

DIOCESE OF  
**ST ALBANS**  
MULTI-ACADEMY TRUST

## Trust Policy

# Child Protection and Safeguarding Policy September 2023

## St James' CE Primary School

<b>Policy type</b>	Trust Policy with local context
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<b>Author</b>	Safeguarding Consultant
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This policy is a mandatory policy for all Diocese of St Albans Multi Academy Trust Schools and must be implemented without any amendments



## **Our mission, vision and values**

The Trust has a clear **mission** at its core, ensuring that all pupils are enabled to flourish, rooted in God's Love - academically, socially, spiritually, physically and mentally.

We have a clear **vision** about creating successful schools for the benefit of their communities. We expect any academy in the Trust to continuously improve. All academies provide rich and diverse curriculums which evolve to meet the needs of their children and local communities, as well as delivering educational excellence to enable them to flourish in later life.

The way we work and deliver against our mission is critical to our Trust. We have shared, agreed **values** of Hope; Nurture; Equality; Respect; Collaboration.

The Trust's vision is underpinned by a Christian values framework which is adopted by all Academies. It provides clear expectations for all DSAMAT employees on how the Trust wishes its values to impact on all areas of academy life. This draws on, and is informed by, the National Church of England Vision for Education and the Diocesan Board of Education Vision.

## **Our community**

The Trust is dedicated to delivering education that serves local communities. Our academies are inclusive, welcoming those from all and no faiths, from all abilities and backgrounds. We believe in providing a high-quality education, underpinned by Christian values, which enables every child to flourish.

Underpinning all of the Trust's work is a belief in educational excellence. The Trust serves all stakeholders by providing academies with the highest levels of academic rigour and pastoral care. Our academies are places where children and young people develop and thrive intellectually, socially, culturally and spiritually. All of the Trust's schools teach a broad and balanced curriculum within national guidelines focusing on core skills. This is designed to ensure that all pupils reach their academic potential and seek to enrich their experience along the way. Pupils will be enabled to succeed in an atmosphere of high expectation, aspiring to educational excellence with a firm foundation of values.

This policy forms part of our Trust governance and ensures that we are held to the highest standards as we carry out our duties.

## **Statement of Intent**

For the remainder of this document, the Diocese of St Albans Multi Academy Trust will be referred to as DSAMAT.

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## 1. Introduction

### 1.1 Children and Social Work Act 2017

This policy has been developed in accordance with the principles established by the 'Children Act' 1989; and in line with the following:

- 'Keeping Children Safe in Education' 2023
- 'Working Together to Safeguard Children' 2018 (updated July 2022)
- 'Framework for the Assessment of Children in Need and their Families' 2000
- 'Sharing nudes and semi- nudes' Dec 2020

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- 'Ofsted review of sexual abuse in schools and colleges June 2021
- 'What to do if you are worried a Child is being Abused' 2015

The Diocese of St Albans Multi-Academy Trust takes seriously its responsibility under section 11 of the Children Act and duties under “working together” to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements exist within the school to identify and support those children who are suffering harm or are likely to suffer harm. We recognise that all staff and, where appropriate, Local Governing Board members, have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern. Our academies will provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily. This policy applies to all staff, governors (governors are defined as members of the Local Governing Board, where they exist) and volunteers working in our school and to pupils in our care. This policy has been written in line with ‘Keeping Children Safe in Education’ 2023. All staff will sign to confirm they have read and understood and will work to achieve the aims of Part I of this document.

At St James C of E Primary School we are committed to safeguarding children and young people and we expect everyone who works in our school to share this commitment.

Adults in our school take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. However, it should be remembered that sometimes children will not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Abuse can happen in any context and in any family and a culture of “it could happen here” exists throughout every aspect of the school.

## 1.2 Terminology

**Safeguarding and promoting the welfare of children** refers to the process of protecting children from abuse or neglect, preventing the impairment of their mental and physical health or development, ensuring that children grow up in circumstances consistent with the provision of safe and effective and nurturing care and undertaking that role to enable those children to have optimum life chances and to enter adulthood successfully;

**Child protection** refers to the processes undertaken to meet statutory obligations laid out in the Children Act 1989 and associated guidance (see Working Together to Safeguard Children, An Interagency Guide to Safeguard and Promote the Welfare of Children) 2017 respect of those children who have been identified as suffering, or being at risk of suffering harm;

**Staff** refers to all those working for or on behalf of the school, full time or part time. In this specific context, it applies to those in both a paid and voluntary capacity and those working at the school for a third party;

**Child** refers to all young people who have not yet reached their 18th birthday;

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**Parent** refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents;

**Designated Safeguarding lead (DSL).** This is the person who takes lead responsibility for safeguarding in each school. Any concerns about children should be discussed with / reported to the DSL who will decide what action to take including referring to Children's Social Care or Police as appropriate. The key role of the Designated Safeguarding Lead is to:

- Take the lead responsibility for safeguarding and child protection (including online safety, monitoring and filtering);
- manage referrals from school staff or any others from outside the school;
- work with external agencies and professionals on matter of safety and safeguarding;
- undertake regular and appropriate training. Ensure all staff and volunteers receive regular and appropriate training;
- raise awareness of safeguarding and child protection amongst the staff and parents;
- ensure that child protection information is transferred to the pupil's new school
- engage with social care and specialist services as required;
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues with teachers and school and college leadership staff.

1.3 This policy consists of three main documents:

- the overarching safeguarding policy (statement of principles)
- detailed child protection procedures for each individual school
- a site-specific child protection summary sheet.

The latter is printed separately and provided routinely for those adults who will not have the opportunity to read this policy in its entirety but will have unsupervised contact, even as a 'one-off' with pupils on a temporary or intermittent basis such as supply, peripatetic or visiting professionals.

The DSAMAT appointed Safeguarding Consultant is **Lizzie Jeanes**

The DSAMAT appointed Safeguarding Strategy Lead is **Interim CEO**

The DSAMAT Safeguarding Link is the **Audit and Risk Committee**

## 2. Child Protection and Safeguarding Policy

2.1 In order to create a vibrant culture of safeguarding within each of its academies the Trust Board will:

- Appoint a senior member of the Executive staff as the Safeguarding Strategy Lead, with responsibility to oversee the implementation and management of this policy
- Ensure that all Directors take part in mandatory safeguarding training to ensure that they can 'assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.' This training is regularly updated. (see KCSIE (2023), paragraph 81.)
- Receive termly reports to full Board meetings on key issues, developments and concerns from the Safeguarding Strategy Lead

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2.2 The Trust Board will delegate the following functions to the CEO and central team:

- Commission safeguarding policy and practice review in each school upon entry into the DSAMAT. This will lead to report and actions
- Commission a Safeguarding Consultant to review on a regular basis the requirements of all LSCBs relevant to our academies and to amend this policy accordingly
- Co-ordinate through the Safeguarding Consultant, regular meetings for the Designated Safeguarding Leads in each School and opportunities for supervision
- Task the Safeguarding Consultant with undertaking monthly safeguarding conversations with a member of the safeguarding team for each school to provide support and professional challenge and to review the current safeguarding context of each school
- Ensure Safer recruitment procedures are followed that include the requirement for appropriate checks in line with national guidance and checking that the in-school leadership team are taking proportionate decisions on whether to ask for any checks beyond what is required; and ensuring volunteers are appropriately supervised
- Ensure there is a site-specific Safeguarding Policy and Staff Code of Conduct. Both should be provided to all staff – including temporary staff and volunteers – on induction

2.3 The Trust Board will delegate the following functions to its Local Governing Board:

- Appoint a Safeguarding Link Governor
- Confirm the LGB take part in mandatory safeguarding training to ensure that they can ‘assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective.’ This training is regularly updated. (see KCSIE 2023, paragraph 81)
- Receive the annual safeguarding audit for the LSCB from the Designated Safeguarding Lead, Trust Safeguarding Health check and ensure actions are completed
- Confirm and minute that school staff are up to date with all statutory training relevant to their roles so that they are able to carry out their responsibilities for safeguarding and promote the welfare of children

All children have the right to be safeguarded from harm or exploitation whatever their

- age
- health or disability
- gender or sexual orientation
- race, religion, belief or first language
- political or immigration status

Local Governing Board members and regular volunteers in all DSAMAT academies understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies in order to safeguard children and promote their welfare.

The purpose of this policy is to:

- afford protection for all pupils
- enable staff and volunteers to safeguard and promote the welfare of children

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- promote a culture which makes each school a safe place to learn and in which children feel safe

This policy applies to the Headteacher, all staff, including supply and peripatetic staff, regular volunteers (i.e. those who come into school once a week or more or 4 times in a 30 day period), Local Governing Board members or anyone working on behalf of the School.

We will endeavour to safeguard children and young people by:

- Always acting in their best interests;
- Valuing them, listening to and respecting them;
- Involving them in decisions which affect them;
- Never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through use of technology;
- Ensuring the curriculum affords a range of opportunities to learn about keeping themselves safe, particularly when using technology;
- Exercising our duties under the Counterterrorism and Security Act 2015 by ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our pupils being drawn into terrorism;
- Supporting attendance and taking action if a child is missing school regularly;
- Appointing a senior member of staff from our leadership team as the Designated Safeguarding Lead and ensuring this person has the time, funding, training, resources and support to perform the role effectively;
- Appointing at least one Deputy Designated Safeguarding Lead to ensure there is always someone available during school hours for staff to discuss any safeguarding concerns;
- Appointing a Designated Teacher to promote the educational achievement of children who are looked after/in care (this is mandatory in our academies) and to work closely with the virtual school head to discuss how pupil premium plus additional funding can support the progress of these children;
- Ensuring that staff working with children looked after have information appropriate to their role regarding, for example, the child's care arrangements, legal status and contact with birth parents;
- Making sure all staff and volunteers are aware of and committed to the safeguarding policy and child protection procedures and also understand their individual responsibility to take action;
- Ensuring that all those named above (i.e. DSLs and Deputy DSLs; Designated Teacher; Headteacher, all staff and regular volunteers) have training appropriate to their roles as set out in statutory guidance or recommended by the relevant LSCB;
- Identifying any concerns early and providing appropriate help to prevent them from escalating, including working with parents / carers and other agencies as appropriate – this may be through support offered by a senior leader or pastoral support workers in our academies;
- Sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately;
- Acknowledging and actively promoting that multi-agency working is the best way to promote the welfare of children and protect them from harm;
- Taking the right action, in accordance with the relevant LSCB inter-agency safeguarding

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- procedures, if a child discloses or there are indicators of abuse;
- Keeping clear, accurate and contemporaneous safeguarding and child protection records;
  - Recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training;
  - Providing effective management for the above through induction, support and regular training appropriate to role;
  - Adopting a code of conduct for all staff and volunteers which includes acceptable use of technologies, staff / pupil relationships and communications including the use of social media;
  - Ensuring our online safety process includes appropriate filters and monitoring systems;
  - Ensuring staff and volunteers understand about 'whistle blowing' and how to escalate concerns about pupils or staff if they think the right action has not been taken to safeguard children;
  - Promoting a culture in which staff feel able to report to senior leaders what they consider to be unacceptable behaviour or breaches of the Code of Conduct by their colleagues, having faith that they will be listened to and appropriate action taken;
  - Dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance.

### **Online filtering and monitoring**

'Keeping Children Safe in Education 2023 states that "governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system." (paragraph 141). Each academy must ensure that it meets the DfE 'Filtering and Monitoring standards' as laid out in KCSIE 2023 paragraph 142.

The Board of Directors will ensure that :

- ✓ Roles of responsibility are assigned within each academy;
- ✓ Relevant content is blocked without unreasonably impacting learning;
- ✓ Effective monitoring strategies are put in place to meet the safeguarding needs of each academy;
- ✓ Ensure the safeguarding Trustee has oversight of this strategic area.

The headteacher will:

- ✓ Work with the DSL to ensure that all staff receive appropriate training;
- ✓ Assign the role of online filtering and monitoring lead within the school;
- ✓ Ensure the school meets the DfE 'Filtering and Monitoring standards' as laid out in KCSIE 2023 paragraph 142;
- ✓ Ensure that checks to the filtering and monitoring system take place regularly.

The DSL will:

- ✓ Take the lead in all online safety;
- ✓ Oversee and act upon the filtering and monitoring reports;
- ✓ Act upon safeguarding concerns raised by filtering and monitoring reports or the reports of staff.

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All staff and volunteers will:

- ✓ Report (using the systems of the academy) if they see or suspect unacceptable content has been or can be accessed on site;
- ✓ Report (using the systems of the academy) if they learn that misspellings, abbreviations or changes in terminology or slang are allowing unacceptable content to be accessed

This child protection policy forms part of a suite of policies and other documents which relate to the wider safeguarding responsibilities of the school. In particular it should be read in conjunction with the:

- Staff behaviour policy (code of conduct) – all staff should be familiar with this document;
- E-safety policies for pupils and staff, which include use of mobile technologies;
- Recruitment, selection and disclosure policy and procedure within the Employment Manual;
- Procedures to handle allegations against members of staff and volunteers, including referring to the Disclosure and Barring Service (when appropriate);
- Whistle blowing policy;
- Procedures to respond appropriately when children are missing education
- Anti-bullying procedures and behaviour policy;

### **Teaching children how to stay safe at St James' CE Primary School**

At St James' CE Primary School children are taught about how they can keep themselves and others safe, including online. To be effective, we present this information in an age-appropriate way. We are sensitive to the specific needs and vulnerabilities of individual children, including children who are victims of abuse, and children with special educational needs or disabilities. Children are taught to recognise when they are at risk and how to get help when they need it.

Children have access to a team of staff, led by the Deputy Head, who are trained to support children with their own mental health and wellbeing.

Through PSHE lessons all children are taught how to keep themselves safe and when to recognise that they might be at risk.

As a whole school we deliver assemblies such as the NSPCC PANTS and Speak out, Stay Safe assemblies and there are posters around the school in communal areas that the children use regularly, to remind the children about talking pants.

There are also posters up around the school identifying who the children can talk to if they need to.

#### **What is child abuse?**

It is generally accepted that there are four main forms of abuse. The following definitions are

**Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional

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or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

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

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (see paragraph 29 of KCSIE 2023).

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

### **Recognising child abuse – signs and symptoms**

Keeping Children Safe in Education (2023) is clear *Safeguarding and promoting the welfare of children is everyone's responsibility. 'Everyone who comes into contact with children and their*

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*families has a role to play. In order to fulfil this responsibility effectively, all practitioners should make sure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.'* Recognising child abuse is not always easy, and it is not the responsibility of school staff to decide whether or not child abuse has definitely taken place or if a child is at significant risk. They do, however, have a clear individual responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here' and always act in the best interests of the child. Appendix 2 details examples of possible indicators of each of the four kinds of abuse. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse.

At St James' we are working in partnership with Bedford Borough Council and Bedfordshire Police to identify and provide appropriate support to pupils who have experienced domestic abuse in their household; nationally and locally, this scheme is called Operation Encompass. In order to achieve this, the police will share information with the Nominated SPOC of all domestic incidents where one of the pupils in the school has been affected. On receipt of any information, the Nominated SPOC will decide on the appropriate support the child requires.

All information sharing and resulting actions will be undertaken in accordance with the 'Operation Encompass guidance for schools'. The information will be recorded and stored in accordance with the record keeping procedures outlined in this policy.

### **When a child has a social worker**

At St James' Primary School CE Primary School we recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils. This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support pupils who have a social worker.

### **Mental Health**

All staff at St James' CE Primary School are 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.

School staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the designated safeguarding lead or a deputy. There is always a DSL available for discussion, or staff can make a referral using CPOMS

Where staff have a mental health concern only, they should discuss this with the Mental Health team which is led by the Deputy Head Teacher. In her absence, concerns can be discussed with any member of the team, or with the Head Teacher.

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## **Allegations made by children about other children, including Child on child abuse and “Upskirting”**

Children can abuse other children. This is generally referred to as Child-on-child abuse. We recognise that even if there are no reported cases of child-on-child abuse, such abuse may still be taking place and is simply not being reported. Child on child abuse can take many forms. This can include (but is not limited to) bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sending nudes and semi-nudes and initiating/hazing type violence and rituals. It can take place within intimate personal relationships between peers. It is more likely that girls will be victims and boys’ perpetrators, but that all child-on-child abuse is unacceptable and will be taken seriously. If one pupil causes harm to another, it is not always necessary for it to be dealt with through a referral to Children’s Social Care: sexual experimentation within ‘normal parameters’, bullying and fighting, for example, are not generally seen as child protection issues. All incidents will, however, be taken seriously, and the voice of all victims heard in a reassuring and supportive way. KCSIE 2023 Part 5 will be used. All victims should never feel that they are creating a problem by reporting sexual violence. The voice of the victim will be a key part of the decision-making process on how to proceed, and appropriate action taken. In defining ‘normal parameters’, we will make use of the Brook Sexual Behaviour Traffic Light Tool found at <https://www.brook.org.uk/our-work/the-sexual-behaviours-traffic-light-tool> . The nature and severity of the allegation or concern will determine whether staff will implement the school’s anti-bullying or other school procedures or whether a referral needs to be made to social workers or the Police .In line with the advice in paragraph 473 of KCSIE 2023, we recognise that the victim may ask for anonymity and there are no easy answers to this request. Ultimately, the designated safeguarding lead (or a deputy) will have to balance the victim’s wishes against their duty to protect the victim and other children.

### **Minimising Risk**

In order to minimise the risk of child-on-child abuse we follow our Behaviour policy, CP policy and the guidance in KCSIE.

For children who pose a risk of harm to others, we have a risk assessment in place, which is shared with staff.

This system is well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously;

### **Allegations**

Allegations of child-on-child abuse will be recorded by the member of staff it is reported to, or who witnesses it, investigated by SLT and dealt with by SLT in line with our Behaviour and CP policies and in conjunction with parents / carers.

### **Supporting those involved**

Victims, perpetrators and any other affected children will be supported in line with our CP and Behaviour policies. Any further referrals that are needed, i.e. to Chums or Wellbeing lead will be undertaken by DSL

A referral to Children’s Social Care will be made if a child or young person displays sexually

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harmful behaviour. This involves one or more children engaging in sexual discussions or acts that are inappropriate for their age or stage of development. It is also considered harmful if it involves coercion or threats of violence or if one of the children is much older than the other. The process for managing sexually harmful behaviour can be found in the inter-agency safeguarding procedures on the relevant LSCB websites. In brief, a multi-agency meeting should be convened by Children's Social Care following a referral and an action plan agreed. A risk assessment will be put in place, preferably by way of a meeting, which includes parents / carers and other professionals where they are involved. Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before taking action. Staff should be aware of the potential uses of information technology for bullying and abusive behaviour between young people.

**Sending nudes and semi-nudes** involves images or videos which are indecent or of a sexual nature, generated by children under the age of 18 or of children under the age of 18, shared via a mobile phone, handheld device or website. We endeavour to minimise the risk of child-on-child abuse through addressing issues in our curriculum / PSHE programmes, by working with other agencies and through appropriate risk assessments and policies. Pupils know how to report concerns and are encouraged to do so. All incidents involving child / young person-produced sexual imagery will be responded to in line with this policy.

When an incident involving youth produced sexual imagery comes to a school's attention:

- The incident should be referred to the DSL as soon as possible;
- The DSL should hold an initial review meeting with appropriate school staff;
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL/DDSL

We will follow the UKCCIS Guidance: 'Sharing nudes and semi-nudes 2020'. We will follow the advice of 'Sexual violence and sexual harassment between children in schools and colleges' September 2021.

### **Upskirting**

The Voyeurism (Offences) Act, is commonly known as the Upskirting Act. '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

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without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim. It is often performed in a crowded public place, which can make it difficult to notice offenders.

### **Domestic Abuse**

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- (a) physical or sexual abuse;
- (b) violent or threatening behaviour;
- (c) controlling or coercive behaviour;
- (d) economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services); and
- (e) psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person. The definition can be found here:

<https://www.legislation.gov.uk/ukpga/2021/17/part/1/enacted>)

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, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

The National Domestic Abuse helpline can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

### **Contextual Safeguarding and extra-familial harm**

Children can be at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation.

All staff are aware of contextual safeguarding and the fact they should consider whether wider environmental factors present in a child's life and a threat to their safety and/or welfare. To this end, we will consider all relevant information when assessing any risk to a child and share it with other agencies to support better understanding of a child and their family.

### **Pupils engaging in under-age sexual activity**

Sexual activity where one of the partners is under the age of 16 is illegal, although prosecution of children who are consenting partners of a similar age is not usual. DSLs will exercise professional judgement when deciding whether to refer to social workers, taking into account such things as imbalance of power, wide difference in ages or developmental stages etc. However, where a child is under the age of 13 penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to social workers in every case. The inter-agency

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safeguarding procedures, on the above websites, have more information about under-age sexual activity.

### **Child Sexual Exploitation (CSE)**

This form of abuse involves exploitative situations, contexts and relationships where young people receive something (e.g. food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money, mobile phones) as a result of their performing, and/or another or others performing on them, sexual acts. It can occur through the use of technology without the child's immediate recognition; e.g. being persuaded to post sexual images on the Internet/mobile phones without immediate payment or gain. Recognition of child sexual exploitation is part of staff training. We note that any child or young person may be at risk of sexual exploitation, regardless of family background or other circumstances, and can experience significant harm to physical and mental health. Key members of staff in our academies are expected to undertake CSE training and make themselves available to other staff for consultation. Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily. Secondary schools joining DSAMAT will be expected to ensure that Year 8 students and above will have seen and discussed performances of 'Chelsea's Choice' or benefited from other ways in which awareness is raised about child sexual exploitation. Any concerns about child sexual exploitation will be discussed with the Designated Safeguarding Lead who will take appropriate action which might include completing a risk assessment form. This risk assessment form, along with more detailed local procedures and a risk assessment tool are in the inter-agency safeguarding procedures on the relevant LSCB websites.

### **Child Criminal Exploitation (CCE):**

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

The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

Some of the following can be indicators of CCE:

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

### **County Lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion,

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intimidation, violence (including sexual violence) and weapons to ensure compliance of victims.

Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence (KCSIE 2023 paragraphs 37-39) and kidnap towards victims (and their families) if they attempt to leave the county lines network.

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Serious Violence**

All staff are aware of indicators which may signal that children are at risk from or involved with serious violent crime. These may include increased absence from school, a change in friendship or relationship with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in well-being, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that a child has been approached by, or is involved with, individuals associated with criminal networks or gangs.

### **Forms of abuse linked to culture, faith or belief**

All staff in the DSAMAT will promote mutual respect and tolerance of those with different faiths and beliefs. Some forms of abuse are linked to these (and often known collectively as 'so-called honour based Abuse') and staff should strive to suspend professional disbelief (i.e. that they 'could not happen here') and to report promptly any concerns to the DSL who will seek further advice from statutory agencies, prior to contacting parents / carers. Female Genital Mutilation is illegal and involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious and long-lasting implications for physical health and emotional well-being. Possible indicators include taking the girl out of school / country for a prolonged period or talk of a 'special procedure' or celebration. In addition to reporting any concerns to the Designated Safeguarding Lead, **teachers (along with regulated health and social care professionals) have a statutory duty to report personally to the Police if they discover that female genital mutilation has or appears to have been carried out on a girl under 18.** Those failing to report such cases will face 12 disciplinary sanctions. Any concerns about Female Genital

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Mutilation will be discussed with the Designated Safeguarding Lead who will take appropriate action which might include completing a risk assessment form. Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory and mandatory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover or are concerned (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 will face disciplinary sanctions. There are a range of potential indicators that a child or young person may be at risk of FGM:

- Knowing that the family belongs to a community in which FGM is practised and is making preparations for the child to take a holiday, arranging vaccinations or planning absence from School
- The child may also talk about a special procedure/ceremony that is going to take place or a special occasion to 'become a woman'. School staff should note that girls at risk of FGM may not yet be aware of the practice or that it may be conducted on them, so sensitivity should always be shown when approaching the subject. Indicators that FGM may already have occurred:
  - Prolonged absence from the school or other activities with noticeable behaviour change on return, possibly with bladder or menstrual problems;
  - Difficulty walking, sitting or standing, and look uncomfortable; • Spend longer than normal in the bathroom or toilet
  - May complain about pain between their legs or talk of something somebody did to them that they are not allowed to talk about. The Home Office has developed a free e-learning module to raise awareness of Female Genital Mutilation. All DSLs should complete it. <https://www.fgmelearning.co.uk/>

**Breast Ironing** is much like FGM, Breast Ironing in that it is a harmful cultural practice and is child abuse. Professionals working with children and young people must be able to identify the signs and symptoms of girls who are at risk of or have undergone breast ironing. Similarly, to FGM, breast ironing is classified as physical abuse therefore professionals must follow their Local Safeguarding Children's Board Procedures.

**Forced Marriage** is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by siblings. There might be a request for extended absence from school or might not return from a holiday abroad. We recognise that School staff can play an important role in safeguarding children from forced marriage. So called 'honour-based' abuse is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community. As of February 2023 the age of marriage in the UK increased to 18. It is now a crime in the UK to carry out any conduct whose purpose is to cause a child to marry before their 18<sup>th</sup> birthday. Even if violence, threats or another form of coercion are not used.

It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the violence are often committed with some degree of approval and/or collusion from family or community members. All forms of so-called

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honour-based abuse are abuse, regardless of the motivation, and should be referred accordingly.

### **Radicalisation and extremism**

Radicalisation' refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups. 'Extremism' is defined by HM Government as 'Vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs; and/or calls for the death of members of our armed forces, whether in this country or overseas'. In this school we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability. Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others. We recognise that children with low aspirations are more susceptible to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves. Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should 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. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. Exposure of children to extremist ideology can hinder their social development and educational attainment alongside posing a very real risk that they could support or partake in an act of violence. Radicalisation of young people can be compared to grooming for sexual exploitation. Extremism can take several forms, including faith based extremism and far-right extremism. It appears a decision by a young person to become involved in violent extremism:

- may begin with a search for answers to questions about identity, faith and belonging
  - may be driven by the desire for 'adventure' and excitement
  - may be driven by a desire to enhance the self-esteem of the individual
  - is likely to involve identification with a charismatic individual and attraction to a group which can offer identity, social network and support
  - is likely to be fuelled by a sense of grievance that can be triggered by personal experiences of racism or discrimination
- Recognising Extremism - early indicators may include:
- Showing sympathy for extremist causes
  - Glorifying violence
  - Evidence of possessing illegal or extremist literature
  - Advocating messages similar to illegal organisations
  - Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)

The DSAMAT is subject to a duty under section 26 of the Counterterrorism and Security Act 2015

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(‘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. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. Children are taught about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the Internet. Any concerns about pupils becoming radicalised or being drawn into extremism will be reported to the school DSL who will not speak to parents/carers or other family members at this stage but will take prompt advice from the Police. At St James’ Primary School CE Primary Academy our first point of contact would be the DSL.

Statutory guidance requires schools to assess the risk of children being drawn into terrorism, including on-line. Risk assessments will vary from school to school, depending on local contexts. The Trust has a model risk assessment as part of its Radicalisation and Extremism Policy. The Designated Safeguarding Lead is also the Prevent Lead. All local authorities within the DSAMAT area have Channel Panels in place, in accordance with their duties under the Counter Terrorism and Security Act 2015. This is a multi-agency meeting which discusses individuals who have been referred by the Police as being vulnerable to being drawn into terrorism. Where pupils from the DSAMAT are being discussed, the relevant DSL or Headteacher will attend the Panel meetings. Staff, regular volunteers and governors in our academies have either attended a WRAP (Workshop to Raise Awareness of Prevent) session or have completed on-line Prevent training. Those who do not attend a WRAP taught session should complete an on-line course, such as that provided free by the Home Office, followed by a discussion with the DSL to confirm understanding ([www.elearning.prevent.homeoffice.gov.uk](http://www.elearning.prevent.homeoffice.gov.uk)). There is no guidance on how often Prevent training should be repeated but we recommend it should be at least at the same frequency as whole-school safeguarding training. Academies should include Prevent as part of induction for staff; individuals who have not already done so can complete an online course, followed by a discussion to ensure they have understood their responsibilities.

### **Outside organisations that hire school premises**

If outside organisations hire school premises, the headteacher should ensure that the written agreement includes reference to the Prevent duty. For example: Not to use or permit or suffer the Property or any equipment at the Property to be used in any manner or for any purpose which facilitates encourages or promotes extremism or terrorism or which allows access to or the dissemination of information in any form relating to extremism or terrorism or which causes or might cause the Landlord to be in breach of any duty under the Counter-Terrorism and Security Act 2015 or guidance issued pursuant to that Act.

The headteacher must ensure that hirers who work with children ensure that they meet the [‘Keeping children safe during community activities, after-school clubs and tuition: non-statutory guidance for providers’](#). Hirer must complete the audit tool in this document and provide a signed and dated copy for the school.

### **Children Absent from Education**

We recognise that a child absent from education is a potential indicator of abuse and neglect, including the specific types of abuse detailed above and/or travelling to conflict zones. Knowing where children are during school hours is an extremely important aspect of Safeguarding. Being absent from school can be an indicator of abuse and neglect and may also raise concerns about

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others safeguarding issues, including the criminal exploitation of children.

We monitor attendance carefully and address poor or irregular attendance without delay. At St James' CE Primary School we will always follow up with parents/carers when pupils are not at school. We do this by first telephoning the child's parent/carer or those with Parental Responsibility. If attendance continues to be a cause for concern, a letter will be sent to the parent/carer offering support to improve attendance. We are guided by the Attendance Toolkit (Bedford Borough) and supported by the Education Welfare Service.

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority. When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.



## Responding to concerns

### Referring your concerns at St James' CE Primary School

If you are a member of staff you will have a log in to our online reporting system CPOMS. All staff are fully trained on this system, but if you have any further training needs please consult the DSL. If you are a volunteer you must, on entry to the school, read the St James' visitors safeguarding leaflet and ensure that you have identified the DSL and DDSLs (Posters are displayed throughout the school).

If you have a concern about a child or a child discloses something to you, you must write an account of the concern or disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL. Do not ask the pupil to repeat the disclosure to anyone else in school, ask him/her or any other pupil to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth.

Remember – share any concerns, don't keep them to yourself.

### Responding to the child who discloses (talks about) abuse.

All staff and volunteers will:

- make it clear you are obliged to pass the information on, but only to those who need to know
- Observe the child's demeanour;
- listen carefully without interruption, particularly if s/he is freely recalling significant events
- only ask sufficient questions to clarify what you have heard. You might not need to ask anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions. Remember TED: Tell me.... Explain.... Describe...;
- Reassure the child, if necessary, that s/he has done the right thing in telling;
- Explain what will happen next and with whom the information will be shared;
- Not ask the child to repeat the disclosure to anyone else in school – including the DSL - or ask him/her or any other children who were present to write a written account or 'statement'.
- tell the DSL or Deputy **without delay**
- write an account of the disclosure as soon as you are able using the schools reporting system(definitely the same day), date and sign it and give it to the DSL.

### Taking action

The staff member will not ask to see injuries that are said to be on an intimate part of the child's body. Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straight away or, where they are not available and concerns are immediate, ensure a referral is made without delay to the Children's Social Care team which covers the area in which the child and family live using CBC BIC 100/ Herts safeguarding referral forms. Where the child already has an allocated social worker, that person or a manager or duty worker in the same team will be contacted promptly. A written record will then be made (ideally on a standard school 'concern' form or online referral system) of what was said, including the child's own words, as soon as

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possible and given to the DSL. If the child can understand the significance and consequences of making a referral to social workers, they will be asked for their views. It will be explained that whilst their views will be taken into account, the school has a responsibility to take whatever action is required to ensure the child's safety and that of other children. The DSL will decide whether to contact parents at this stage, judging whether do so is likely to place the child at risk of harm from their actions or reactions - for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the duty worker first and agree with him/her when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's school child protection file. A child protection referral from a professional cannot be treated as anonymous. Where there is no disclosure by a child, but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies. The relevant LSCB 'Threshold Document' should be used to help clarify the pathway required for a child: whether concerns will be managed within each School; or with the help of other agencies as part of early help; or whether they require specialised support such as a social work assessment or referral to Child and Adolescent Mental Health Services (CAMHS). A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to social workers.

### **Responding to concerns reported by parents or others in the community**

Occasionally parents or other people in the local community tell school staff about an incident in or accumulation of concerns they have about the family life of a child who is also a pupil at the school. If the incident or concern relates to child protection, the information cannot be ignored, even if there are suspicions about the motives for making the report. Members of staff will therefore pass the information to the DSL in the usual way. It is preferable if the parent / community member who witnessed or knows about the concerns or incident makes a call to Social Care themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family. The DSL will advise accordingly and later confirm that this referral has been made. If the parent / community member refuses to make the referral, the DSL will clarify that s/he has a responsibility to do so and will also need to pass on to social workers how s/he is aware of the information. This process also applies to parents / community members who are also School staff. As professionals who work with children, they cannot be anonymous when making the referral but can ask for the situation to be managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

***Remember ANY suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, MUST be acted on. Doing nothing is not an option. Any suspicion or concerns will be reported without delay to the DSL or Deputy.*** During term time the Designated Safeguarding Lead and/or a Deputy should always be available (during school or college hours) for staff to discuss any safeguarding concerns. However, if for whatever reason they are not available the staff member will discuss their concerns as soon as possible with either:

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- Another senior member of staff **or**
- The duty worker in the Social Care Team responsible for the area where the child lives – the single point of contact.

Anyone can make a referral to Social Care, not just the DSLs. It is important that everyone in the school is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether or not abuse has occurred and should not conduct an ‘investigation’ to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of School staff is to act promptly on the information received. This applies regardless of the alleged ‘perpetrator’: whether the child talks about a family member or someone outside school, a member of staff or another child/pupil. A careful record will be made of what has been seen/heard that has led to the concerns and the date, time, location and people who were present. As far as possible, staff should record verbatim what was said and by whom. The record will be passed to the DSL. The DSL will keep a record of the conversation with the duty worker and other social workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the inter-agency referral form as soon as possible and at least within 24 hours. A school child protection file will be started in the child’s name, where the child is not already known to social workers. If a file already exists, the new information will be added to the chronology. See Appendix 4 below for detailed record keeping guidance.

## **Response from Children’s Services Social Care to a school referral**

### **Referral**

Once a referral is received by the relevant team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly, and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989). The Designated Safeguarding Lead should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.

### **Assessment**

All assessments should be planned and co-ordinated by qualified social worker. They should be holistic, involving other professionals, parents/carers and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes and usually take no longer than 45 working days from the point of referral. Academy staff have a responsibility to contribute fully to the assessment.

### **S47 Enquiries (regarding significant harm)**

The process of the investigation is determined by the needs of the case, but the child/young person will always be seen as part of that process and sometimes without parents’ knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a video-recording of the interview is made.





### **The Child Protection Conference**

If, following the s47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and School staff will be invited to attend - normally the DSL or Headteacher. This person will produce a written report in the correct format (a proforma is available on the DSCB website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance. More information is in the inter-agency safeguarding procedures ('Child Protection Conferences') on the relevant LSCB websites. If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers (under the escalation policy available on the relevant LSCB websites), particularly if the child's situation does not appear to be improving.

### **Responding to allegations or concerns about adults including staff, governors, directors, volunteers, supply teachers and agency staff**

Rigorous recruitment and selection procedures and adhering to the school's code of conduct and safer practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers in schools and colleges. Concerns may come from various sources, for example, a 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.

Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without taking action. All staff and volunteers will take action by reporting to the Headteacher (not the DSL if this is a different person).

The headteacher has to decide whether the concern is an allegation or low-level concern. Before contacting the LADO, schools and colleges should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation.

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below).

However, it is an allegation (and will be reported without delay) if the person\* has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates 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 (also includes behaviour outside the school).

(\*Person could be anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors.)

If the allegation / concern is about the Headteacher, the person with concerns will contact the Designated Officer (also known as the LADO) in the Local Authority and Trust Chief Operating Officer (COO) [mmccoll@stalbandsmat.co.uk](mailto:mmccoll@stalbandsmat.co.uk) (KCSIE 2023 paragraph 72).

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See Appendix 1 below for contact numbers.

The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school or college, or a combination of these.

### **Allegations made against staff of hirers to run activities for children using academy premises**

If the school receives information that there is an allegation about a member or members of staff of hirers using the school premises for work with children this must be reported to the headteacher. The headteacher will then follow the procedures for reporting of allegations against staff, including if necessary reporting to the LADO.

### **Low-level Concerns**

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours 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.

If the concern has been raised via a third party, the headteacher should collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel 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.

Low-level concerns should be recorded in writing, including:

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

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If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised or extra training delivered to minimise the risk of it happening again.

### **Children who with Special educational needs and/or disabilities (SEND) or have certain health conditions**

Research shows that children with special educational needs and/or disabilities, or with certain health conditions are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse or neglect

These can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEND can be disproportionately impacted by things like bullying – without outwardly showing any signs; and
- Communication barriers and difficulties in overcoming these barriers.

These child protection procedures will be followed if a child with special educational needs or who is disabled discloses abuse or there are indicators of abuse or neglect. At St James' Primary School CE Primary School we identify pupils who might need more support to be kept safe or to keep themselves safe by meeting parents regularly to discuss and update their family circumstances. We also liaise with outside agencies such as the Family Support Worker, CBC, CHUMS, School Nurse and the Traveller Liaison Officer to ensure that these children are monitored carefully. The school also uses ISP's and EHCPs to support the needs of vulnerable pupils. We also have Care Plans for those children who have specific medical conditions and needs.

Staff responsible for intimate care of children will undertake their duties in a professional manner at all times and in accordance with each school's intimate care policy. We will always seek to find ways of enabling children with communication difficulties to express concern and find assistance such that, as far as possible they can convey how they are feeling and report issues of concern. We will ensure that staff who are engaged in working with such children receive the appropriate training and understand policies or procedures which contribute to keeping safe their pupils with SEN or who are disabled.

### **Safer Working Practice**

All adults who come into contact with children in the DSAMAT will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made. Detailed advice on safer working practice can be found in the school's Code of

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Conduct. We promote a culture whereby members of the school community should feel able to raise with the Headteacher, or any member of the leadership team, any concerns about staff conduct. If the reporter feels that the issue has not been addressed, they should contact the Trust COO [mmccoll@stalbandsmat.co.uk](mailto:mmccoll@stalbandsmat.co.uk) or the LADO. (See Appendix 1 for contact number).

### **Children and online safety away from school and college**

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the Child Protection Policy and where appropriate referrals should still be made to children's social care and as required, the police.

Online teaching should follow the same principles as set out in staff code of conduct

We will ensure any use of online learning tools and systems is in line with privacy and data protection/UK GDPR requirements. All staff will follow the agreed Video Communication Protocol.

### **Training**

Child protection will be part of induction for all staff and volunteers new to St James' Primary School CE Primary Academy. They will be given a copy of this policy, the Code of Conduct, the behaviour policy; details about the role of the DSL and part one of 'Keeping Children Safe in Education 2023: information for all school and college staff' plus Annex B if they work directly with children. This will be followed up by basic child protection training that equips individuals to recognise and respond appropriately to concerns about pupils. A proportional risk-based approach will be taken regarding the level of information provided to all temporary staff and volunteers. As a minimum they will be provided with, and will be expected to follow, the site-specific child protection summary sheet which forms part of this policy. Staff who do not have designated responsibility for safeguarding and child protection, including the Headteacher, will undertake suitable refresher training at appropriate intervals. All staff will have training in preventing radicalisation and extremism ('Prevent') – either by attending a Workshop to Raise Awareness of Prevent (WRAP) or completing an on-line course, followed by a discussion with the DSL. The DSL is the Prevent Lead and will attend WRAP. In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available. When DSLs and Deputies take up the role, they will attend enhanced (Level 3) training, or the equivalent in their LSCB area – provided through a multi-agency course. They must be updated at 2 yearly intervals after that. In addition, their knowledge and skills will be updated regularly - at least annually. These individuals are expected to take responsibility for their own learning about safeguarding and child protection by, for example: taking time to read and digest newsletters and relevant research articles; attending training offered by the LSCB on matters such as domestic abuse, online filtering and monitoring, attachment and child sexual exploitation; completing on-line training on FGM; attending local DSL forums and the DSAMAT safeguarding team meeting each half term etc. Designated Teachers for Looked After Children will undertake appropriate training. Headteachers and all members of the Senior Leadership Team (SLT) in each academy will complete safer recruitment either through a multi-agency

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taught session or by completing the NSPCC on-line course. It is recommended that all Local Governing Board members attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties as governors, set out in 'Keeping Children Safe in Education' 2023. Attendance includes those who also work with children and have attended child protection training in that role. The member of the Audit and Risk committee who take leadership responsibility for safeguarding should attend similar training, briefings or other input.

Peripatetic music teachers and other such visitors need to demonstrate evidence of child protection training. These staff generally work one to one with pupils so it is particularly important for them to be confident in recognising and reporting welfare concerns and they should also understand and behave in accordance with the principles of safer working practice. This clearly applies to other adults who are working with pupils but not employed by the School. Whatever training they have completed (such as on-line, whole-school, Level 2 multi-agency etc.) should include as a minimum how to recognise and act on abuse and neglect, and how to respond to a disclosure. Each school will ask for evidence such as course certificates.

### **Raising concerns about safeguarding practice in DSAMAT Academies - whistleblowing**

In all DSAMAT Academies we promote a culture where any staff or volunteers feel able to raise with the Headteacher any concerns about safeguarding or child protection practice. Any issues which they have not been able to resolve with the Headteacher should be reported to the Chief Operating Officer. If they are still not satisfied, they should approach the Chief Executive Officer or, if the issue relates to the conduct of or allegation against a member of staff, they should contact the designated officer (also known as the LADO). Staff should refer to the school's whistle-blowing policy (part of the Trust's Employment Manual) for more information or can use the NSPCC whistle blowing helpline: 0800 0280285.

### **Information for parents and carers**

Each DSAMAT Academy is committed to keeping our pupils safe. Our first priority is your child's welfare and we will usually discuss with parents any concerns we have about your child. There might be rare occasions, however, when we have to provide information to or consult other agencies such as Children's Services Social Care before we contact parents. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm. Our responsibilities are set out in this policy. It reflects statutory guidance and the Inter-Agency Safeguarding Procedures, which can be found on the relevant Local Safeguarding Children Board websites. If you have any questions about this, please speak to the Designated Safeguarding Lead named in the site-specific appendix in this policy.

### **Private Fostering**

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins. Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a

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potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery. Schools and academies have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools and academies have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the DSL when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.



### 3. Child Protection Summary for all Visiting Professionals St James' CE Primary School

3.1 As an adult working directly with children in this school you have a duty of care towards all pupils. This means you must act at all times in a way that is consistent with their safety and welfare.

It is your responsibility to keep your child protection training up to date; you will be asked for evidence of this.

You must follow the principles of safer working practice, which include use of technology – on no account should you make contact or take images of pupils on personal equipment, including your mobile 'phone.

If the behaviour of another adult at St James' Primary School CE Primary School gives rise to concern you must report it to the Headteacher.

If you have a concern about the behaviour of the Headteacher you must report it to the Trust COO [mmccoll@stalbandsmat.co.uk](mailto:mmccoll@stalbandsmat.co.uk).

If you have a concern about a child, particularly if you think s/he may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly. This include seeing or suspecting a child may have accessed inappropriate content online whilst at school.

**Information must be shared before you leave the site** with the Designated Safeguarding Lead (DSL) or the Deputy who are:

DSL: Alison Barden  
DDSL: Sarah Morton  
DDSL: Ian Leach

The following is not an exhaustive list, but you might become concerned as a result of:

- seeing a physical injury which you believe to be non-accidental;
- observing something in the appearance/demeanour of a pupil which leads you to think his/her needs are being neglected;
- a pupil telling you that s/he has been subjected to some form of abuse;
- seeing or suspecting a pupil has accessed inappropriate online content in school.

In any of these circumstances you must report your concern **immediately** to the DSL or DDSL and record what you have seen or heard using your CPOMS login (if you have one) or a paper safeguarding concern form (available from the office) ensuring your report is detailed and accurate with signature and date.

If a pupil talks to you about (discloses) sexual or physical abuse you:

- listen carefully without interruption, particularly if s/he is freely recalling significant events
- only ask sufficient questions to clarify what you have heard. You might not need to ask

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anything but, if you do, you must not 'lead' the pupil in any way so should only ask 'open' questions

- make it clear you are obliged to pass the information on, but only to those who need to know
- tell the DSL or Deputy without delay
- write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL. Do not ask the pupil to repeat the disclosure to anyone else in school, ask him/her or any other pupil to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth. Remember – share any concerns, don't keep them to yourself.

**This page should be printed separately and given to all supply/peripatetic/ temporary staff who will be working with children, even if just for one day.**





## 4. Monitoring and Review

4.1 The policy will be reviewed annually or if there are changes to the relevant legislation.



## **Appendix 1**

### **Useful Contacts**

#### Central Bedfordshire

LADO - 0300 300 4833.

Children's Services – 0300 300 8585

SOOHS (Out of Hours Service-Children's Services) – 0300 300 8123

#### Bedford Borough

LADO - 01234276693 [lado@bedford.gov.uk](mailto:lado@bedford.gov.uk)

MASH - 01234 718700 [multiagency@bedford.gov.uk](mailto:multiagency@bedford.gov.uk)

MASH (Out of Hours) 0300 300 8123

#### Hertfordshire

LADO 01992 555420 [LADO.Referral@hertfordshire.gov.uk](mailto:LADO.Referral@hertfordshire.gov.uk)

Children's Services 24 hours a day – 0300 123 4043

#### Luton

LADO 01582 548 069 or via secure email: [LADO@luton.gov.uk](mailto:LADO@luton.gov.uk)

MASH: 01582 547653 [mash@luton.gov.uk](mailto:mash@luton.gov.uk)

Out of hours: 0300 3008123

#### NSPCC

NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally.

Staff can call 0800 028 0285 from 8:00 AM to 8:00 PM, Monday to Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)



## Appendix 2

### Possible Indicators of Abuse

The following information is not designed to turn School staff into experts, but it will help them to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; Designated Safeguarding Leads and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2015) and the inter-agency safeguarding procedures on the Local Safeguarding Children Board website for more detailed information.

#### **i) Physical Abuse**

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be more or less noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken. Patterns of bruising that are suggestive of physical child abuse can include:

- Bruising in children who are not independently mobile;
- Bruises that are seen away from bony prominences;
- Bruises to the face, back, stomach, arms, buttocks, ears and hands;
- Multiple bruises in clusters;
- Multiple bruises of uniform shape;
- Bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle.

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- Cigarette burns;
- Adult bite marks;
- Broken bones;
- Scalds. Changes in behaviour which can also indicate physical abuse:
- Fear of parents being approached for an explanation;
- Aggressive behaviour or severe temper outbursts;
- Flinching when approached or touched;
- Reluctance to get changed, for example wearing long sleeves in hot weather;
- Missing school;
- Running away from home.

#### **ii) Emotional Abuse**

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. Children who live in

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households where there is domestic violence often suffer emotional abuse. Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- A failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- Sudden speech disorders
- Developmental delay, either in terms of physical or emotional progress

Changes in behaviour which can also indicate emotional abuse include:

- Neurotic behaviour, e.g. sulking, hair twisting, rocking
- Being unable to play
- Fear of making mistakes
- Self-harm
- Fear of parents being approached

### iii) **Sexual Abuse**

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. It is important to remember that children can also be sexually abused by other children (i.e. those under 18)

Usually, in cases of sexual abuse it is the child's behaviour which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- Pain or itching in the genital/anal areas
- Bruising or bleeding near genital/anal areas
- Sexually transmitted disease
- Vaginal discharge or infection
- Stomach pains
- Discomfort when walking or sitting down
- Pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- Sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- Fear of being left with a specific person or group of people
- Having nightmares
- Missing school
- Running away from home
- Sexual knowledge which is beyond their age or developmental level
- Sexual drawings or language
- Bedwetting
- Eating problems such as overeating or anorexia
- Self-harm or mutilation, sometimes leading to suicide attempts

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- Saying they have secrets they cannot tell anyone about;
- Alcohol / substance / drug use
- Suddenly having unexplained sources of money
- Not being allowed to have friends (particularly in adolescence)
- Acting in a sexually explicit way towards adults or other children

#### iv) **Neglect**

Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

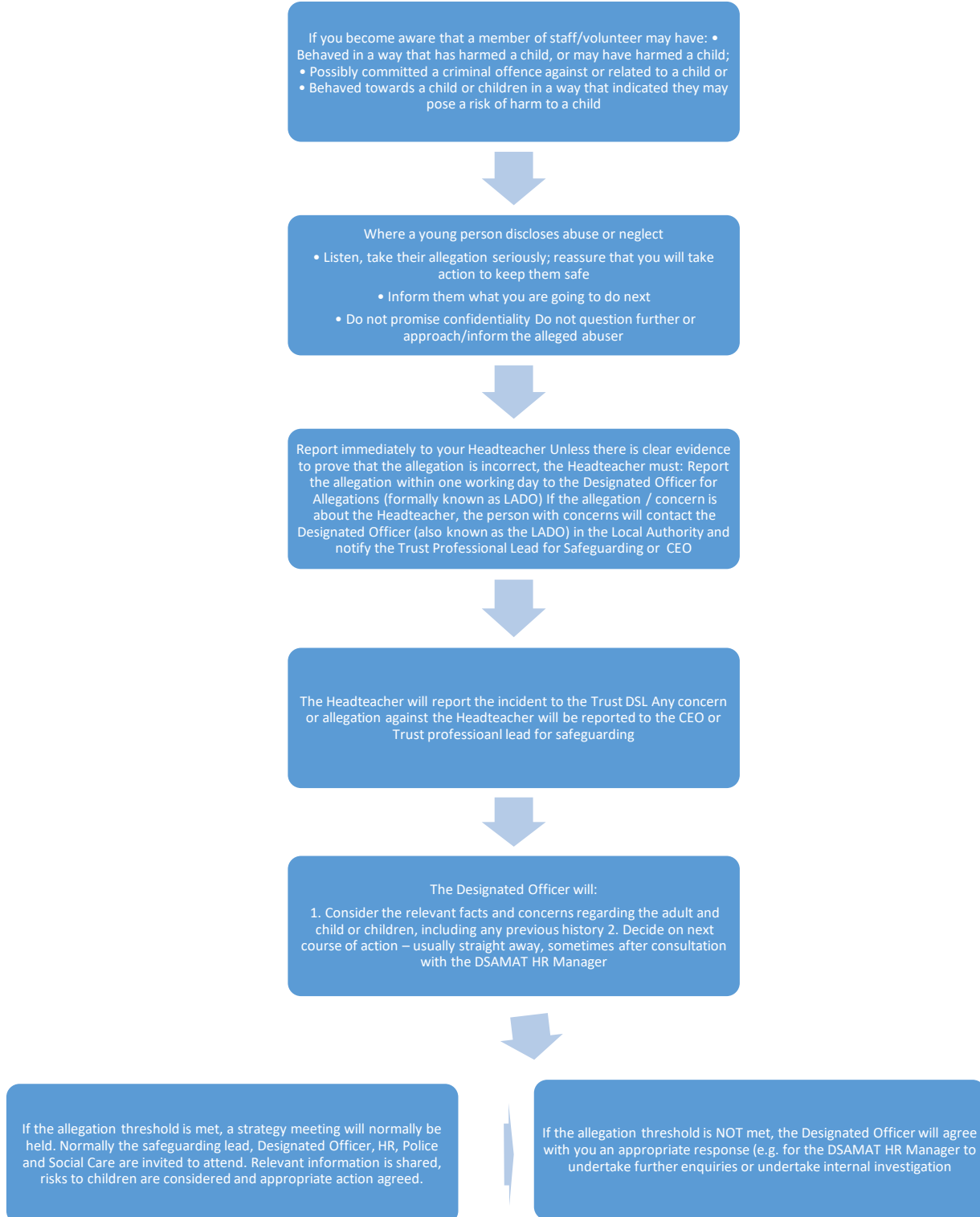
It is important that adults in school recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in school finds s/he is regularly attending to one or more aspects of a child's basic needs, then this will prompt a discussion with the Designated Safeguarding Lead.

The general rule is the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they have the ability to care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be seen as a potential indicator of neglect.

School staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the inter-agency neglect guidance on the LSCB website.



### Appendix 3 Allegations Against Adults – Risk of harm to children Guidance Flowchart



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## Appendix 4

### Record Keeping: Best Practice for DSLs

#### 1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Child Safeguarding Practice Reviews .
- 1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.
- 1.3 The common law of confidentiality, Data Protection, UK GDPR and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made. KCSIE 2023 clarifies (paragraphs 115-123) the conditions under which information can be shared without consent in order to maintain the safety of a child.
- 1.4 Any electronic record keeping system should comply with the general standards set out below. (The 'CPOMS' system in use in many local schools has been checked for compliance).

#### 2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

- 2.1 This record should be made as soon as possible after the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of particular relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.
- 2.2 The record should ideally be on a standard 'concerns' form but if this is not used, should include:
  - The child's name, gender and date of birth;
  - Date and time of the conversation;
  - What was the context and who was present during the disclosure?
  - What did the child say? – verbatim if possible;
  - What questions were asked? – verbatim;
  - Responses to questions –verbatim;
  - Any observations concerning child's demeanour and any injuries;
  - The name of the person to whom the disclosure was reported;
  - Printed name and job title of the author, followed by signature and date.
- 2.3 The record about a disclosure of abuse should be passed to the DSL and retained in the pupil's child protection file in its original and contemporaneous form (as it could be used as evidence in court proceedings), even if later typed or if the information is incorporated into a report.
- 2.4 Schools should never ask pupils, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside school.

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### **3. Records kept by the Designated Safeguarding Lead**

- 3.1 As stated at 2.2 above it is useful and recommended practice for school staff to have one standard pro forma for recording all 'welfare' and child protection concerns.
- 3.2 The concern form should be passed to the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision-making process about any action, whether or not a referral is made to Social Care, will be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.
- 3.4 All 'lower level' concerns about a child's welfare, which will generally have been discussed with parents/carers, are kept in the child's main file. Alternatively, some schools have adopted their own systems of collating such welfare concerns, but whichever system is in place, these records should not be labelled 'child protection'.
- 3.5 It is never good practice to keep pupil welfare records in a diary or day-book system. Often it is only when a number of seemingly minor issues relating to an individual pupil over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

### **4. Starting a school child protection file**

- 4.1 A school child protection file does not necessarily mean that the pupil is or has been the subject of a child protection conference or plan. 'Child protection file' denotes a high level of school concern which has warranted the involvement of, and in most cases assessment by, childcare social workers.
- 4.2 It is the responsibility of the DSL to start a school child protection file when a social worker is or was involved, e.g.: a) A formal referral is made by the school to Children's Social Care on an inter-agency referral form; or b) Social Care inform the Academy they have commenced an assessment in relation to a pupil resulting from information from another source; or c) A child protection file is forwarded to the school by a previous school or pre-school attended by the pupil; or d) A child who is in care/looked after transfers into the school; e) A pupil is privately fostered.
- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the school should be clearly noted on individual files.
- 4.4 If two (or more) pupils at the school are referred to Social Care for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all pupils.
- 4.5 'Document wallet' - type files are not ideal as the papers therein can easily fall out or get 'out of order'.
- 4.6 School child protection files are never 'closed' or de-categorised. Once a school has started a child protection file, it is always an School child protection file and the chronology is maintained so that any future concerns can be considered in the context of past events.
- 4.7 `Note - If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection file should not be started.

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## **5. Adopted children**

- 5.1 When a pupil is admitted to a school in Reception class and parents provide the information that s/he was adopted prior to commencing education, this should be recorded with their permission on the main school file in order that appropriate support can be provided in future if necessary. In these situations, it is not necessary to start a child protection file unless the criteria described above (at 4.2a and 4.2b) also apply.
- 5.2 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.
- 5.3 Once the adoption order has been made the DSL in the school that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file, it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.
- 5.4 A chronology should be prepared that gives an overview of the information previously held in the file but without giving the child's birth name or any details which would identify the birth family.
- 5.5 The overhauled file should only contain the new chronology and any information that has originated from within school (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the school as long as the child remains or sent onto a new school as described (at 9) below.
- 5.6 Please note that once a child is adopted, all school records, not just child protection files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

## **6. The format of child protection files**

- 6.1 As a Trust, many of our academies now make use of the CPOMS Child Protection online package for recording chronologies and concerns. Paper files will also be kept as required and will follow the guidelines below as appropriate.
- 6.2 It is helpful if individual files have a front sheet with key information about the pupil and contact details of parents/carers, social worker and any other relevant professionals.
- 6.3 If the child is Looked-After the front sheet should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school head in the authority that looks after the child.
- 6.4 If a pupil is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.
- 6.5 It is a multi-agency standard that children's child protection files must have at the front an up to date chronology of significant incidents or events and subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.
- 6.6 It should make sense as a 'standalone' document: anyone else reading the chronology should be

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able to follow easily what the concerns are/have been, whether the concerns have escalated and why plus the actions taken by the school to support and protect the child. This will be particularly useful for DSLs in receiving schools when pupils transfer, for professionals involved in collating information for Serious Case Reviews and for parents/pupils/ex-pupils if they view the record.

- 6.7 Once a chronology is started it should be updated as appropriate even if Social Care later cease involvement (see 4.6 above).
- 6.8 The file should be well organised and include, as appropriate, school 'concern forms', copies of correspondence, school reports to and minutes of child protection conferences, documents relating to children in care/'looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

## **7. Storage**

- 7.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other school files, and accessible through the DSL or their Deputy (ies). This should be in an office that is locked when not inhabited and for which there are limited number of keys. The online reporting and recording systems have clear systems and these must be followed.
- 7.2 The pupil's general school file should be marked in some way (e.g. a yellow star) to indicate that a child protection file exists. All staff who may need to consult a child's school file should be made aware of what the symbol means and to speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

## **8. Sharing of and access to child protection records**

- 8.1 It is highly unlikely that all members of staff need to know the details of a child's situation, or that there should be widespread access to the records. Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to what needs to be shared. Generally speaking, the closer the day to-day contact with the child, the more likely the need to have some information.
- 8.2 The child who is the subject of a child protection record has the right to access the file, unless to do so would affect his/her health or well-being or that of another person, or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.
- 8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older pupil may be entitled to refuse access to the record by his/her parents. As a guide, this applies to pupils who are 12 years of age or above, if they are of normal development or maturity.
- 8.4 References by name to children other than the pupil who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 8.5 Always seek advice from your legal advisor or Luton/ CBC/Beds Borough/ Herts Data Protection Officer if there are any concerns or doubt about a child or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold

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it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other pupils, to be removed.

- 8.6 In respect of requests from pupils or parents for information which wholly or partly consists of an educational record, via a Subject Access Request (UK GDPR 2018), access should be granted within 30 calendar days. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 - £50 (maximum) depending on the number of pages.
- 8.7 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a teacher in their teaching role or a school nurse in their nursing role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).
- 8.8 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. OFSTED can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the Academy's legal advisor in such cases.
- 8.9 Hub Board, including the Nominated Member, should not access the records.
- 8.10 Further advice about disclosure of information held in child protection records can be sought from the DSAMAT Central Office

## **9. Transfer of child protection records**

When a pupil transfers to another school (including to a Learning Centre because of permanent exclusion) the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on by hand (or in exceptional circumstances) sent by recorded delivery, separate from the child's main school file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible. If the records are to be posted, they should be copied, and these copies retained until there has been confirmation in writing that the originals have arrived at the new school. They can then be shredded. Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society). To comply with UK GDPR academies are asked only to retain a receipt to evidence transfer. If the pupil is removed from the roll to be home educated, the school should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above. If a pupil with a child protection record leaves the school without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Absent from Education procedures. If there is reason to suspect the pupil is suffering harm, then the DSL will refer to Social Care in the usual way. If the pupil is removed from the roll to be educated overseas the academy should take legal advice as to the most appropriate course of action. If a child arrives in the school in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a child protection file which has not been passed on. School 'welfare' or pastoral records (i.e. where concerns or issues have been raised but there has been no referral to or involvement by a social worker) should also be passed on to the next school for their information and can be included in the main school file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you

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should not do so.

## **10. 'Dual registered' pupils**

Where a pupil is on roll at the school and starts to attend a Learning Centre (LC) or equivalent provision, the chronology and other relevant information in the child protection file should be copied and passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual pupils, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that pupil.

## **11. Retention of records**

- 11.1 The school should retain the record for as long as the pupil remains in school and then transferred as described above.
- 11.2 Guidance from the Records Management Society is that when a pupil with a child protection record reaches statutory school leaving age (or where the pupil completed 6th form studies), the last school attended should keep the child protection file until the pupil's 25th birthday. It should then be shredded (and a record kept of this having been done, date, and why).

## **12. Electronic child protection records**

- 12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.
- 12.2 They should be in the same format as paper records (i.e. with well-maintained chronologies etc.) so that they are up to date if/when printed, if necessary.
- 12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place (such as CPOMS share, CJSM, GCSX or IronPort) but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

## **13. Sharing information with Further Education (FE) Colleges**

- 13.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year they will send to secondary school DSLs a list of newly enrolled students who have previously attended the school, requesting any relevant information. Secondary school DSLs will use their professional judgement but should always disclose if a young person is in care/looked after, is or has been subject of a child protection plan or is assessed as posing a risk to themselves or other students.
- 13.2 Note this applies only to schools and FE Colleges with whom the protocol has been agreed.



## Appendix 5 Levels of training

The following information outlines staff groups and the levels of training appropriate to them – these descriptions may vary between authority areas, but the basic principles apply.

Level	Description of staff group	Appropriate training
Level 1	All staff working in settings who may be in infrequent contact with children, young people and/or parents and carers who may become aware of possible abuse or neglect.	Single agency basic awareness training delivered within own organisation as face to face training or e-learning.
Level 2	All staff who work directly and on a regular basis with children or young people and where their role requires them to understand the multi-agency context of child protection work. Or staff who work with adults who have parent / carer responsibilities.	Up to and including Foundation level multi-agency training.
Level 3	Practitioners and managers with a specific safeguarding role: Designated Safeguarding Leads, operational managers with child protection responsibilities in assessing, planning, intervening and evaluation of the needs of a child or young person.	Up to and including Advanced level multi-agency training.

### **The role of the Safeguarding Governor**

This role is explained more fully in the 2 partner documents:

- i. **The role of the Safeguarding link governor in DSAMAT**
- ii. **Diocese of St. Albans Multi Academy Trust Approach to Safeguarding 2023/24**

Key to the role is to ensure safeguarding is always a priority by:

- Championing child protection issues within the school so that a strong safeguarding culture is maintained in the school.
- Ensure that the Local Authority Annual Academy Safeguarding Audit return is completed and any actions reported back to the LGB and monitored.
- Ensure that actions following the annual Trust safeguarding healthcheck are completed.
- Ensure the DfE ‘Filtering and Monitoring standards’ are met.
- Ensuring that all LGB members understand and comply with their statutory duty to provide the services of the school in a way that safeguards and promotes the welfare of pupils.

### **The role of the Audit and Risk Committee of the Board of Directors**

- Championing child protection issues within the DSAMAT and liaising with the DSAMAT appointed Professional Lead for Safeguarding.
- Ensuring the Child Protection policy is checked for impact and reviewed annually accordingly
- Strategically review the culture of safeguarding (including ‘Filtering and Monitoring’ and online safety) within each academy.

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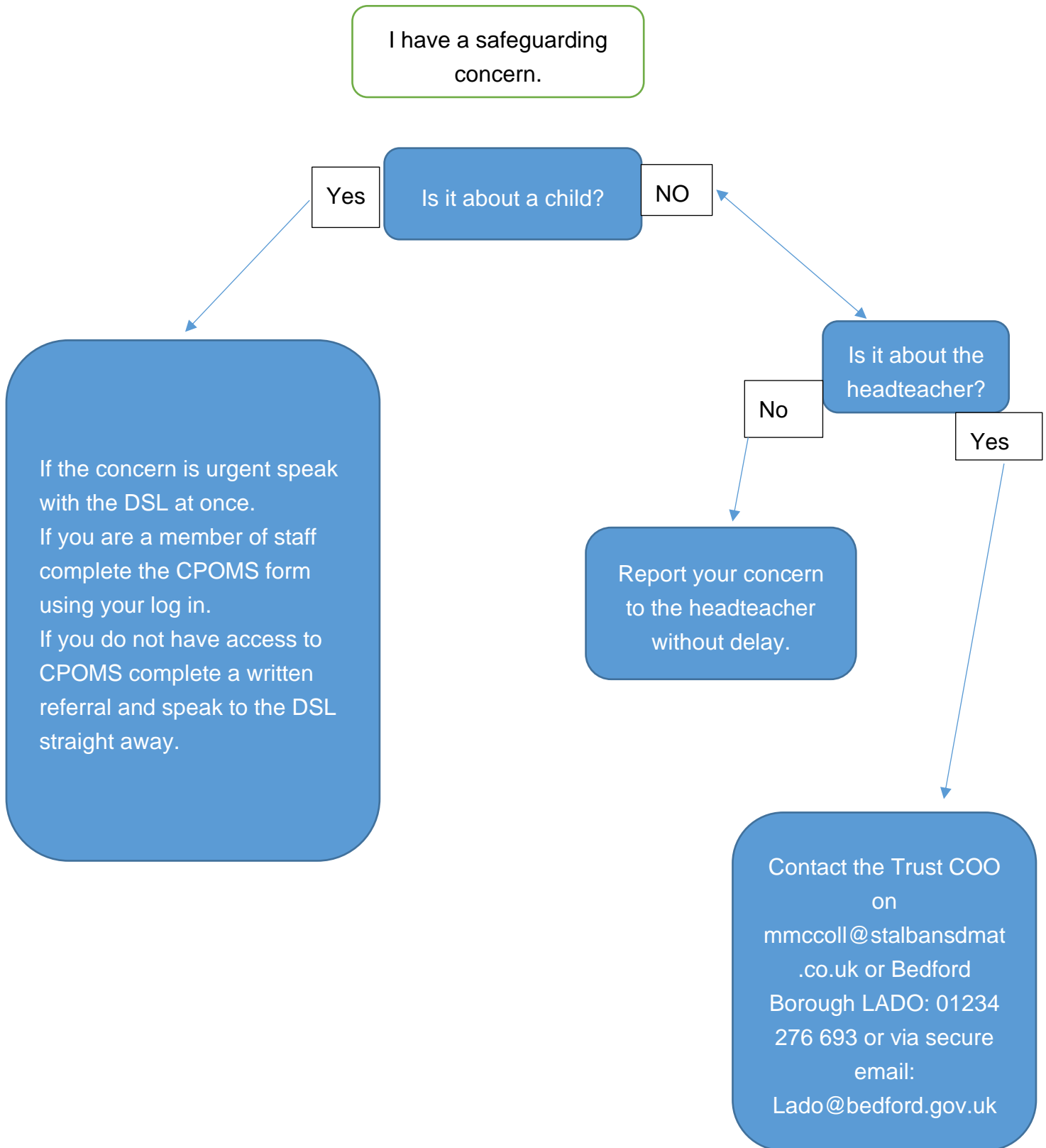


- Ensuring that all Board members understand and comply with their statutory duty to provide the services of the school in a way that safeguards and promotes the welfare of pupils.



## Appendix 6

### Flow diagram for reporting concerns at St James' CE Primary School



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