

Child Protection and Safeguarding Policy

Ashfield Valley Primary School



Together Everyone Achieves More

Approved by: Full Governing Body

Date: February 2019

Last reviewed on: March 2020

Next review due by: March 2021

Contents

1. Aims	3
2. Legislation and statutory guidance	3
3. Definitions.....	3
4. Equality statement.....	4
5. Roles and responsibilities	4
6. Confidentiality.....	6
7. Recognising abuse and taking action.....	6
8. Notifying parents.....	12
9. Pupils with special educational needs and disabilities	12
10. Mobile phones and cameras	12
11. Complaints and concerns about school safeguarding policies	12
12. Record-keeping	13
13. Training	14
14. Monitoring arrangements.....	15
15. Links with other policies	15
Appendix 1: Types of abuse	16
Appendix 2: Safer recruitment and DBS checks – policy and procedures.....	17
Appendix 3: Allegations of abuse made against staff.....	20
Appendix 4: Specific safeguarding issues.....	24
Appendix 5: School Child Protection Procedures	32
Appendix 6: Talking and Listening to Children	37

Key Contacts:

Designated Safeguarding Lead: Mrs. H Edge, Headteacher (head@ashfieldvalley.co.uk)

Deputy Designated Safeguarding Leads: Mrs. M McKenzie, Deputy Headteacher

Mrs. Rachel Patterson, Inclusion Lead

Link Governor for Safeguarding: Mrs. Shabana Anwar

Chair of Governors: Mrs. Shabana Anwar

School contact details: office@ashfieldvalley.co.uk, 01706 522 758

Local Authority Designated Officer (LADO): lado@rochdale.gov.uk, 01706 925365

Education Safeguarding Officer: Claire Heap: claire.heap@rochdale.gov.uk, 01706 925179

Education Welfare Service: 01706 925115

Early Help and Safeguarding Hub (EHASH): ehash@rochdale.gov.uk, 0300 303 0440

Out of Hours Emergency Duty Social Work Team: 0300 303 8875

Safeguarding Unit: 0300 303 0350

Police Protection and Investigation Unit (PPIU): 0161 856 4810 (CP), 0161 856 8757 (DV)

NSPCC Whistleblowing Helpline: 0800 028 0285

1. Aims

At Ashfield Valley we recognise that safeguarding and promoting the welfare of children is everybody's responsibility and that the best interests of the child are paramount. As everyone who comes into contact with children and their families has a vital role to play, this policy has been developed to provide a shared understanding of expectations.

Our school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly trained in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2019\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#).

We comply with this guidance and the arrangements agreed and published by our local safeguarding partners, including the Greater Manchester multi-agency safeguarding procedures <https://www.rbscb.org/professionals/multi-agency-procedures/> and the Rochdale Childrens Needs and Responses Framework

<https://www.rbscb.org/UserFiles/Docs/Procedure/CN%20and%20RF%20Jan%202018.pdf>

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).

3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sexting (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children

Children includes everyone under the age of 18.

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The local authority (LA)
- A clinical commissioning group for an area within the LA
- The chief officer of police for a police area in the LA area

4. Equality statement

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

We give special consideration to children who:

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

5. Roles and responsibilities

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

5.1 All staff

At Ashfield Valley, we ensure that staff read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct (Guidance for Safe Working Practice) the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education

- The Early Help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment of needs
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific contextual safeguarding issues, such as child sexual exploitation (CSE), FGM, radicalisation and County Lines.

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is **Mrs. Heather Edge, Headteacher**. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, **Mrs. Michele McKenzie, Deputy Headteacher** will act as cover as in the first instance and, if she is not available, then **Mrs Rachel Patterson, Inclusion Lead**.

If the DSL and deputies are not available, a member of the Welfare Team will act as cover (for example, during out-of-hours/out-of-term activities).

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

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

The DSL will also liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

The Headteacher, who is the DSL, is also the person responsible for Cared for Children

5.3 The Governing Board

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

The Governing Board will appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The link governor will meet on a termly basis with the DSL to monitor the effectiveness of this policy and its implementation.

At Ashfield Valley this is Mrs Shabana Anwar.

The Chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education. All governors will receive safeguarding updates and the termly Headteacher's report to governor will include a safeguarding section.

5.4 The Headteacher

The Headteacher is responsible for the implementation of this policy by:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

Ensuring that school provides a broad and balanced curriculum which helps children recognise when they are at risk and how to get help when they need it.

- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

6. Confidentiality

Our school recognises that timely information sharing is essential to effective safeguarding and staff are informed that fears about appropriate sharing of information must never stand in the way of the need to promote the welfare, and protect the safety of children. Our staff are aware that they can never promise a child that they will not tell anyone about a report of abuse and that they have a professional responsibility to pass on concerns about a child to the DSL.

School handles personal information about children in line with the provisions of the Data Protection Act (DPA) 2018 and GDPR however, we are clear that this legislation does not prevent or limit the sharing of information for the purposes of keeping children safe.

School follows the DfE information sharing advice for safeguarding practitioners

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/721581/information_sharing_advice_practitioners_safeguarding_services.pdf

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. See Appendices 5 and 6 for further detail.

7.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Speak to the DSL/ deputy DSL at school **immediately**, in person.

In the event that the DSL/ deputy DSLs are unavailable, make a multi agency referral **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Referrals should be made in the first instance by telephone to the Complex Early Help and Safeguarding Hub (EHASH) on 0300 303 0440. Advice will then be provided in respect of whether it is appropriate for the referrer to submit a multi-agency referral form (MARF).

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Never promise to keep it a secret
- Speak to the DSL
- Record the disclosure as soon as possible, using the child's own words. Stick to the facts, and do not put your own judgement on it
- Record the incident on CPOMS and notify the DSL. As outlined above, in the event of immediate risk of significant harm where no DSL is available, make a referral to children's social care directly (see 7.1), and tell the DSL as soon as possible that you have done so

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

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

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.

Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils. Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

Figure 1 illustrates the procedure to follow if you have any concerns about a child's welfare, where there is no risk of immediate danger.

Early Help

Our school believes that Early Help is fundamental to making a difference to the lives of the children in our care and the families that we serve. Early Help is about helping children, young people and families to deal with any issues as early as possible, before they become big problems. We understand that many families go through times which can often make balancing school and home-life difficult. Often, these times can have an impact on emotional welfare of children. At Ashfield Valley, we offer many different pathways of support, which we hope will help to remove any barriers that a family may encounter during a child's life at school. We have an experienced **Welfare Team**, consisting of the Headteacher as Designated Safeguarding Lead; the Deputy Headteacher as Deputy Safeguarding Lead; the SENDCO; the Inclusion Lead and the Mental Health Lead. The Welfare Team meet regularly to review the school's current caseload and the impact of actions.

If Early Help is appropriate, the Welfare Team will liaise with other agencies and professionals to set up a meeting to undertake an early help assessment. School staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Referral

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

EHASH will assess referrals against the Children's Needs and Responses Framework and will advise what course of action to take. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded. At Ashfield Valley, we record information about children on CPOMS.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow the Greater Manchester escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

7.5 If you have concerns about extremism

If a child is not suffering or likely to suffer from harm, or in immediate danger, where possible speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

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

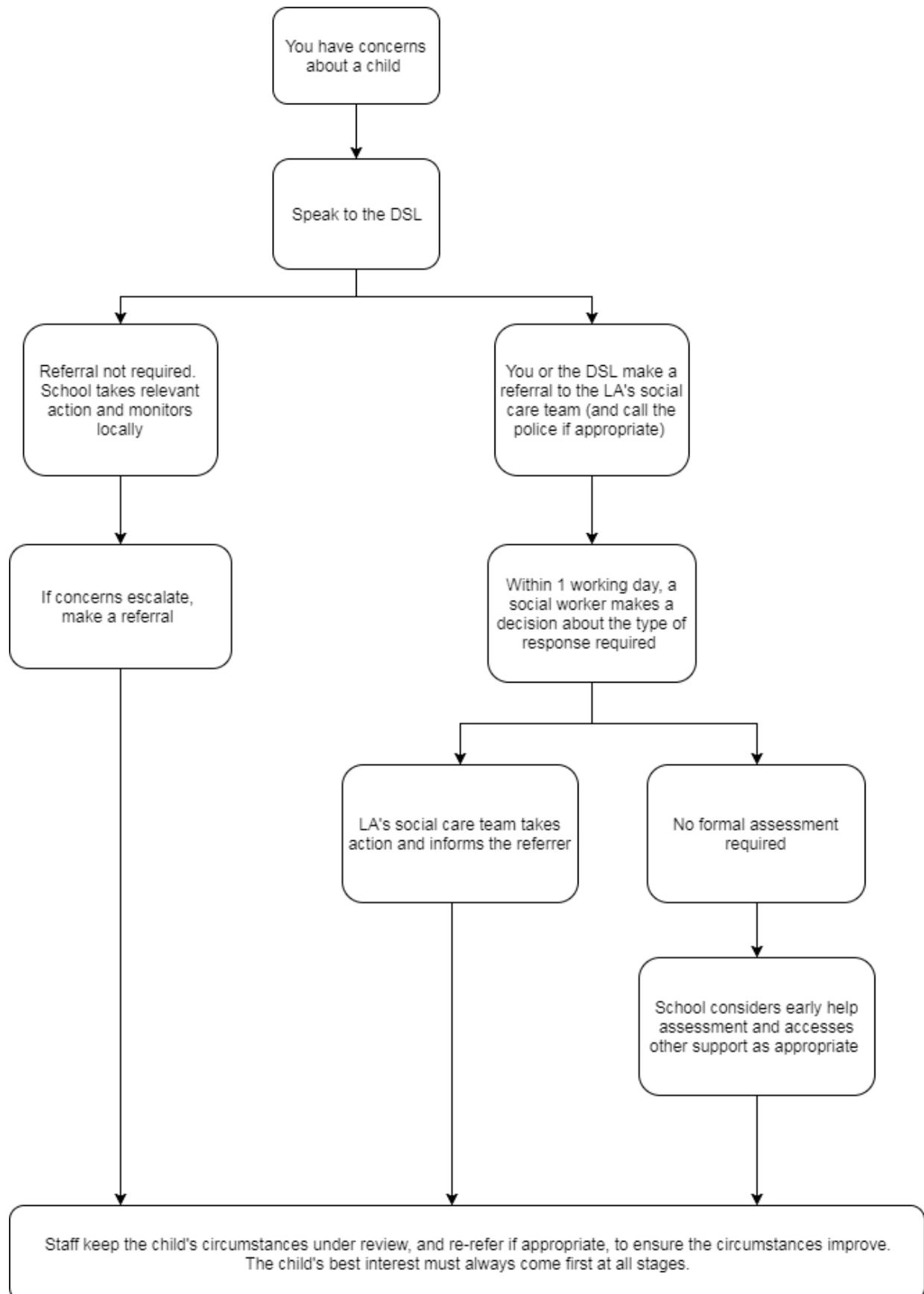
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

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

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do.)



7.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the Headteacher.

If the concerns/allegations are about the headteacher, speak to the Chair of Governors.

The Headteacher/Chair of Governors will then follow the procedures set out in appendix 3.

Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

7.7 Allegations of abuse made against other pupils (Peer on Peer Abuse)

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

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

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

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

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

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

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

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

7.8 Sexting

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

You must **not**:

- View, download or share the imagery yourself, or ask a pupil to share or download it. If you have already viewed the imagery by accident, you must report this to the DSL
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff.

This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done via referral to EHASH, or through contacting Police directly via 101.

Recording incidents

All sexting incidents and the decisions made in responding to them will be recorded on CPOMS. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

Curriculum coverage

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing programmes. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
- Issues of legality
- The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:

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

8. Notifying parents

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

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

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

9. Pupils with special educational needs and disabilities

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

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

We offer extra pastoral support for pupils with SEN and disabilities. This includes:

- Support from the Inclusion Lead
- Interventions such as Lego Therapy, Dominoes (art therapy), friendship groups

10. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones are to remain in their bags or cupboards during contact time with pupils and care must be taken to secure personal devices so that children are unable to access them.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

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

Please see also the policy on use of mobile phones in school.

11. Complaints and concerns

11.1 Complaints against staff

Complaints against staff will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

11.2 Other complaints

If parents, carers or other individuals wish to raise a complaint with school, they will be directed to do so via the school complaints procedure. The school will deal with all complaints seriously.

Early years providers should take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.74).

11.3 Whistle-blowing

All staff are made aware of their professional duty to raise concerns in relation to safeguarding, which may include the attitudes or actions of colleagues.

We have a whistleblowing procedure, which outlines how anyone who makes a 'protected disclosure' is protected from being treated unfairly or being dismissed. This procedure is shared with all staff in their Induction and reminders are issued on an annual basis as part of safeguarding training.

Early years providers should also note the requirements set out in paragraph 3.75 of the statutory framework for the Early Years Foundation Stage (page 33).

2. Record-keeping

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

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

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file, in an envelope marked confidential, addressed to the DSL. (See RBC's Child Protection Information Sharing at Transition Protocol.) In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

When the children move onto a new school (such as high school) and a request for sharing information is sent, the DSL checks the request against information held in school as to the school which the child has moved. Only after internal checks have been completed will the DSL release the information to the school requesting it. Only the DSL can complete this action.

Ashfield Valley uses the secure online system CPOMS for recording concerns. All staff are issued with a personal login and password, which they must keep secure. The Welfare Team in school have access to the full CPOMS systems. Other records are protected through restricted access. Information is only passed on when the DSL determines it to be necessary. All other information is distributed internally on a need-to-know basis.

See CPOMS guidance for information about recording incidents.

Records should include:

- copies of letters
- reports, including medical reports
- details of telephone conversations
- details of contact with parents

Careful note should be made of dates, times, and members of staff involved. Records should be kept objective and should contain relevant and factual information. See Appendices 5 and 6 for further details. Records are kept separately from academic records, in the headteacher's office. Information is shared with other staff on a 'need to know' basis via CPOMS. Other concerns, referrals and documents are kept on the Z drive – a confidential drive accessed only by members of the Welfare Team.

Information is shared with external agencies as appropriate. This is either in person with a member of the Welfare Team relaying the information or, when requested, a copy of the child's CPOMS chronology is sent securely to the person requesting it, e.g. social worker.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

13. Training

13.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. Staff will also read and understand the document, 'Safer Working Practice for Adults Working with Children and Young People.'

Training will be regularly updated and the content of the training will be in line with advice from local safeguarding partners.

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

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

13.2 The DSL and Deputies (Heather Edge, Michele McKenzie and Rachel Patterson)

The Designated Safeguarding Lead and Deputies are required to attend the RBSCB multi agency training "Working Together to Safeguard Children." They will attend refresher advanced safeguarding training either via the Education Safeguarding Officer or RBSCB at least annually.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

All DSL and DDSL have received the LA DSL training and will refresh this annually.

The school offers training for other members of the Welfare Team.

13.3 Governors

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

As the Chair of Governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, they will attend training in managing allegations for this purpose.

13.4 Recruitment – interview panels

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

14. Monitoring arrangements

This policy will be reviewed **annually** by **Heather Edge, Headteacher**. At every review, it will be approved by the full governing board.

15. Links with other policies

This policy links to the following policies and procedures:

- Behaviour Policy
- Anti-Bullying Policy
- Staff Code of Conduct (Guidance for Safe Working Practice)
- Complaints Policy
- Health and Safety Policy
- Attendance Policy
- Equality Policy
- Sex and Relationship Education
- First Aid
- Privacy notices
- Whistleblowing Policy
- Mobile phone policy
- E-safety policy
- Intimate Care policy

Appendices 1-3 and parts of appendix 4 are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

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

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

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

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

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

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

New staff

When appointing new staff, we will:

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

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

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

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

Regulated activity means a person who will be:

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

Existing staff

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

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

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

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

Agency and third-party staff

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

Contractors

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

This will be:

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 3: allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

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

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

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

Suspension

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

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

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

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

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

- Immediately discuss the allegation with the designated officer at the local authority (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. All staff are encouraged to speak to their trade union representative in the first instance. As the Headteacher is the DSL and investigates initially, the Deputy Headteacher or member of the Welfare Team provide emotional support to the member of staff or they may choose another member of staff to support them emotionally. All members of staff involved are made aware of the counselling service, which can be provided through the Local Authority.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

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

Record-keeping

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

Such records will include:

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

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

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other

records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

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

Learning lessons

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

This will include consideration of (as applicable):

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

Appendix 4: specific safeguarding issues

Domestic Abuse

As part of Ashfield Valley Primary School's commitment to keeping children safe, we are part of **Operation Encompass**.

Operation Encompass is a Police and Education early intervention safeguarding partnership which supports children and young people exposed to domestic abuse.

Being part of Encompass means that our school will receive a notification from GM Police before the start of the next school day when a child or young person has been involved in or exposed to a domestic abuse incident the previous day. The information is given to the school's Key Adult who will arrange support as appropriate for the child.

Children missing from education

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk

. These include children who:

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

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

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

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

The school will make every reasonable effort to obtain multiple emergency contact numbers for all children and will follow Rochdale Council CME guidance which outlines Rochdale Borough Council's systems for identifying and maintaining contact with children missing from education and the steps taken to identify those at risk

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/550416/Children_Missing_Education_-_statutory_guidance.pdf

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship. If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

School may seek advice and support from the specialist Sunrise CSE team in Rochdale.

<http://www.thesunriseteam.co.uk/>

Homelessness

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

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

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

Gender based violence

In 2016, the government launched the "Violence against Women and Girls" strategy. This promotes a vision of eliminating violence against women and girls. New legislation has been put in place, including specific offences of

- Coercive or controlling behaviour in an intimate or family relationship
- Stalking
- Forced marriage
- Failure to protect from FGM
- Revenge pornography

The impact of violence against women and girls is very high. Experiences of abuse can result in multiple disadvantage, chaotic lifestyles, substance abuse, homelessness, offending behaviour, mental health problems. 41% of the prison population in 2016 had witnessed or experienced domestic abuse, illustrating the wider social harms caused by these crimes.

The school aims to promote equality and respect at all levels in the school community, for example through

- Behaviour and Discipline and Anti-Bullying policies
- Social inclusion support

- PSHE curriculum
- Assemblies
- Staff code of conduct
- School council
- Promotion of safeguarding awareness
- Promotion of Childline contact numbers
- NSPCC "Speak out stay safe" workshops

Children who experience domestic abuse are supported sensitively by school staff. The DSL will refer families for support through Early Help.

So-called 'honour-based' violence (including FGM and forced marriage)

So-called 'honour-based' violence (HBV) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

All forms of HBV are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBV or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
 - Having a mother, older sibling or cousin who has undergone FGM
 - Having limited level of integration within UK society

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

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

Forced marriage

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

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

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

The DSL will:

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

Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. Staff will be alert to changes in pupils’ behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff should **always** take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the Prevent Policy.

Child criminal exploitation (CCE) and County Lines

County Lines is the term used to describe the internal trafficking of children for exploitation. Children trafficked in this way are used by gangs to commit crime on their behalf and as a result are often dealt with by the criminal justice system rather than being recognised as victims and safeguarded. Child criminal exploitation (CCE) can expose victims to injuries, trauma, sexual violence, debt bondage and danger. The arranging or facilitating of the travel of children (and vulnerable adults) for the purpose of them selling drugs, firearms or sex on their behalf is exploitation and can fall under the Modern Slavery Act's definitions of exploitation.

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate. In cases of human trafficking, it may also be appropriate to make a referral to the National Referral Mechanism (NRM)

Private fostering

A private fostering arrangement is one that is made 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. The legislation governing private fostering is the 'Children (Private Arrangements for Fostering) Regulations 2005'

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg. to stay at the same school to finish exams)
- teenagers estranged from their families

There may also be private foster care arrangements for the following reasons;

- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families
- trafficked children

Current arrangements for the regulation of private fostering originate from concern following the death of Victoria Climbié in 2000. Victoria was privately fostered by her great aunt. Arrangements were codified in the Children Act 2004. Following this, the Children (Private Arrangement for Fostering) Regulations 2005 set out the duties of local authorities in their arrangements for private fostering, and national minimum standards for local authorities were published in 2005.

Given the 'hidden' nature of much private fostering, local authorities have a duty to raise awareness of the need to notify the local Children's Services department and schools have a vital role within this, as the people who see children and families on a day to day basis.

Further information is available at:

[https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children Act 1989 private fostering.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/274414/Children_Act_1989_private_fostering.pdf)

Checking the identity and suitability of visitors

All visitors will be required to verify their identity and to ensure their belongings, including their mobile phone(s) are kept in a safe place during their visit.

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

Visitors are expected to sign in using the school system and wear a visitor's lanyard.

Visitors to the school who are visiting for a professional purpose will be asked to show photo ID.

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

School staff are trained that they should politely challenge any unaccompanied adults who they encounter inside the school building/ grounds, to ascertain the reason for their visit and if appropriate, accompany them.

Non-collection of children

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

- Contact the named person on the contact sheet located in the office. This is known in school as the approved list.
- If contact is made, staff will ask why the child/ren have not been collected and ask when someone will be coming to collect the child/ren. The person collecting the child/ren will be checked against the approved list.
- If no contact is made, the member of staff will contact a member of the SLT if they are not already involved.
- If no further contact can be made, after 45 minutes (4pm) a member of the Welfare Team will call the police on 101 and ask for a welfare call to be made and EHASH will be contacted for further advice.

Using interpreters

Bilingual members of staff are available to translate for parents as needed. Where an interpreter is used, the same member of staff should be used for each conversation with a given parent, wherever possible. The name of the interpreter should be noted in the records.

Local Authority concerns

The LA operates a "ring round" warning system. When a warning is received, the headteacher should be informed. The headteacher (or administrator in her absence) will send a confidential message to staff.

Guidance on dealing with children who have wet or soiled themselves

Children are encouraged to tell staff if they have wet or soiled themselves.

Foundation Stage Unit

Children who have wet or soiled themselves should be encouraged to remove wet or soiled clothes themselves, and to wipe themselves if possible. If necessary, staff will assist. Wherever possible, two members of staff should supervise a child who needs to be washed/changed.

Whole School

Children who have wet or soiled themselves should be encouraged to remove wet or soiled clothes themselves, and to wipe themselves if possible, and to change themselves if clean clothes are available in school. If these things are not possible, parents should be contacted and asked to collect the child, take the child home, change the child and return the child to school. If parents cannot be contacted, the child may be washed/changed in the Foundation Stage bathroom. An additional adult should be present wherever possible.

Keeping children safe after school – 'Safe after School' Campaign

The 'Safe after School' campaign was launched to support parents with advice and guidance on out of school activities.

Clubs, classes and tutorial sessions offer ways for children and young people to develop their skills and confidence, but it comes as quite a shock to many parents that where they send their child to may not actually be regulated. Even people who have committed criminal offences can legally continue to work in roles that include interaction with children. There have been many instances, nationally as well as locally, about inappropriate behaviour and abuse perpetrated by adults in a position of trust as an outside or after school activity.

If children make disclosures regarding unregulated activities then safeguarding procedures are followed. This may involve contacting the police and taking advice from EHASH.

Appendix 5: School Child Protection Procedures

1. What Should Staff/Volunteers Do If They Have Concerns About A Child or Young Person in School?

Education professionals who are concerned about a child's welfare or who believe that a child is or may be at risk of abuse should pass any information to the Designated Safeguarding Lead (DSL) in school; this should *always* occur as soon as possible and certainly within 24 hours.

The Designated Safeguarding Lead is **Heather Edge, Headteacher** and the Deputy Designated Safeguarding Leads are **Michele McKenzie, Deputy Headteacher** and **Rachel Patterson, Inclusion Lead**. It is these senior colleagues who are responsible for taking action where the welfare or safety of children or young people is concerned. If staff are uncertain about whether their concerns are indeed Child Protection then a discussion with their DSL will assist in determining the most appropriate next course of action.

Detailed information on possible signs and symptoms of abuse can be found at www.rbscb.org in the Rochdale Borough Multi-Agency Safeguarding Children procedures.

Staff should never:

- Do nothing/assume that another agency or professional will act or is acting.
- Attempt to resolve the matter themselves.

2. What should the DSL consider right at the outset?

- Is this a concern or an immediate risk of harm? Staff refer to Children's Needs and Response Framework. Am I dealing with 'risk' or 'need'? (By definition, a child at risk is also a child in need. However, what is the *priority / level and immediacy* of risk / need and consider the Children's Needs and Response Framework?)
- Can the level of need identified be met:
 - In or by the school or by accessing universal services/without referral to the EHASH or other targeted services?
 - By working with the child, parents and colleagues?
 - By completion of a Early Help Assessment (EHA) with parents/carers/child & other professionals
- What resources are available to me/the school and what are their limitations?
- Is the level of need such that a referral needs to be made to the Early Help and Safeguarding Hub (EHASH) requesting that an assessment of need be undertaken? (**Child in Need referral**)
- Is the level and/or likelihood of risk immediate and such that a Child Protection referral needs to be made (i.e. a child is suffering or is at risk of suffering significant harm? (**Child Protection referral**))
- What information is available to me: Child, Parents, Family & Environment?
- What information is inaccessible and, potentially, how significant might this be?
- Who do/don't I need to speak to now and what do they need to know?
- Where can I access appropriate advice and/or support?
- If I am not going to refer, then what action am I going to take? (e.g. time-limited monitoring plan, discussion with parents or other professionals, recording, etc.)

3. Feedback to Staff Who Report Concerns to the Designated Safeguarding Lead

The Designated Safeguarding Lead will decide which information needs to be shared, when and with whom. The primary purpose of confidentiality in this context is to safeguard and promote the child's welfare but to also give assurances to the person reporting their concerns that the DSL has, in turn, followed procedures.

4. Thresholds for Referral to the Early Help and Safeguarding Hub (EHASH)

Where a Designated Safeguarding Lead or line manager considers that a referral to the EHASH may be required, there are two thresholds for (and their criteria) and types of referral that need to be carefully considered:

(i) Is this a Child In Need?

Under section 17 (s.17(10)) of the Children Act 1989, a child is in need if:

- (a) S/he is unlikely to achieve or maintain, or to have the opportunity to achieve or maintain, a reasonable standard of health or development, without the provision of services by a local authority;
- (b) His/her health or development is likely to be impaired, or further impaired, without the provision of such services;
- (c) S/he has a disability

(ii) Is this a Child Protection Matter?

Under section 47(1) of the Children Act 1989, a local authority has a duty to make enquiries where they are informed that a child who lives or is found in their area:

- (a) is the subject of an Emergency Protection Order;
- (b) is in Police Protection; or where they have
- (c) there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm.

Therefore, it is the 'significant harm' threshold that justifies statutory intervention into family life. A professional making a Child Protection referral under s.47 must therefore provide information which clearly outlines that a child is suffering or is likely to suffer significant harm and can evidence this.

The Designated Safeguarding Lead will make judgements around 'significant harm', levels of need and when to refer using the Children's Needs and Response Framework and ensure that if the child has an open Early Help Assessment, that this information is attached as part of the referral to EHASH.

5. Making Referrals to the EHASH (Guidance for the Designated Safeguarding Lead)

(i) Child In Need/Section 17 Referrals

The DSL should look with other services as part of the Early Help Strategy to complete an Early Help Assessment (EHA).

This is a request for assessment/support/services and, as such, you **must obtain the consent** of the parent(s) (and child/young person where appropriate), this should be identified on the EHA.

Where a parent/child/young person refuses to consent, you should make clear your on-going plans and responsibilities in respect of support, monitoring etc., and the possibility of a Child Protection referral at some point in future if things deteriorate or do not improve. (This is not about threats or saying that this is inevitable but about openness and transparency in dealings with parents).

(ii) Child Protection

Use the multi-agency referral form (MARF found at www.rbscb.org) for referrals to the Early Help and Safeguarding Hub where it is considered that a child may be at risk of or suffering significant harm. If an EHA is in place then this information must form part of the referral and the DSL completes the front sheet of the multi-agency referral form.

- You **do not require the consent** of a parent or child/young person to make a Child Protection referral
- A parent should, **under most circumstances, be informed** by the referrer that a Child Protection referral is to be made.
- The criteria for not informing parents are:
 - (a) Because this would increase the risk of significant harm to a child(ren), to another member in the family home or to a professional; or
 - (b) Because, in the referrer's professional opinion, to do so might impede a criminal investigation that may need to be undertaken;
 - (c) Because there would be an undue delay caused by seeking consent which would not serve the child's best interests.

See the Rochdale Borough Multi-Agency Safeguarding Children procedures on the RBSCB website for the occasions when parents/carers should not be informed.

Fear of jeopardising a hard won relationship with parents because of a need to refer is **not** sufficient justification for not telling them that you need to refer.

To the contrary, this lack of openness will do little to foster on-going trust, particularly as the source of referrals will be disclosed to parents except in a limited number of circumstances.

If you feel that your own or another adult's immediate safety would be placed at risk by informing parents then you should seek advice and/or make this clear on the referral or in any telephone contact with the Early Help and Safeguarding Hub.

5. The EHASH Responses to Referrals and Timescales

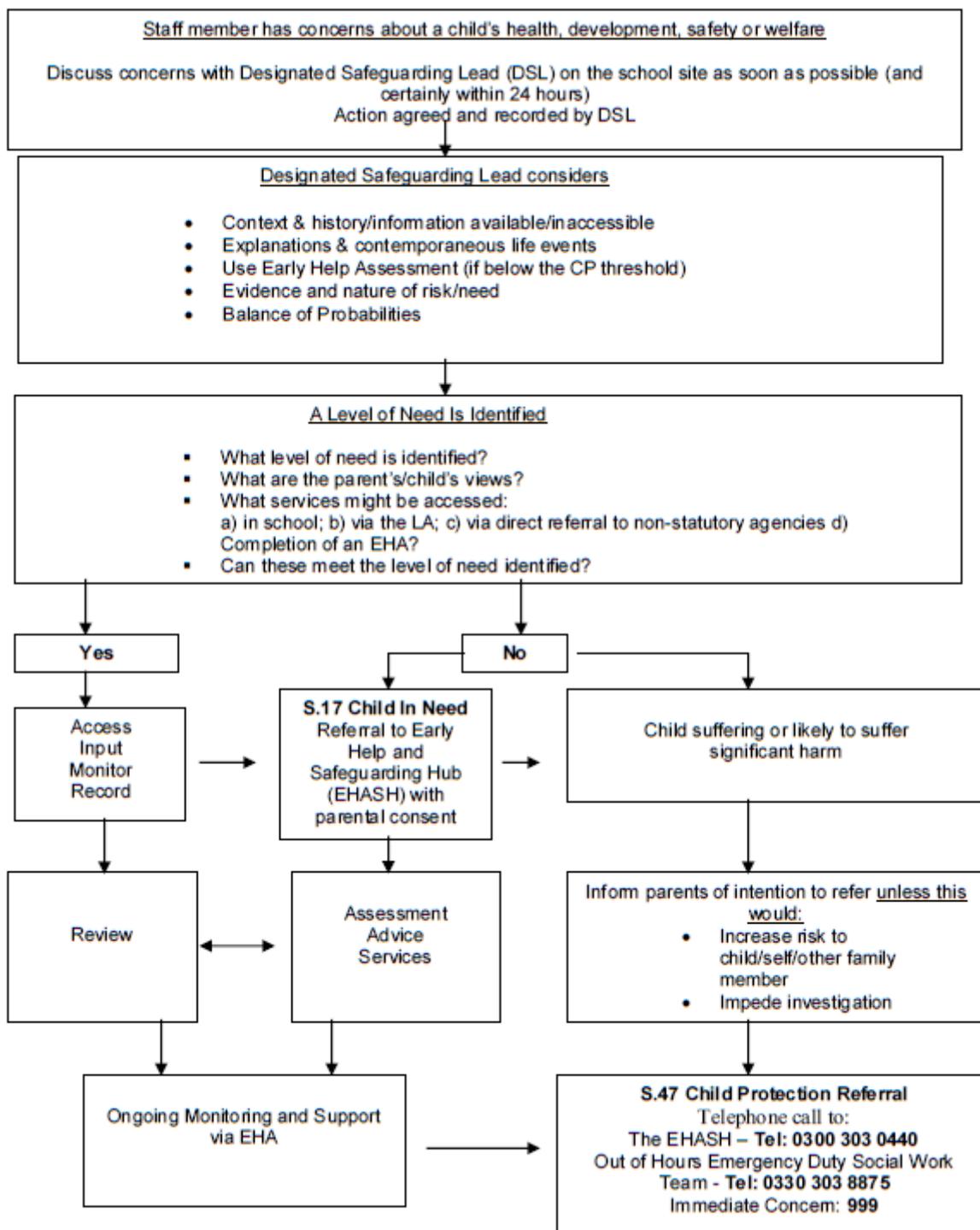
In response to a referral, the EHASH may decide to:

- Provide advice to the referrer and/or child/family
- Refer to Early Help services
- Undertake an Assessment or request an assessment from a single agency
- Convene a Strategy Meeting for referrals under Section 47 of the Children Act
- Provide support services under Section 17
- Convene an Initial Child Protection Conference
- Accommodate the child under Section 20 (with parental consent)
- Make an application to court for an Order

6. Feedback from the EHASH

The EHASH has 24 hours within which to make a decision about a course of action in response to a referral. If you do not receive any (same day) verbal feedback following an urgent Child Protection referral, and where this places school/college/a child(ren) in a vulnerable position, you should ask to speak to the relevant Team Manager at EHASH (0300 303 0440) or the Education Safeguarding Officer (01706 925384)

Taking action on child welfare/protection concerns in school:



Appendix 6: Talking and Listening to Children

If a child wants to confide in you, you **should**:

- Be accessible and receptive
- Listen carefully and uncritically, at the child's pace
- Take what is said seriously
- Reassure children that they are right to tell
- Tell the child that you must share the information
- Make sure that the child is ok
- Make a careful record of what was said (see *Recording*)

You **should never**:

- Investigate or seek to prove or disprove possible abuse
- Investigate, suggest or probe for information
- Ask leading questions of children/young people
- Confront another person (adult or child) allegedly involved
- Speculate or accuse anybody
- Make promises about confidentiality or keeping 'secrets'
- Assume that someone else will take the necessary action
- Jump to conclusions, be dismissive or react with shock, anger, horror, etc.
- Offer opinions about what is being said or the persons allegedly involved
- Forget to record what you have been told
- Fail to share the information with the correct person (the Designated Safeguarding Lead).

Children with communication difficulties, or who use alternative/augmentative communication systems:

- Whilst extra care may be needed to ensure that signs of abuse and neglect are interpreted correctly, any suspicions should be reported in exactly the same manner as for other children
- Opinion and interpretation will be crucial (be prepared to be asked about the basis for it and to possibly have its validity questioned if the matter goes to court)

Recordings should:

- State who was present, time, date and place (using full names and full job designations of staff)
- Be recorded on CPOMS
- Be passed to a DSL immediately (certainly within 24 hours)
- Use the child's words wherever possible
- Be factual/state exactly what was said
- Differentiate clearly between fact, opinion, interpretation, observation and/or allegation

What information do you need to obtain?

- School staff have **no investigative role** in Child Protection (Police and Children's Social Care will investigate possible abuse very thoroughly and in great detail, they will gather evidence and test hypotheses)

- Never prompt or probe for information, your job is to listen, record and share information
- Ideally, you should be clear about what is being said in terms of **who, what, where and when**
- The question which you should be able to answer at the end of the listening process is 'might this be a Child Protection matter?'
- If the answer is yes, or if you are uncertain, record and share immediately with the Designated Safeguarding Lead

If you do need to ask questions, what is and isn't OK?

- **Never** asked closed questions i.e. ones which children can answer yes or no to e.g. did he touch you?
- **Never** make suggestions about who, how or where someone is alleged to have touched, hit, etc. e.g. top or bottom, front or back?
- If we must, use only '**minimal prompts**' such as 'go on ... tell me more about that ... tell me everything that you remember about that...'
- Timescales are very important: 'when was the last time this happened?' is an important question.

What else should we think about in relation to disclosure?

- Is there a place in school which is particularly suitable for listening to children e.g. not too isolated, easily supervised, quiet, etc.
- We need to think carefully about our own body language – how we present will dictate how comfortable a child feels in telling us about something which may be extremely frightening, difficult and personal
- Be prepared to answer the 'what happens next' question
- We should never make face-value judgements or assumptions about individual children. For example, we 'know that [child.....] tells lies'
- Think about how you might react if a child did approach you in school. We need to be prepared to offer a child in this position exactly what they need in terms of protection, reassurance, calmness and objectivity.