This strategy includes:
  - Our process when we become aware that a student is feeling suicidal or has had suicidal feelings.

- Our process when a student has attempted suicide.
- Our process when a student has taken their own life (suicide).

### **Section 13: Notifying parents/carers of safeguarding concerns about their child:**

- Discussions with parents/carers about child protection concerns will be undertaken by a DSL or deputy DSL. This may be delegated to other members of the wider safeguarding team, but only after discussion and agreement with the DSL.
- If it is believed that notifying the parents/carers would have a negative impact on the student, the DSL will discuss this with the local authority children's social care team before doing so.
- In the case of allegations of abuse made against other students, we will normally notify the parents/parents of all the students involved (unless it is unsafe to do so).

### **Section 14: Students with special educational needs and disabilities**

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:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the student's disability without further exploration.
- Students being more prone to peer group isolation than other students.
- The potential for students with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs.
- Communication barriers and difficulties in overcoming these barriers. All students with an EHCP have a key worker who knows the student well.

### **Section 15: Students with a social worker:**

- 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.
- The DSL and all members of staff will work with and support social workers to help protect vulnerable students.
- When we know 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:
  - Responding to unauthorised absence or missing education where there are known safeguarding risks.
  - The provision of pastoral and/or academic support.

### **Section 16: Looked-after and previously looked-after children**

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

- appropriate staff have relevant information about students' looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- the DSL has details of students' social workers and relevant virtual school heads

- 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
- the designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role. As part of their role, the designated teacher will
  - work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after students are quickly and effectively responded to.
  - 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 17: Mobile phones and cameras**

- 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, e.g. 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.
- 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.
- 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 18: Whistleblowing and allegations against staff and volunteers**

Safeguarding concerns raised against staff will be handled in accordance with our procedures for dealing with allegations of abuse made against staff see Appendix 4. We have a separate whistle blowing policy and staff code of conduct, which can be read in full on our website.

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, staff must report this to the headteacher. In the absence of the headteacher, staff should speak to the DSL/deputy headteacher. If the concerns/allegations are about the headteacher, staff must report this to the chair of governors, Matt Miller:

- Safeguarding concerns against staff, made by another member of staff, should be made directly to the headteacher in writing. Staff may also see the headteacher in person to share their concerns, but all concerns must be communicated in writing.
- Safeguarding concerns against staff from a parent/carer or other member of the community can be made in one of the following ways:
  - By telephoning the school on 0208370 1100 to ask to speak to a member of the senior leadership team.
  - By writing to the headteacher at [postbox@highlands.enfield.sch.uk](mailto:postbox@highlands.enfield.sch.uk).

Keeping Children Safe in Education 2023 outlines two levels of allegation/concern against staff who work in schools.

1. Allegations that may meet the harm threshold.
2. Allegations/concerns that do not meet the harm threshold – referred to as ‘low level concerns’.

Highlands School promotes a culture of openness and all staff are encouraged to be vigilant and report any concerns about adults at our school, no matter how small or insignificant they appear to be. When the headteacher receives an allegation/concern they will consult the LADO to determine whether the allegation meets the harm threshold or whether the allegation can be treated as a low level concern. The headteacher will then follow the procedures set out in the school’s Staff Code of Conduct Policy, alongside guidance from the LADO, Chair of Governors and Enfield HR.

### **Allegations that may meet the harms threshold**

These are allegations that might indicate a person would pose a risk of harm if they continue to work in their present position, or in any capacity with children in a school or college.

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

### **Concerns that do not meet the harm threshold**

- Concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.
- The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the harm threshold.
- A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to
  - being over friendly with children
  - having favourites
  - taking photographs of children on their mobile phone
  - engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
  - using inappropriate sexualised, intimidating or offensive language.
- Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. It is crucial that any such concerns, including those which do not meet the harm threshold are shared with the headteacher in writing.

- We also encourage staff to be confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

## Section 19: Record-keeping

All child protection concerns, discussions, actions, decisions made and the reasons for those decisions, are recorded in writing on CPOMS. If a member of staff is in any doubt about whether to record something, they will discuss it with the DSL:

- All safeguarding and welfare concerns about students, and the actions taken, are recorded on CPOMS.
- 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 safeguarding manager'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 also be scanned and uploaded to the student's CPOMS file.
- Safeguarding records relating to individual students will be retained for a reasonable period of time and until they are 25 years of age.
- 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.
- We record all referrals made to external agencies and we log all subsequent follows and outcomes.
- We keep a list of all vulnerable students and their allocated keyworker.
- We keep records of all cases of bullying and sexual harassment and sexual violence .
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff.

## Section 20: Safeguarding training for staff

All staff:

- All staff members who are employed by the school will undertake safeguarding and child protection training annually as part of the school's INSET programme. The training will consist of the components listed below. Staff employed by the school's PFI company but who work on the school site on a daily basis will also participate in all safeguarding training.
- Training sessions for all staff led by the DSL covering
  - members of the safeguarding team
  - changes to KCSIE
  - a summary of the school's safeguarding policy and any changes to the policy
  - types of child abuse
  - safeguarding issues
  - recognising the signs/identifying abuse
  - procedures for reporting child protection concerns
  - whistle blowing procedures
  - staff conduct in relation to safeguarding
  - specific reference to FGM, mental health, online safety, child on child abuse and sexual violence.

- All staff are required to read KCSIE part 1, and the school's safeguarding policy. Staff will be required to complete a quiz and submit a declaration form to confirm they have read and understood these two documents.

In addition to the above safeguarding training, each year the school will also require all staff to attend training sessions on specific safeguarding issues in response to our school context and concerns that may arise throughout the school year.

**Staff who join the school at points in the school year other than the start of the autumn term, will complete all of the above training. This will be coordinated by the HR officer.**

#### **Safeguarding training for the DSL and deputy DSL (the executive safeguarding team)**

The DSL and deputy DSLs will undertake the following training, in addition to the training for all staff:

- Level 3 DSL training at least every 2 years.
- Mental Health First Aid certificate.
- Other relevant training eg: suicide prevention training.

#### **Safeguarding training for the safeguarding support team (heads of year and behaviour mentors):**

- Level 3 DSL training at least every two years.
- Mental Health First Aid certificate.

#### **Safeguarding training for early career teachers:**

- In addition to the safeguarding training delivered to all staff, early careers teachers will have additional safeguarding sessions built into the early carer training programme.

#### **Safeguarding training for contractors**

- Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive details of the school's executive safeguarding team upon arrival and take part in the site onboarding process with the PFI provider.
- Volunteers will receive appropriate training, if applicable, and be informed of details of the school's executive safeguarding team.

#### **Safeguarding training for supply and agency staff:**

- Daily supply teachers employed via agencies will, upon arrival at the school, receive a copy of our safeguarding information leaflet for visitors and supply staff.
- They will be required to sign a log to confirm that they have read this information leaflet.
- It is the responsibility of the agency to provide general safeguarding training before sending teachers into schools. We work with all supply agencies to ensure that we receive vetting and DBS information for all supply staff.
- Staff employed via an agency on a fixed term agreement, will be required to undertake the same safeguarding training as staff employed by the school. This is coordinated by the HR officer.

**Governors:**

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

**Safer recruitment training:**

- 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.

**Supervision for the staff in the safeguarding team:**

- 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 21: Stay safe curriculum (safeguarding curriculum)**

Education forms a crucial part in our safeguarding provision at Highlands School. Our high quality Stay Safe Curriculum teaches young people how to keep themselves and others safe and healthy. Our Stay Safe Curriculum is delivered by a range of staff, depending on the topic, who are all trained to deliver sensitive topics.

**Our Stay Safe Curriculum is focussed on three themes:**

- Health and well-being.
- Relationships.
- Living in the wider world.

**Our Stay Safe Curriculum is based on three principles that run through each of the above themes:**

- We all have the right to be safe and respected.
- We are able to recognise dangerous and unsafe situations and people.
- We can help ourselves by talking to a trusted adult and know where to obtain support on specific issues.

**Our Stay Safe Curriculum is delivered in the following ways:**

- Weekly assemblies (led by heads of year and SLT).
- A sixty-five minute PSHE lesson per week (taught by form tutors).
- A relationships and sex education programme (taught by specialist teachers) delivered during PSHE in Y9-12 and during citizenship lessons in years 7-8.
- Special feature newsletters.

Appendix 6 outlines the topics within our stay safe curriculum.

## Section 22: Monitoring arrangements

### We monitor child protection concerns through

The safeguarding team monitors CPOMS throughout the day, ensuring all new entries are actioned:

- The executive safeguarding teams meet on a weekly basis to review all child protection cases and review the action taken or action that needs to be taken.
- The DSL and Deputy DSLs regularly review the CPOMS files for students on child protection and child in need plans.
- The safeguarding manager keeps a tracking document of all referrals to external agencies and these are reviewed on a regular basis with the DSL.
- We keep a tracking document of all cases of child on child abuse, sexual harassment and sexual violence and discriminatory incidents.

The DSL submits a termly safeguarding report to the governing body:

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

## Section 23: Students educated at alternate provisions

We carry out the actions below for students who are dual registered and attending an alternate provision/new school.

- The attendance officer checks daily attendance.
- A member of the year team makes regular calls home to check how the child is doing.
- A weekly check in email with the named person at the alternate provision/new school to find out how the student is doing.
- Visits to the student at the alternate provision/new school.

## Section 24: Handling incidents involving indecent images of children

We have a duty and obligation to respond swiftly and confidently should an incident of indecent image-sharing come to light, to make sure children and young people are safeguarded, supported and educated.

Incidents can broadly be divided into two categories:

- 1) **Aggravated:** incidents involving additional or abusive elements beyond the creation, sending or possession of nudes and semi-nudes. These can further be sub-categorised into:
  - adult involved: adult offenders attempt to develop relationships by grooming children and young people, in criminal sex offences even without the added element of nudes and semi-nudes. Victims may be family friends, relatives, community members or contacted via the Internet. The images may be solicited by adult offenders.
  - youth only – intent to harm: these cases can arise from interpersonal conflict, such as break-ups and fights among friends, or criminal/abusive conduct such as blackmail, threats or deception, sexual abuse or exploitation by young people.



- youth only – reckless misuse: no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result.
- 2) **Experimental:** incidents involving the creation and sending of nudes and semi-nudes with no adult involvement, no apparent intent to harm or reckless misuse. These can further be subcategorised into:
- romantic: incidents in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair
  - ‘sexual attention seeking’: the phrase ‘sexual attention seeking’ is taken directly from the typology however it is important to note that incidents within this category can be a part of normal childhood. A child or young person should not be blamed for taking and sharing their image.
  - other: cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves, for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

**When an incident involving nudes and semi-nudes comes to the attention of any member of staff:**

- the incident should be referred to the DSL as soon as possible
- the DSL will hold an initial review meeting with appropriate staff
- the children or young people involved will be interviewed (if appropriate)
- parents and carers will be informed at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm
- if there is a concern that a child or young person has been harmed or is at risk of immediate harm at any point in the process a referral will be made to children’s social care and/or the police.

**The initial review meeting will consider the initial evidence and aim to establish:**

- whether there is an immediate risk to any child or young person
- if a referral should be made to the police and/or children’s social care
- what further information is required to decide on the best response
- whether the image(s) has been shared widely and via what services and/or platforms. This may be unknown
- whether immediate action should be taken to delete or remove images or videos from devices or online services
- any relevant facts about the children or young people involved which would influence risk assessment
- if there is a need to contact another education, setting or individual
- whether to contact parents or carers of the children or young people involved - in most cases they should be involved.

**Searching devices, viewing and deleting nudes and semi-nudes**

Staff and parents or carers must not intentionally view any nudes and semi-nudes unless there is good and clear reason to do so as outlined below. Wherever possible, responses to incidents should be based on what the DSL has been told about the content of the imagery.

The DSL will only make the decision to view the imagery if they can be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved

- is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network

If it is necessary to view the imagery then the DSL will:

- never copy, print, share, store or save them; this is illegal.
- discuss the decision with the headteacher.
- make sure viewing is undertaken by the DSL with delegated authority from the headteacher.
- make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the executive safeguarding team. This staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher's office.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- record how and why the decision was made to view the imagery in the safeguarding records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions, ensuring this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.

If any devices need to be taken and passed onto the police, the device(s) will be confiscated and the police will be called. The device will be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device will be placed in a secure place until the police are able to come and collect it.

#### **Deletion of imagery**

If the school has decided that other agencies do not need to be involved, then consideration will be given to deleting nudes and semi-nudes from devices and online services to limit any further sharing.

In most cases, children and young people will be asked to delete the imagery and to confirm that they have deleted them. Parents or carers will be included in any discussion related to the deletion of imagery

## 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: Specific safeguarding issues**

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

### **2.1 Child abduction**

The unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

### **2.2 Community safety incidents**

People loitering near a school or unknown adults engaging children in conversation.

### **2.3 Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11-year olds and 12-17 year olds.

### **2.4 Children missing from education**

All staff will be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation, 'honour'-based abuse or risk of forced marriage. Early intervention is necessary to identify the existence of any

underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff will be aware of the school's unauthorised absence and children missing from education procedures.

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.

## **2.5 Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The National Information Centre on Children of Offenders, NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

## **2.6 Child criminal exploitation (CCE) and child sexual exploitation (CSE)**

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim. Children who have been exploited will need additional support to help maintain them in education. CSE can be a one-off occurrence or a series of

incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence. Child sexual exploitation - Information for practitioner, provides further information.

Some of the following can be indicators of both child criminal and sexual exploitation where children

- appear with unexplained gifts, money or new possessions
- associate with other children involved in exploitation
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late; and
- regularly miss school or education or do not take part in education.

Some additional specific indicators that may be present in CSE are children who

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

## 2.7 County lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of “deal line”. This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children’s homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who

- go missing and are subsequently found in areas away from their home
- have been the victim or perpetrator of serious violence (e.g. knife crime)
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs
- are exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection
- are found in accommodation that they have no connection with, often called a ‘trap house or cuckooing’ or hotel room where there is drug activity
- owe a ‘debt bond’ to their exploiters
- have their bank accounts used to facilitate drug dealing.

## 2.8 Modern slavery and the National Referral Mechanism

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs.

Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. [Modern slavery how to identify and support victims - GOV. UK \(www.gov.uk\)](#)

## 2.9 Cybercrime

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources; and
- making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), will consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests.

Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), ['NPCC - When to call the Police'](#) and [National Cyber Security Centre - NCSC.GOV.UK](#)

## 2.10 Domestic abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be "personally connected" (as defined in section 2 of the 2021 Act).

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socioeconomic status, sexuality or background and domestic abuse can take place inside or outside of the home.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as 'teenage relationship abuse'. Depending on the age of the young people, this may not be recognised in law under the statutory definition of 'domestic abuse' (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures will be followed and both young victims and young perpetrators will be offered support.

### **Operation Encompass**

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools will make a referral to children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse. The helpline is available 8AM to 1PM, Monday to Friday on 0204 513 9990.

### **National Domestic Abuse Helpline Refuge**

Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247. Its website provides guidance and support for potential victims, as well as those who are worried about friends and loved ones. It also has a form through which a safe time from the team for a call can be booked. Additional advice on identifying children who are affected by domestic abuse and how they can be helped is available at:

- [NSPCC- UK domestic-abuse Signs Symptoms Effects.](#)
- [Refuge what is domestic violence/effects of domestic violence on children.](#)
- [Safelives: young people and domestic abuse.](#)
- [Domestic abuse: specialist sources of support](#) - GOV.UK (www.gov.uk) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse).
- [Home : Operation Encompass](#) (includes information for schools on the impact of domestic abuse on children)



## 2.11 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) will be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority will be progressed as appropriate, and in accordance with local procedures, this does not, and will not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The following Homelessness Reduction Act [factsheets](#) usefully summarise the new duties: The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis. In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it will also be recognised in some cases that 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's social care will be the lead agency for these children and the designated safeguarding lead (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. The Department for Levelling Up, Housing and Communities have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

## 2.12 Mental health

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

More information can be found in the [Mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote 147 positive health, wellbeing and resilience among children. See [Every Mind Matters](#) for links to all materials and lesson plans.

## 2.13 Serious violence

There are a number of indicators, which may signal children are at risk from, or are involved with, serious violent crime. These may include:

- increased absence from school
- a change in friendships or relationships with older individuals or groups
- a significant decline in performance
- signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries

- Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

The likelihood of involvement in serious violence may be increased by factors such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Professionals should also be aware that violence can often peak in the hours just before or just after school, when pupils are travelling to and from school. These times can be particularly risky for young people involved in serious violence.

The Police, Crime, Sentencing and Courts Act will introduce early in 2023 a new duty on a range of specified authorities, such as the police, local government, youth offending teams, health and probation services, to work collaboratively, share data and information, and put in place plans to prevent and reduce serious violence within their local communities. Educational authorities and prisons/youth custody authorities will be under a separate duty to co-operate with core duty holders when asked, and there will be a requirement for the partnership to consult with all such institutions in their area.

The Duty is not intended to replace or duplicate existing safeguarding duties. Local partners may choose to meet the requirements of the Duty through existing multi-agency structures, such as multi-agency safeguarding arrangements, providing the correct set of partners are involved.

## **2.14 So-called ‘honour’-based abuse (including Female Genital Mutilation and forced marriage)**

So-called ‘honour’-based abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and will be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions:

- If staff have a concern regarding a child who might be at risk of HBA or who has suffered from HBA, they will speak to the designated safeguarding lead (or deputy).
- As appropriate, the designated safeguarding lead (or deputy) will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children’s social care.
- Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

## **FGM**

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

**FGM mandatory reporting duty for teachers Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions.** It will be rare for teachers to see visual evidence, and they will not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#).

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they will still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: FGM Fact Sheet. Further information can be found in the [Multi-agency statutory guidance on female genital mutilation](#) and [the FGM resource pack](#) particularly section 13.

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 behaviour
- being reluctant to undergo any medical examinations
- asking for help, but not being explicit about the problem
- talking about pain or discomfort between her legs.

Potential signs that a 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
- 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 a 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 a marriage is a crime in England and Wales. 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. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit (FMU) has created: Multi-agency practice guidelines: handling cases of forced marriage (pages 75-80 of which focus on the role of schools and colleges) and, Multi-agency statutory guidance for dealing with forced marriage, which can both be found at [The right to choose: government guidance on forced marriage - GOV.UK](https://www.gov.uk/government/guidance/the-right-to-choose-government-guidance-on-forced-marriage) (www.gov.uk) School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmu@fcdo.gov.uk](mailto:fmu@fcdo.gov.uk).

## 2.15 Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk will be a part of a schools’ or colleges’ safeguarding approach:

- **Extremism** - is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- **Radicalisation** - refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- **Terrorism** - is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat **must** be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Although there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology, there are possible indicators that should be taken into consideration alongside other factors and contexts. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The school's or college's designated safeguarding lead (and any deputies) will be aware of local procedures for making a Prevent referral.

### **The Prevent duty**

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. As defined in the Revised Prevent Duty Guidance for England and Wales.

The Prevent duty will be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders in schools will familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

### **Channel**

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. The designated safeguarding lead will consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse or those who are currently receiving support through the 'Channel' programme, and have that support in place for when the child arrives.

Statutory guidance on Channel is available at: Channel guidance.

## 2.16 Child on child abuse

Children can abuse other children (often referred to as child on child abuse) and it can take many forms. It can happen both inside and outside of school/college and online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports. This can include (but is not limited to): bullying (including cyberbullying, prejudice-based and discriminatory bullying); abuse within intimate partner relationships; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexual violence and sexual harassment; consensual and non-consensual sharing of nudes and semi-nudes images and/or videos; causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party; upskirting and initiation/hazing type violence and rituals. Addressing inappropriate behaviour (even if it appears to be relatively innocuous) can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future.

## 2.17 Sexual violence and sexual harassment between children in schools and colleges

Sexual violence and sexual harassment can occur between two children of any age and sex from primary to secondary stage and into colleges. It can also occur online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school or college. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and face to face (both physically and verbally) and are never acceptable.

It is essential that **all** victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. Staff will be aware that some groups are potentially more at risk. Evidence shows girls, children with special educational needs and disabilities (SEND) and LGBT children are at greater risk.

### **Staff will be aware of the importance of**

- challenging inappropriate behaviours.
- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## What is sexual violence and sexual harassment?

### Sexual violence

It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way and that it can happen both inside and outside of school/college. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003/135 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (Schools will be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent, or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

**Causing someone to engage in sexual activity without consent:** A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (This could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

### What is consent?

Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom.

Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

Further information about consent can be found here: [Rape Crisis England & Wales](#)

### Sexual consent:

- A child under the age of 13 can never consent to any sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.

## Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names.
- sexual “jokes” or taunting.
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes (schools and colleges will be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - consensual and non-consensual sharing of nudes and semi-nudes images and/or videos. As set out in [UKCIS Sharing nudes and semi-nudes: advice for education settings working with children and young people](#) (which provides detailed advice for schools and colleges) taking and sharing nude photographs of U18s is a criminal offence
  - sharing of unwanted explicit content.
  - upskirting (is a criminal offence 141).
  - sexualised online bullying.
  - unwanted sexual comments and messages, including, on social media.
  - sexual exploitation; coercion and threats.

## Upskirting

The Voyeurism (Offences) Act 2019, which is commonly known as the Upskirting Act, came into force on 12 April 2019. ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any sex, can be a victim.

The response to a report of sexual violence or sexual harassment The initial response to a report from a child is incredibly important. How the school or college responds to a report can encourage or undermine the confidence of future victims of sexual violence and sexual harassment to report or come forward. Schools and colleges not recognising, acknowledging or understanding the scale of harassment and abuse and/or downplaying of some behaviours can actually lead to a culture of unacceptable behaviour. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim will never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will a victim ever be made to feel ashamed for making a report. If staff have a concern about a child or a child makes a report to them, they will follow the referral process as set out from paragraph 55 in Part one of this guidance. As is always the case, if staff are in any doubt as to what to do they will speak to the designated safeguarding lead (or a deputy).

P139-141 of KCSIE September 2021 edition provides a list of support documents and toolkits for school staff to support young people with sexual violence and sexual harassment.



### Appendix 3: Executive safeguarding team roles and responsibilities in relation to child protection referrals

Safeguarding roles and responsibilities	
<b>Designated safeguarding lead</b>	Responsible for safeguarding across the entire school,, oversees all extreme risk child protection cases, chairs executive safeguarding weekly meetings.
<b>Deputy designated safeguarding leads who are also SLT</b>	Oversees safeguarding for the year groups they line manage. Lead on high risk child protection cases. Supports DSL with extreme risk cases. Monitors CPOMS for the year groups they line manage. Attends CIN and PC review meetings. Makes decisions about referrals to external agencies for the year groups they line manage.
<b>Safeguarding manager - deputy designated safeguarding lead</b>	First point of contact for all external agencies, coordinates all meetings with external agencies, referrals to external agencies monitors CPOMS during the day, maintains the external agencies referrals log, maintains the VP/key worker list, supports with daily safeguarding cases where required, key worker caseload of students disengaged with school, attends executive safeguarding weekly meetings. Leads the daily child protection on call system.
<b>Inclusion officer - deputy designated safeguarding lead</b>	Responsible for supporting all LAC students on a daily basis along with weekly/fortnightly mentoring sessions, attends all LAC PEP meetings and reviews and ensures that school based actions are followed up, supports with referrals to external agencies, monitors CPOMS during the day, maintains all LAC files and documentation. Supports daily safeguarding cases where required, attends executive safeguarding weekly meetings. Leads the daily child protection on call system.
<b>Welfare officer</b>	Responsible for all IHPs (individual health plans) (previously known as care plans), regular review and updating IHPs, maintaining the medical list, first point of call for first aid and student illness, responsible for the medical room and all medicines, key worker to caseload of students. Supports daily safeguarding cases where required, attends executive safeguarding weekly meetings.
<b>School counsellor</b>	Operates a caseload of students requiring therapeutic support, liaises with CAMHS and parents, attends executive safeguarding weekly meetings. Supports daily safeguarding cases where required.
<b>Heads of year</b>	Responsible for the child protection g and welfare of their year group, deals with all medium risk child protection/welfare cases, monitors CPOMS for their year group and ensures all matters are actioned/resolved at the end of each day. Refers any concerns to the DSL or an AHT Deputy DSL.
<b>Behaviour mentors</b>	Monitors CPOMS for their year group throughout the day, responds to low risk child protection and welfare issues, and alerts the HoY to medium risk cases and DSL or senior leader Deputy DSL to high or extreme risk cases.

## Appendix 4: Allegations of abuse made against staff

When the headteacher receives an allegation against a member of staff, this will be discussed with the LADO to establish whether the case meets the harm threshold or is a low level concern. In some cases it will be clear to the head teacher that concern is low level. The headteacher will keep a record of all allegations against staff, the type of concern, actions taken and the outcome.

### Process for responding to concerns and allegations that do not meet the harm threshold

For all low level concerns, the headteacher will appoint a suitably qualified member of the senior team to investigate the matter.

### Responding to a low level concern

- The member of the senior leadership team investigating the low level concern will interview the person who made the allegation.
- If appropriate, other students involved or were witnesses will also be interviewed.
- Relevant parents will be informed.
- The member of SLT leading the investigation will then interview the individual about whom the low level concern has been raised, unless this is deemed to be inappropriate or the LADO advises against it).
- The member of SLT leading the investigation will share the findings with the headteacher and decide the next steps. The headteacher will be able to take into consideration any previous concerns raised about the member of staff, allowing the headteacher to decide whether this now meets the harm threshold.
- The headteacher will decide on an appropriate outcome.

### Possible outcomes of a low level concern

- If it is decided that the behaviour is consistent with the school's staff code of conduct, the headteacher or appointed member of SLT will:
  - update the individual in question
  - speak to the person who shared the concern to explain why the behaviour is consistent with the school's code of conduct.
  - consider whether further training is required for staff to clarify the staff code of conduct.
- If it is decided that the behaviour constitutes a low level concern:
  - The response will be carried out in a sensitive and proportionate manner, while maintaining confidence that such concerns will be handled promptly and effectively when raised.
  - The investigation will be carried out discreetly and on a need-to-know basis.
  - The headteacher or appointed member of SLT will explain to the individual why their behaviour is concerning, problematic or inappropriate. It will also be made clear what change in behaviour is required. The headteacher or member of SLT will arrange training for the individual if appropriate in order to change the behaviour.
  - Where a low level concern relates to a person employed by a supply agency or a contractor, that concern will be raised with their employers, so that any potential patterns of inappropriate behaviour can be identified.
  - Some low level concerns may raise issues of misconduct or poor performance. If this is the case the headteacher will consider whether to follow the school's disciplinary / capability procedures.

- If, when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, then it should be referred to the LADO in accordance with Part 4 of KCSIE.

### **Storing and use of low-level concerns**

The staff member(s) reporting the concern must keep the information confidential and not share the concern with others apart from the Head Teacher or those aware in the senior leadership team.

Low-Level Concerns will not be referred to in references unless they have been formalised into more significant concerns resulting in disciplinary or misconduct procedures.

### **Process for responding to concerns and allegations that meet the harm threshold**

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:

- Immediately discuss the allegation with the local authority designated officer (LADO) 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 will be put in writing to the individual and by whom, as well as what action will 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 cares 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, this will be required at a later point.

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

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome.
- The 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 will be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a student.

## 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 were 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 5: Responding to students who feel suicidal

Our full suicide prevention strategy can be requested by contacting the DSL.

When a student has disclosed (or it has been noticed) that they are feeling suicidal they will be referred to a member of the executive safeguarding team, who will carry out the process outlined below. This will all be done as soon as possible after the suicidal feelings have been disclosed/noticed.

### Step 1 - The initial conversation

**Purpose** - to establish whether the student is feeling suicidal

**Process** - the member of staff takes the student to a quiet place and initiates a conversation using the suicide conversation tool. Where possible the student will be given a choice of who in the safeguarding team to speak to.

The member of staff who has this initial conversation will be responsible for the case until step 4

### Step 2 - outcome of the initial conversation

For any student who states they are planning to commit suicide MASH and the CAMHS crisis line should be called immediately for further guidance. It is likely that one of these three options will be recommended.

#### Hospital

**Option A**- the student expresses the desire to act on suicidal feelings immediately and can describe specifically how they will do this, then the following steps will be taken to ensure the child receives immediate medical attention.

- Contact the Crisis helpline for guidance.
- Parents to be contacted
- Student taken to A&E by parents or an ambulance called to school if appropriate.
- Contact the student's CAMHS therapist if they have one, to inform them of the incident
- Make a referral to MASH

#### The safety plan

**Option B** - the student expresses suicidal feelings, but says they do not plan to act on this any time soon. In these cases a suicide safety plan is the next step. In some cases the extent of the student's suicidal feelings may not be apparent until a full suicide safety plan has been conducted.

**Purpose** - to help the student establish their connections to life.

**Process** - the safety plan will follow on from the initial conversation if the student confirms that they are feeling suicidal. The safety plan is not the same as a risk assessment, but does form part of the process to assess the extent of the suicidal feelings, the safety plan is completed and owned by the student and not the member of staff. The member of staff supports the student to complete the safety plan. A copy is made of the safety plan and put on CPOMS. The student keeps the original.



<b>Step 3 -Short term action</b>	
<ul style="list-style-type: none"> <li>Follow up phone call home that evening to see how the student is and to find out what happened at hospital</li> <li>Arrange a meeting with the parent to support the student's return to school if they are well enough, or to agree a date to review the return to school.</li> </ul>	<ul style="list-style-type: none"> <li>Parents called to discuss the next steps.</li> <li>CAMHS therapist, if the student has one, is contacted to discuss next steps.</li> <li>CAMHS support line called for advice and guidance.</li> </ul> <p><b>Option A - hospital</b> - if the safety plan process indicates that the student cannot establish a connection to life, then the CAMHS crisis line should be contacted for guidance.</p> <p><b>Option B - home</b> - the parent is called to take the student home if the student feels that they cannot manage in school for the rest of the day, or if there is an identified risk in keeping the student in school..</p> <p><b>Option C - back to lessons</b> - the student feels well enough to go back to lessons. The parent collects the student at the end of the day or at an agreed time.</p> <p><b>Option D - another safe place in school</b> - space in school until the student is collected or can go back to lessons. The parent collects the student at the end of the day or at an agreed time.</p>

<b>Step 4 - Medium to long term action</b>		
The member of staff who completed steps 1 - 3, will also ensure that the following strategies are put in place.		
	<b>Action</b>	<b>Process</b>
<b>Meetings</b>	<b>Meeting with parents 1</b>	<ul style="list-style-type: none"> <li>A meeting/conversation with parents will be arranged by the school to discuss the student's suicide safety plan. This must take place on the day of the event to ensure the student is safe when they leave school.</li> </ul>
	<b>Meeting with parents 2</b>	<ul style="list-style-type: none"> <li>A meeting with parents will be arranged by the school to establish a support programme.</li> <li>This will take place as soon as the student is ready to return to school after feeling suicidal.</li> </ul>
	<b>Professionals meeting</b>	<ul style="list-style-type: none"> <li>A meeting with relevant professional (internal and external) to be arranged to share support strategies and relevant information.</li> </ul>

<b>Referrals to external agencies</b>	<b>Contact with external agencies</b>	<ul style="list-style-type: none"> <li>Any external agencies that the student is involved with will be informed in writing.</li> <li>Letter sent to the child's GP.</li> </ul>
	<b>CAMHS referral</b>	<ul style="list-style-type: none"> <li>All students who express suicidal feelings are referred to CAMHS.</li> </ul>
	<b>Child protection referral</b>	<ul style="list-style-type: none"> <li>We will do a child protection referral for students who we refer to hospital or whose safety plan indicates that they are at risk of suicide.</li> </ul>
	<b>Other referrals</b>	<ul style="list-style-type: none"> <li>Educational psychologist.</li> <li>Early help.</li> </ul>
<b>In house wellbeing support</b>	<b>Counselling</b>	<ul style="list-style-type: none"> <li>All students who feel suicidal will be offered emergency/short term/long term counselling with our school counsellor, while they are awaiting a response from CAMHS.</li> </ul>
	<b>Key worker allocation and welfare checks</b>	<ul style="list-style-type: none"> <li>If the student does not already have a key worker, they will be assigned one.</li> <li>Frequency of welfare checks agreed and written into the IHP.</li> <li>Weekly mentoring sessions or more frequently if needed.</li> </ul>
	<b>Welfare card</b>	<ul style="list-style-type: none"> <li>A student who feels suicidal will be given a welfare card and explained how to use it.</li> </ul>
<b>Written plans</b>	<b>Individual health plan</b>	<ul style="list-style-type: none"> <li>Parents and the student meet with the member of staff supporting the student, to put together an individual health plan, which will bring together all the support strategies for the student.</li> <li>This will be shared with all relevant staff.</li> </ul>
	<b>Risk assessment</b>	<ul style="list-style-type: none"> <li>A risk assessment will be put in place to identify the risks and triggers and how as school we will minimise the risks.</li> <li>This will be shared with all relevant staff.</li> </ul>
	<b>Safety plan</b>	<ul style="list-style-type: none"> <li>The child's safety plan is to be reviewed at regular intervals with the key worker or case handler.</li> </ul>
<b>Accountability</b>	<b>Case review</b>	<ul style="list-style-type: none"> <li>Once all the above is in place, a member of staff is allocated to oversee the long term support. This could be a member of the safeguarding executive team or a member of the wider pastoral team. The DSL will make this decision.</li> <li>Allocated member of staff to establish review points for this case.</li> </ul>

## Appendix 6: Stay safe curriculum map

General stay safe information		
<p>What is safeguarding and child protection?            Students' rights to being and feeling safe            How we keep students safe at Highlands School            Who are the safeguarding team and how to report a concern</p>		
Health and well-being	Relationships	Living in the wider world
<ul style="list-style-type: none"> <li>● Transition to secondary school</li> <li>● Puberty and the changing adolescent body</li> <li>● Menstruation</li> <li>● Personal hygiene</li> <li>● Self care - visiting the doctor and dentist</li> <li>● Illegal and prescription drugs</li> <li>● Mental ill health</li> <li>● Mental well-being</li> <li>● Physical health - cancer awareness and self checking</li> <li>● Healthy lifestyles - eating</li> <li>● Healthy lifestyles - exercise</li> <li>● Drugs; prescription and illegal</li> <li>● Safety and the home</li> <li>● Using emergency services</li> </ul>	<ul style="list-style-type: none"> <li>● Healthy friendships (bullying)</li> <li>● Healthy romantic relationships and consent</li> <li>● Consent and the law</li> <li>● Delaying sexual activity</li> <li>● Abusive relationships</li> <li>● Peer pressure</li> <li>● Sexual health; sexually transmitted infections and contraception</li> <li>● Parenthood</li> <li>● Pregnancy and fertility</li> <li>● Committed relationships</li> <li>● Managing relationship breakup</li> <li>● Unplanned pregnancy; abortion and adoption</li> <li>● child on child abuse (harmful sexual behaviours)</li> <li>● Sexual harassment</li> <li>● Online safety; grooming, sharing of indecent images</li> </ul>	<ul style="list-style-type: none"> <li>● Equal opportunities and diversity</li> <li>● LGBTQ+ plus inclusion</li> <li>● Disability inclusion</li> <li>● Racial inclusion</li> <li>● Gender inclusion</li> <li>● County lines</li> <li>● Gangs and knife crime</li> <li>● Street crime/safety on the streets</li> <li>● Careers, progression and next steps</li> <li>● Employment rights and responsibilities</li> <li>● Financial planning</li> <li>● Gambling</li> <li>● Extremism and radicalisation</li> <li>● Staying safe while travelling abroad</li> </ul>

## Appendix 7: Role of the designated safeguarding lead

Governing bodies and proprietors will ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead.

The designated safeguarding lead will take lead responsibility for safeguarding and child protection (including online safety). This will be explicit in the role holder's job description. This person will have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they will be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and interagency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

Deputy designated safeguarding leads is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies will be trained to the same standard as the designated safeguarding lead and the role will be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility will not be delegated. Availability during term time the designated safeguarding lead (or a deputy) will always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and the designated safeguarding lead to provide adequate and appropriate cover arrangements for any out of hours/out of term activities.

### Manage referrals

The designated safeguarding lead is expected to refer cases

- of suspected abuse and neglect to the local authority children's social care as required and support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- where a crime may have been committed to the Police as required. NPCC - When to call the police will help understand when to consider calling the police and what to expect when working with the police.

### Working with others

The designated safeguarding lead is expected to

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member

- liaise with staff (especially teachers, pastoral support staff, school nurses, IT Technicians, senior mental health leads and special educational needs coordinators (SENCOs), or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding and welfare (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school or college<sup>144</sup>. This includes:
  - ensure that the school or college knows who its cohort of children who have or have had a social worker are, understanding their academic progress and attainment, and maintaining a culture of high aspirations for this cohort; and
  - support teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes
- Information sharing and managing the child protection file
  - The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information will be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child. Records will include:
    - a clear and comprehensive summary of the concern
    - details of how the concern was followed up and resolved
    - a note of any action taken, decisions reached and the outcome.

They will ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of this guidance.

When children leave the school or college (including in year transfers) the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This will be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt will be obtained. Receiving schools and colleges will ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead will also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

## Raising awareness

The designated safeguarding lead will

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements; and
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children who have or have had a social worker are experiencing with teachers and school and college leadership staff.

## Training, knowledge and skills

The designated safeguarding lead (and any deputies) will undergo training to provide them with the knowledge and skills required to carry out the role. This training will be updated at least every two years. The designated safeguarding lead will undertake Prevent awareness training. Training will provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they

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

In addition to the formal training set out above, their knowledge and skills will be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

**Providing support to staff:**

- Training will support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters. This includes specifically to
- ensure that staff are supported during the referrals processes; and
- support staff to consider how safeguarding, welfare and educational outcomes are linked, including to inform the provision of academic and pastoral support.

**Understanding the views of children:**

- It is important that children feel heard and understood. Therefore, designated safeguarding leads will be supported in developing knowledge and skills to
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them; and understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

**Holding and sharing information**

The designated safeguarding lead will be equipped to

- understand the importance of information sharing, both within the school and college, and with other schools and colleges on transfer including in-year and between primary and secondary education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR); and
- be able to keep detailed, accurate, secure written records of concerns and referrals and understand the purpose of this record-keeping.

## Appendix 8: Home visit procedures

A home visit is when a member of staff visits a student's home (announced or unannounced) to verify a student's safety and/or well-being, or to attend an arranged meeting with a parent/carer in situations where a meeting at school is not possible.

Reasons for conducting home visits (this list is not exhaustive):

- Concerning or unexplained absence from school.
- Long term school refusal.
- Lack of parental contact.
- Concerns about a student's safety during school hours, but when they are not at school.
- A parent meeting where the meeting cannot take place online or in school.

### Procedure for conducting home visits

The members of staff who can authorise home visits are

- the headteacher
- the DSL
- deputy DSLs who are members of the senior leadership team
- the safeguarding manager.

The above members of staff can conduct home visits and authorise other staff, from the list below, to conduct a home visit:

- The SENCO.
- The assistant SENCO.
- The teacher of the hearing impaired.
- Heads of year.
- Behaviour mentors.
- The welfare officer.
- The attendance officer.
- The school counsellor.
- The safeguarding manager
- The inclusion officer.
- Other staff such as teachers and LSAs can attend home visits to assist one of the above members of staff and only if authorised by a member of staff with responsibility for authorising home visits.

### The procedure for home visits:

- The designated member of staff coordinating the home visit will decide whether it will be an announced or unannounced visit. Unannounced visits are done where the parent is uncontactable or if announcing the visit could lead to compromising the welfare check on the student. They will decide which members of staff should attend the visit,
- The intention to carry out the home visit will be logged on CPOMS before the visit takes place, by the designated member of staff coordinating the visit. .
- The designated member of staff coordinating the home visit will brief the members of staff conducting the home visit on the purpose of the visit and what to do and say on arrival at the student's home.



- A dynamic risk assessment will be carried out by the designated member of staff coordinating the home visit. This will identify any possible risks.
- The members of staff conducting the home visit will take a standard home visit letter to post through the letter box if no one is home. If a bespoke letter is required, this will be provided by the designated member of staff coordinating the home visit.
- On returning from the home visit, the more senior member of staff conducting the home visit will log the outcome on CPOMS.
- If a safeguarding concern needs to be raised as a result of the home visit then this will be done following the school's usual reporting procedures.
- If the members of staff conducting the home visit become aware of a situation where a student or any other child is in immediate danger then they will phone 999 and the phone the school to speak to the DSL or the headteacher.

Students should not be driven in staff vehicles unless this has been authorised by the headteacher, and the required insurances are in place. Staff should also not travel in taxis with students, unless this has been authorised by the headteacher.

## Appendix 9: 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
- carry out an online search as part of the due diligence of the shortlisted candidates
- 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 the 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

- we believe the individual has engaged in relevant conduct; or
- 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
- possible harm has been identified in respect of the individual (i.e. they may harm a student or vulnerable adult or put them at risk of harm); and
- the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

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

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

### **Contractors**

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

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

**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.