

PRIDE IN EXCELLENCE

## EARLY HELP AND SAFEGUARDING POLICY

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4

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## EARLY HELP AND SAFEGUARDING POLICY

### Safeguarding team details

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**Designated Safeguarding Lead**

Mrs Forde

In her absence, the deputy DSLs are Mr Griffin, Miss Ellery and Mrs Beard.

Mrs Forde	Mr Griffin	Miss Ellery	Mrs Beard
			

Table of Contents	
Section	Page
<b>Purley Oaks Primary School’s Designated Safeguarding Leads (DSLs) and contacts</b>	1
<b>Introduction</b>	6
Aims	
<b>Key contacts</b>	7
<b>Roles and responsibilities</b>	9
All members of staff	
Designated Safeguarding Lead (DSL)	
The Headteacher	
The Governing Board	
Directorate	
Working with parents and carers	
Multi-Agency working	
<b>Types of abuse and neglect and specific safeguarding concerns</b>	15
Abuse	
Physical abuse	
Emotional abuse	
Sexual abuse	
Neglect abuse	
Bullying (Including online bullying)	
<b>Specific safeguarding issues</b>	21
Children Missing from Education (CME)	

<p>Child Sexual Exploitation (CSE)</p> <p>Female Genital Mutilation (FGM) and so-called ‘Honour Based’ Abuse (HBA)</p> <p>Forced marriage</p> <p>Preventing radicalisation</p> <p>Domestic Abuse and Sexual Violence, (DASV) including child on child abuse</p> <p>Harmful sexual behaviour, sexual violence and harassment</p> <p>Mental Health</p> <p>Child trafficking and modern slavery</p> <p>Private Fostering</p> <p>Ritualistic abuse</p> <p>Non-collection of children from school</p> <p>Young people at risk of gang activity and serious youth violence</p>	
<p><b>Early Help Procedures</b></p> <p>Stage One - Universal services for all children, young people and their families</p> <p>Stage Two - Targeted Early Help for vulnerable children and families</p> <p>Early Help assessment</p> <p>Team Around the Family</p> <p>Lead Professional</p>	32
<p><b>Child Protection Procedures</b></p> <p>Taking action</p> <p>If a child discloses information to a member of staff</p> <p>Notifying parents and gaining consent</p> <p>Referral to Croydon MASH/SPOC</p>	37

<p>Record keeping</p> <p>Transfer of information</p> <p>Attendance at case conferences and core groups</p> <p>Monitoring</p> <p>Confidentiality and sharing information</p> <p>Summary</p>	
<p><b>Education</b></p> <p>Online safety</p> <p>Filters and monitoring</p> <p>Staff training</p> <p>Information and support</p> <p>Relationships, Sex and Health Education (RSHE)</p>	43
<p><b>Safer recruitment (In reference to Keeping Children Safe in Education KCSIE)</b></p> <p>Recruitment, selection and pre-employment vetting</p> <p>Pre-appointment checks</p> <p>Single central record</p> <p>Allegations of abuse made against teachers and other staff</p> <p>Supply teachers</p> <p>Managing the situation and exit arrangements</p> <p>Specific actions</p> <p>Music tuition</p>	45

<p><b>Early Years settings within schools</b></p> <p>Legal and policy framework</p> <p>Safeguarding and Child Protection</p> <p>Suitable people</p> <p>Staff training, skills and supervision</p> <p>Staff ratios</p> <p>Health</p> <p>Health and safety and suitability of premises</p> <p>Additional procedures</p> <p>Managing behaviour</p> <p>Intimate care</p>	65
<p><b>Health and Safety Risk Assessments</b></p> <p>Responsibility for health and safety</p> <p>Risk assessments</p> <p>Working with aggressive and violent parents</p> <p>Site security and visitors</p> <p>Use of the school premises by other organisations</p> <p>Monitoring and review</p>	69
<p><b>Appendix A - Resources</b></p> <p>Cause for concern form and request for information form</p>	73
<p><b>Appendix B - Statutory guidance – regulated activity (children)</b></p>	76
<p><b>Appendix C - Relevant policies</b></p>	80
<p><b>Appendix D - Checklist</b></p>	81

## Introduction

This policy aims to provide all members of staff (paid and unpaid), children and young people, and their families with a clear and secure framework for ensuring that all children in the school are protected from harm, both while at school and when off the school's premises.

Purley Oaks Primary School believes that it is always unacceptable for a child or young person to experience abuse of any kind and recognises its responsibility to safeguard the welfare of all children and young people, by a commitment to practices that protects them.

Our school believes that safeguarding and promoting the welfare of children is everyone's responsibility. Every member of staff who encounters children and their families has a role to play in safeguarding children. In order to fulfil this responsibility, every member of staff is instructed to take a 'child-centred' approach, considering at all times what is in the **best interests of the child**.

All children, regardless of age, disability, sex, racial heritage, religious belief, sexual orientation or gender identity, have the right to equal protection from all types of harm or abuse. This policy applies to all children and young people.

Our school will ensure that all children are safeguarded by actively encouraging members of staff to work together proactively with children and families who may need help, and for this to happen as soon as possible so that children are protected from any further emotional and physical harm.

This policy has been written with reference to the following local and statutory guidance:

Guidance
<a href="#">Working together to safeguard children</a>
<a href="#">What to do if you're worried a child is being abused - Publications - GOV.UK</a>
<a href="#">The London Safeguarding Children Board Child Protection procedures</a> <a href="#">London Safeguarding Children Board: Child Protection Procedures</a>
<a href="#">Keeping children safe in education 2021 (publishing.service.gov.uk)</a>
CSCB local policies and procedures

### Aims

To ensure our school safeguards and promotes the welfare of all children, we are committed to achieving the following aims

- provide all staff with the necessary professional development opportunities to enable them to identify children who may benefit from Early Help, to work with children and their families to bring about positive change, and how to take appropriate action to safeguard children when necessary
- ensure all our policies, procedures and practices are designed with regard to this Early Help and Child Protection Policy, ensuring compliance and consistency across the school environment
- seek opportunities to work together with those voluntary and statutory services who share our commitment to providing Early Help for children and families
- ensure that all children are made aware of the risks they may face both inside and outside of school, and what they can do to keep themselves and others safe
- provide parents and carers with access to information that helps them be aware of the risks their children may face both inside and outside of school, and what they can do to help them keep their children safe

The policy sets out how Purley Oaks Primary School will meet its statutory duty under section 175 of the Education Act 2002 to safeguard and promote the welfare of children and help them to achieve good outcomes. Purley Oaks will provide a safe learning environment and ensure staff have the knowledge and skills to take action where children need extra support from Early Help services or require a social work service because they are in need or need to be protected from harm.

PURLEY OAKS PRIMARY SCHOOL

Key Contacts	Name	Role	Contact Details
Designated safeguarding lead & teacher for CLA	Corinne Forde	AHT Inclusion	0208 688 4268 admin@purleyoaks.croydon.sch.uk
Deputy designated safeguarding leads	Richard Griffin Rosamund Ellery Katie Beard	Headteacher Deputy Headteacher Welfare, Admissions and Attendance	0208 688 4268 admin@purleyoaks.croydon.sch.uk 0208 688 4268
Designated governor for Early Help and Child Protection	Mark Crawley	Governor	0208 688 4268 admin@purleyoaks.croydon.sch.uk
Single point of contact (SPOC)	Consultation line	SPOC Early Help	0208 726 6464 childreferrals@croydon.gov.uk 0208 255 2888 (urgent) 0208 726 6400 (out of hours)
Local Authority Designated Officer (LADO)	Steve Hall Service Manager LADO Jane Parr LADO	LADO	steve.hall@croydon.gov.uk 0208 255 2889 07825830328 Jane.parr@croydon.gov.uk 07985590505 lado@croydon.gov.uk

Interim Director of Early Help and Children's Social care	Debbie Jones	Interim Director of Early Help and Children's Social care	debbie.jones@croydon.gov.uk
Croydon Safeguarding Children's Board	Croydon Safeguarding Children's Board	CSCB	www.croydonlcsb.org.uk safeguardingchildrenboard@croydon.gov.uk 02086047275

## Roles and Responsibilities

All members of staff within our school have a role to play in safeguarding and promoting the welfare of children. Specific members of staff have additional roles and responsibilities. This section outlines our school's expectations of staff.

### All members of staff

- have a responsibility to provide a safe environment in which children can learn
- are prepared to identify children who may benefit from Early Help
- who become concerned about a child's welfare follow the processes in this policy
- may be required to support social workers and other agencies following any referral
- must adhere to the Teachers' Standards 2012, which state that teachers, including headteachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties
- are aware of systems within their school or college which support safeguarding and these are explained to them as part of staff induction
- have read and understand the safeguarding policy, the staff behaviour policy (sometimes called a code of conduct) and the role of the designated safeguarding leads
- will be given copies of the above policies as well as part one of ***Keeping Children Safe in Education*** as part of their induction process, as well as ensuring these policies can be accessed easily via the staff intranet
- receive appropriate safeguarding and Child Protection training which is regularly updated
- receive Early Help and Child Protection updates to provide them with relevant skills and knowledge to safeguard children effectively
- are aware of the Early Help process, and understand their role in it
- know what to do if a child tells them he/she is being abused or neglected

- never promise a child that they will not tell anyone about an allegation- as this may ultimately not be in the best interests of the child
- are aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection
- are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned
- will always speak to the designated safeguarding leads if they are unsure about identifying abuse and neglect
- will maintain records about any concerns they have about a child as necessary
- understand how to report concerns about adults working with children including low-level concerns
- Understand the need for them to report to the Headteacher any incidents in their private life that may be considered a transferable risk to children

#### The Designated Safeguarding Lead (DSL)

- is an appropriate senior member of staff from the school's leadership team
- is supported by deputy DSLs
- takes lead responsibility for Early Help, Safeguarding and Child Protection within the school
- liaises with Croydon Council and works with other agencies in line with **Working Together to Safeguard Children & under section 11 of the Children Act 2004**
- (and or the deputies) is always available (during school or college hours) for staff in the school to discuss any safeguarding concerns
- undergoes training to provide them with the knowledge and skills required to carry out the role, updated every two years including Prevent awareness training, and the designated teacher's meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local Early Help, safeguarding and Child Protection procedures and working practices
- keep written records of all concerns when noted and reported by staff or when disclosed by a child, ensuring that such records are stored securely on C-POMs and reported onward in accordance with this policy guidance
- will notify children's social care if a child with a Child Protection plan is absent for more than two days without explanation

- will ensure that when a child with a Child Protection plan leaves the school, their information is passed to their new school and the child's social worker is informed
- will attend and/or contributes to Child Protection conferences in accordance with local procedure and guidance
- will ensure that all staff sign to indicate that they have read and understood this policy
- will ensure that the Child Protection policy is updated annually
- ensure staff, including temporary staff, receive appropriate safeguarding and Child Protection training at least every two years and keep a record of staff attendance at Early Help and Child Protection training
- will make this policy available to parents
- liaise with and manage referrals to relevant agencies such as social services, the LADO, the Channel Panel, the police and the Disclosure and Barring Service (DBS)
- keep the Headteacher and the board of governors informed of on-going safeguarding and Child Protection issues and enquiries
- provides advice and guidance for staff on safeguarding and Child Protection issues and making referrals
- provide regular updates to all staff members and governors on any changes in safeguarding or Child Protection legislation
- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs
- liaise with the designated teacher for LAC whenever there are safeguarding concerns relating to a child looked after or previously looked after

The deputy designated safeguarding leads are appropriately trained and, in the absence of the designated person, carry out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the designated person, the deputy will assume all of the functions above.

#### **The Headteacher**

- allocates sufficient time and resources to enable the DSL and deputies to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings
- ensures that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the school's whistle blowing procedures

- ensures that child's safety and welfare is addressed through the curriculum
- ensures staff are inducted thoroughly and have read all the schools' safeguarding and Child Protection policies, behaviour policies and the CSCB children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies
- enables all staff are able to identify those children who need extra help and can make appropriate referrals to Early Help services
- ensures all staff are vigilant to harm and abuse, are able to identify those children for whom there are Child Protection concerns and can make appropriate referrals to children's social care
- ensures DSLs are able to work in partnership with other agencies to safeguard children, including providing Early Help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- encourages staff to attend learning events and participate in audit activity provided by the Safeguarding Children Board as well as promote published learning from events and serious case reviews
- follows Safer Recruitment practice when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff
- ensures the school offers a safe environment for staff and pupils to learn
- updates the governing board with safeguarding issues
- liaises with the LADO following any report or allegation against a member of staff
- is responsible for keeping records of low-level concerns and creating a culture of openness where staff understand the code of conduct and feel able to report these

### Governing Board

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions. This could be the governors of a maintained school, the trustees of a single or multi- academy trust, or the local governing board to the function in question has been delegated within a multi-academy trust.

The Governing Board (through the Designated Governor for Early Help and Child Protection) ensures that the school has

- a Designated Safeguarding Lead for Early Help and Child Protection who;

- is a member of the senior leadership team given sufficient time and resources to carry out their responsibilities
- who has undertaken the approved Croydon Safeguarding Children Boarding training for Designated Safeguarding Leads
- that another member of staff is appointed to deputise in their absence
- Early Help and Child Protection policies and procedures that are consistent with CSCB requirements, reviewed annually and made available to parents on request
- procedures for dealing with allegations of abuse made against members of staff including allegations made against the headteacher
- arrangements to ensure that all temporary staff and volunteers are made aware of the school's arrangements for Early Help and Child Protection
- a Chair of the Governing Board who is aware that they are responsible for liaising with the LADO in the event of an allegation against the Headteacher
- completed the Annual Section 11 Audit of School Safeguarding Practice provided by the CSCB Education Sub-Group (this audit will be discussed and confirmed by the governing board before submission to the CSCB. Any weaknesses or areas of concern will be rectified without delay
- a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
- a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present
- the ability to work jointly with other agencies in order to ensure pupils can access help and support from Early Help services and statutory social work services and that children's plans are implemented and monitored
- a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role
- an induction process for new staff on joining and they are given copies of all relevant safeguarding and Child Protection policies and the staff code of conduct policy
- staff who are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the school and there are robust whistleblowing procedures in place
- taken steps to ensure parents and pupils are aware of the school's safeguarding and Child Protection policies and procedures

- governors who ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including online
- appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis
- at least one member of the Governing Board has undertaken accredited safer recruitment training
- safeguarding and Child Protection training at least every two years for all staff who receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation (best practice is that training is carried out every year)
- procedures in place to deal with allegations made against other pupils
- consideration for children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils

### **Croydon's Children Families & Education Directorate**

The Directorate includes services that will support the school to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an Early Help service
- providing statutory social work services under the Children Act 1989
- providing the school with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for Child Protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated

### **Working with parents and carers**

The school recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The school will:

- make parents aware of the school's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by making all school policies available on the school web-site or on request
- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff
- consult with and involve parents and carers in the development of school policies to ensure their views are taken into account
- ensure a robust complaints system is in place to deal with issues raised by parents and carers
- provide advice and signpost parents and carers to other services and resources where pupils need extra support

### **Multi-agency working**

The school will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and Working together to safeguard children 2018.

The school recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

### **Types of Abuse and Neglect and Specific Safeguarding Concerns**

All members of staff must be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another. Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They must be viewed as part of a jigsaw, and each small piece of information will help the DSLs to decide how to proceed. It is very important that members of staff report concerns – they do not need 'absolute proof' that the child is at risk.

A child is any person who has not yet had their eighteenth birthday. Social work teams will also act to protect unborn children and offer ongoing support, up to 25 years, to some children who have been in care.

**ALL** children and young persons are vulnerable to abuse. Extra vigilance is required to support children from vulnerable groups such as Children Looked After and children with Special Educational Needs and Disabilities.

Children Looked After are potentially vulnerable and staff need to work with the agencies involved to keep them safe. Section 4 to 6 of the Children and Social Act 2017 states that designated teachers will have a responsibility alongside the Virtual School Head for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders.

Children with SEND are more prone to peer group isolation and need extra pastoral support. Behaviour policies must be proactive in minimising the need for reasonable force to safeguard vulnerable pupils including those with SEND.

### **Abuse**

A form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

### **Physical Abuse**

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

Most children will collect cuts and bruises as part of the rough-and-tumble of daily life. Injuries must always be interpreted in light of the child's medical and social history, developmental stage and the explanation given. Most accidental bruises are seen over bony parts of the body, e.g. elbows, knees, shins, and are often on the front of the body. Some children, however, will have bruising that is more than likely inflicted rather than accidental. Important indicators of physical abuse are bruises or injuries that are either unexplained or inconsistent with the explanation given, or visible on the 'soft' parts of the body where accidental injuries are unlikely, e.g. cheeks, abdomen, back and buttocks. A delay in seeking medical treatment when it is obviously necessary is also a cause for concern, although this can be more complicated with burns, as these are often delayed in presentation due to blistering taking place sometime later.

**Bruises**

**Burns or scalds**

**Bite Marks**

<ul style="list-style-type: none"> <li>● commonly on the head but also on the ear or neck or soft areas - the abdomen, back and buttocks</li> <li>● defensive wounds commonly on the forearm, upper arm, back of the leg, hands or feet</li> <li>● clusters of bruises on the upper arm, outside of the thigh or on the body</li> <li>● bruises with dots of blood under the skin</li> <li>● a bruised scalp and swollen eyes from hair being pulled violently</li> <li>● bruises in the shape of a hand or object.</li> </ul>	<ul style="list-style-type: none"> <li>● can be from hot liquids, hot objects, flames, chemicals or electricity</li> <li>● on the hands, back, shoulders or buttocks; scalds may be on lower limbs, both arms and/or both legs</li> <li>● a clear edge to the burn or scald</li> <li>● sometimes in the shape or an implement for example, a circular cigarette burn</li> <li>● multiple burns or scalds.</li> </ul>	<ul style="list-style-type: none"> <li>● usually oval or circular in shape</li> <li>● visible wounds, indentations or bruising from individual teeth.</li> </ul>
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Fractures or Broken Bones	Other Injuries & Health Problems	
<ul style="list-style-type: none"> <li>● fractures to the ribs or the leg bones in babies</li> <li>● multiple fractures or breaks at different stages of healing</li> </ul>	<ul style="list-style-type: none"> <li>● scarring</li> <li>● effects of poisoning such as vomiting, drowsiness or seizures</li> <li>● respiratory problems from drowning, suffocation or poisoning</li> </ul>	

### Emotional Abuse

The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may

include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another.

It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. This type of abuse can impact upon a child's mental health and emotional wellbeing.

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. There often are not any obvious physical symptoms of emotional abuse or neglect but you may spot signs in a child's actions or emotions. Changes in emotions are a normal part of growing up, so it can be difficult to tell if a child is being emotionally abused.

Young children who are being emotionally abused or neglected may

- be overly-affectionate towards strangers or people they have not known for very long
- lack confidence or become wary or anxious
- not appear to have a close relationship with their parent, e.g. when being taken to or collected from nursery etc.
- be aggressive or nasty towards other children and animals

Older children may

- use language, act in a way or know about things that you would not expect them to know for their age
- struggle to control strong emotions or have extreme outbursts
- seem isolated from their parents
- lack social skills or have few, if any, friends

### **Sexual Abuse**

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

They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Child on child sexual abuse is a specific form of abuse. Primarily it is important to remember that peer-on-peer Child Sexual Exploitation is just one form of abuse and violence that young people experience from their peers. It is likely to include but not limited to, bullying (including cyberbullying), sexual violence, sexual harassment and sexting.

Therefore, if we want to develop the most effective response, it is necessary to consider the wider context in which peer-on-peer CSE takes place, which includes

- Understanding how peer-on-peer CSE relates to other forms of violence and abuse that young people experience, including gang and serious youth violence, teenage relationship abuse (if under 16), domestic abuse (if over 16), sexual bullying and harmful sexual behaviour (Firmin and Curtis 2015)
- Identifying and the mapping trends to identify the environments/contexts in which peer-on-peer CSE and other forms of harm and abuse occur, including peer-groups, schools and neighbourhoods (Firmin and Curtis 2015) (Firmin 2015)

<http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB04.pdf>

Children who are sexually abused may:

Stay away from certain people	Show sexual behaviour that is inappropriate for their age	Have physical symptoms
<ul style="list-style-type: none"> <li>• they might avoid being alone with people, such as family members or friends</li> <li>• they could seem frightened of a person or reluctant to socialise with them</li> </ul>	<ul style="list-style-type: none"> <li>• a child might become sexually active at a young age</li> <li>• they might be promiscuous</li> <li>• they could use sexual language or know information that you would not expect them to</li> </ul>	<ul style="list-style-type: none"> <li>• anal or vaginal soreness</li> <li>• an unusual discharge</li> <li>• sexually transmitted infection (STI)</li> </ul>

**Neglect**

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

Neglect can be difficult to identify, making it hard for professionals to take early action to protect a child. Having one of the signs or symptoms below does not necessarily mean that a child is being neglected. But if you notice multiple, or persistent, signs then it could indicate there is a serious problem.

Children who are neglected may have:

Poor Appearance and Hygiene Issues	Housing and Family Issues	Health and Development Problems
<ul style="list-style-type: none"> <li>● be smelly or dirty</li> <li>● have unwashed body or clothes</li> <li>● inadequate clothing for weather</li> <li>● often hungry or not having had breakfast</li> <li>● frequent nappy rash</li> </ul>	<ul style="list-style-type: none"> <li>● living in an unsuitable home environment for example dog mess being left or not having any heating</li> <li>● left alone for a long time</li> <li>● taking on the role of carer for other family members.</li> </ul>	<ul style="list-style-type: none"> <li>● untreated injuries, medical and dental issues</li> <li>● repeated accidental injuries caused by lack of supervision</li> <li>● recurring illnesses or infections</li> <li>● not been given appropriate medicines</li> <li>● missed medical appointments such as vaccinations</li> <li>● poor muscle tone or prominent joints</li> <li>● skin sores, rashes, flea bites, scabies or ringworm</li> <li>● thin or swollen tummy</li> <li>● anaemia</li> </ul>

### **Bullying (Including Online Bullying)**

While bullying between children is not a separate category of abuse and neglect, it is a very serious issue that can cause considerable anxiety and distress. At its most serious level, bullying is thought to result in up to 12 child suicides each year. All incidences of bullying must be reported and will be managed through our behaviour and anti-bullying procedures. All pupils and parents receive a copy of the anti-bullying procedures on joining the school and the subject of bullying is addressed at regular intervals in the personal, social and health education (PSHE) curriculum. If the bullying is particularly serious, or the anti-bullying procedures are deemed to be ineffective, the Headteacher and the DSL will consider implementing Child Protection procedures.

A child may be experiencing abuse online if they

- spend lots, much more or much less time online, texting, gaming or using social media
- are withdrawn, upset or outraged after using the internet or texting
- are secretive about who they are talking to and what they are doing online or on their mobile phone
- have lots of new phone numbers, texts or e-mail addresses on their mobile phone, laptop or tablet

### **Specific Safeguarding Issues**

Children are also impacted by specific safeguarding issues, which are events which encompass all of the above types of abuse. These issues are further compounded by children exhibiting behaviours such as drug taking, alcohol abuse, absence from school, and sexting. Child on child abuse is also an indicator that children may be exposed to bullying (including online bullying), gender based violence/sexual abuse and sexting. Members of staff will challenge child on child abuse in conjunction with the DSL, Local Authority, Police and parents and carers.

### **Children Missing from Education**

A Child Missing from Education (CME) is defined by the Department for Education (DfE) as ‘a child of compulsory school age who is not on a school roll, nor being educated otherwise (e.g. privately or in alternative provision) and who has been out of any educational provision for a substantial period of time (usually four weeks or more)’.

A child going missing from education is a potential indicator of abuse or neglect. Members of staff will follow the school’s attendance policy, Early Help and safeguarding policy and Croydon’s Children Missing from Education policy, particularly when children are absent without reason on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. It is also essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation

and forced marriage. Croydon's Children Missing from Education policy provides information on what to consider when a school is informed that a family is going abroad.

For schools in Croydon, referrals for CME are accepted after 10 working days of reasonable checks being carried out by the school and the Designated Safeguarding Lead. All schools are legally required to provide this information, as well as the details of any child joining or leaving the school during the year.

Where reasonable schools will hold more than one emergency contact for all pupils to go beyond the legal minimum and to provide additional safeguarding for vulnerable children.

### Children Missing from Education and Pupil Off Rolling

Children who run away or go missing from home or care

<https://www.croydon.gov.uk/education/schools-new/attendance/child-missing-education>

### Child Sexual Exploitation and Child Criminal Exploitation

CSE and CCE are both forms of abuse where children are exploited for sexual or criminal activity. It can involve violent, humiliating and degrading sexual assaults. In some cases, young people are persuaded or forced into exchanging sexual activity, or engaging in criminal behaviour for money, drugs, gifts, affection or status. Consent cannot be given, even where a child may believe they are voluntarily engaging in sexual or criminal activity with the person who is exploiting them. It can be a one-off occurrence or linked to organised crime. Child Sexual Exploitation does not always involve physical contact and can happen online. A significant number of children who are victims of sexual exploitation go missing from home, care and education at some point. Some of the following signs may be indicators of sexual exploitation. Children who

- appear with unexplained gifts or new possessions
- associate with other young people involved in exploitation
- have older boyfriends or girlfriends
- suffer from sexually transmitted infections or become pregnant
- suffer from changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late
- regularly miss school or education or do not take part in education

Referrals in relation to concerns of CSE and CCE can be discussed via the SPOC Consultation Line, but must be made via the online SPOC Referral Form as per any normal safeguarding referral.

## Child sexual exploitation – DfE guidance

### Female Genital Mutilation (FGM) and so-called ‘Honour Based’ Abuse (HBA)

So-called ‘honour-based’ abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. It includes non-violent forms of abuse. All forms of so-called HBA are abuse (regardless of the motivation) and must be handled and escalated as such. If in any doubts staff will speak to the Designated Safeguarding Leads.

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

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they must not be examining pupils, but the same definition of what is meant by ‘to discover that an act of FGM appears to have been carried out’ is used for all professionals to whom this mandatory reporting duty applies.

The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow local safeguarding procedures.

A girl or woman who has had FGM may

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear

Referrals in relation to concerns of HBV and CSE can be discussed via the SPOC Consultation Line, but must be made via the online SPOC Referral Form as per any normal safeguarding referral.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/496415/6\\_1639\\_HO\\_SP\\_FGM\\_mandatory\\_reporting\\_Fact\\_sheet\\_Web.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf)

### **Forced Marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Our school can play an important role in safeguarding children from forced marriage.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/322307/HMG\\_MULTI\\_AGENCY\\_PRACTICE\\_GUIDELINES\\_v1\\_180614\\_FINAL.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/322307/HMG_MULTI_AGENCY_PRACTICE_GUIDELINES_v1_180614_FINAL.pdf)

Forced marriage - FCO Guidance

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation is part of schools and colleges' wider safeguarding duties, and is similar in nature to protecting children from other forms of harm and abuse. During the process of radicalisation, it is possible to intervene to prevent vulnerable people being radicalised.

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people. As with other safeguarding risks, staff must be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Some examples of signs that a child may be at risk of radicalisation are

- being overly secretive about their online viewing – for example this is one of the core ways in which ISIS is known to communicate and recruit
- displaying feelings of isolation or expressions of an 'us and them' mentality – a sign of the sense of social isolation
- becoming more argumentative or domineering in their viewpoints, being quick to condemn those who disagree and ignoring views that contradict their own.
- questioning their faith or identity
- downloading or promotion extremist content

- losing interest in activities they used to enjoy, distancing themselves from friends and social groups
- altered appearance – change in style of dress and/or personal appearance
- abnormal routines, travel patterns or aspirations

All schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have ‘due regard to the need to **prevent** people from being drawn into terrorism’. The statutory Revised Prevent duty guidance: for England and Wales (for schools) summarises the requirements on schools in terms of four general themes. We will meet our requirements by

- assessing the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology
- ensuring our Early Help and safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board
- promoting active engagement with parent and carers as they are in a key position to spot signs of radicalization
- assisting and advise families who raise concerns and point them to the right support mechanisms
- discussing any concerns about possible radicalisation with a child’s parents in line with this policy unless we have specific reason to believe that to do so would put the child at risk
- ensuring that as many members of staff as possible undertake preventing radicalisation training, with priority given to the Designated Safeguarding Lead
- ensuring children are safe from terrorist and extremist material when access the internet in school

Channel is a programme, which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if they are concerned that an individual might be vulnerable to radicalisation. An individual’s engagement with the programme is entirely voluntary at all stages. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required.

The SPOC Consultation Line can be contacted for advice on making a referral to Channel, but any safeguarding referral must be made via the online SPOC Referral Form.

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/439598/prevent-duty-departmental-advice-v6.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf)

<http://educateagainsthate.com/>

<https://www.elearning.prevent.homeoffice.gov.uk/>

[http://course.ncalt.com/Channel\\_General\\_Awareness/01/index.html](http://course.ncalt.com/Channel_General_Awareness/01/index.html)

Promoting fundamental British values as part of SMSC in schools

**Croydon's Prevent coordinator:** [haydar.muntadhar@croydon.gov.uk](mailto:haydar.muntadhar@croydon.gov.uk) tel. 0208 726 6000 (ext. 62070)

### **Domestic Abuse and Sexual Violence, including Child on child Abuse**

The Government's definition, amended in April 2013 to include 16 and 17 year olds, and coercive control is:

'Any incident or pattern of incidents of controlling, coercive or threatening behaviour, violence or abuse between those aged 16 or over who are or have been intimate partners or family members regardless of gender or sexuality. This can encompass, but is not limited to, the following types of abuse; Psychological, Physical, Sexual, Financial, Emotional.'

DASV can have a huge impact on affected children and young people. It can affect their safety, health and wellbeing, educational attainment, family and peer relationships, and their ability to enjoy healthy, happy, respectful relationships in the future. It is likely that there will be young people and staff within our school who are experiencing or perpetrating domestic abuse or sexual violence. Our school is responsible for making sure its learners and staff are safe and healthy.

It is important to consider domestic and sexual abuse as a possible explanation for any unusual behaviour.

The following signs and symptoms can be warning signs that a child or young person is experiencing domestic and sexual abuse

● persistent absence from school	● eating disorders	● early/unwanted pregnancy	● anxiety
● decline in behaviour,	● depression	● evidence of control over movement	● substance misuse

performance and engagement

- self-harm
- isolation
- evidence of being monitored by family or other adults
- attempted suicide

The Designated Safeguarding Lead will act as the first point of contact for any concerns about Domestic Abuse and Sexual Violence, including Child on child abuse. Our Designated Safeguarding Lead can seek advice from the SPOC Consultation Line, or the Family Justice Centre on 0208 688 0100 or [fjc@croydon.gov.uk](mailto:fjc@croydon.gov.uk).

Any concerns that a child may be at risk of significant harm must be reported immediately via SPOC on 0208 726 6000 and via the SPOC online referral form.

Adolescent to parent violence and abuse (APVA)

### Child on child abuse

<https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges>

[Review of sexual abuse in schools and colleges - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/publications/sexual-abuse-in-schools-and-colleges)

Following the Ofsted review and the updated KCSIE 2021, schools have a statutory duty to respond to and record all incidents of sexual harassment, sexual violence and behaviour occurring physically, verbally or online, including malicious and unproven allegations, whether at school or taking place elsewhere. Schools must take all reports seriously and have clear records detailing the investigation and outcomes of the allegation. Where necessary, it may involve a SPOC or police referral depending on the severity of the allegation. If both children (perpetrator and victim) attend the same school, steps will need to be taken to support them appropriately and sensitively, with involvement of parents. Children who commit acts of sexual abuse against others are likely to be victims themselves.

Schools must be aware of the risks and identifying factors for child on child abuse, with an assumption that 'it could happen here' regardless of the age and stage of development of children. Sexual violence can occur between children of any age. Behaviour that may seem innocuous could be useful in providing early intervention to children who may be at risk of developing harmful sexual behaviours. Despite research showing that girls are more likely to be

victims of this type of abuse, it can occur between both sexes and sexual violence and harassment are part of an overlapping continuum of concerns.

Schools must tackle and challenge outdated views such as 'it's only banter,' or 'just boys being boys' with regards to any report of sexual behaviour or harassment. DSLs must also be aware of the language and slang that children use to explain these incidents, as professional terms such as 'sexting' are not used by children which could lead to reports being misunderstood if staff are not up-to-date with how children view these incidents.

### **Harmful sexual behaviour, sexual violence and harassment**

The school recognises that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. School behaviour management and anti-bullying policies will reflect the school's approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

The school will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils.

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

The school will take all necessary steps to put in place a planned RHSE curriculum to convey the school's policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils concerning sexual conduct. It will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school and appropriate referrals made to the police and children's social care. The school will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff. It will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

## Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their Child Protection policy and speaking to the designated safeguarding lead or a deputy. An Emotional Health and Wellbeing referral may be made via the SPOC for professional support.

## Procedures

The school will ensure there is a robust response to all incidents and will follow the procedures set out in *Keeping children safe in education* statutory guidance. Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the school environment

Where the allegation involves material posted online, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance *Searching, screening and confiscation advice for schools*. The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the school will respond to the incident.

The designated safeguarding lead may take advice from SPOC Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under school behaviour policies. Where a referral will be made to children social care or the police, the designated

safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents. The school will take any necessary action to continue to safeguard the victim and other pupils within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children's social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator. Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf

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

### **Child Trafficking & Modern Slavery**

Child trafficking is the recruitment and movement of children for the purpose of exploitation; it is a form of child abuse. Children may be trafficked within the country, or from abroad. It overlaps with CSE and Private Fostering. Children may be trafficked for

- sexual exploitation
- labour exploitation
- domestic servitude
- cannabis cultivation
- criminal activity
- benefit fraud
- forced marriage
- drug trafficking

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

### **Private Fostering**

Private Fostering is an arrangement between two parties without the involvement of the Local Authority for a child under the age of 16 (18 if disabled). This arrangement would be with someone who is not a parent or close relative, and lasts 28 days or more. Private fostering is

used as a form of childcare by parents who are not able to take care of their child on a day-to-day basis, for whatever reason. However, unreported arrangements can be used to exploit children.

The law requires that the Local Authority must be informed at least 6 weeks in advance of an arrangement or 48 hours after in the case of an emergency. Social workers will

- check the suitability of the Private Foster carers through checks and assessments
- make regular visits to the child and monitor the standard of care
- ensure they have all the necessary information and advice they require

### **Ritualistic abuse**

In some faiths there is a belief that spirits and demons can possess people. Physical violence must never be condoned as a reason to get rid of a spirit or a demon.

### **Non-collection of children from school**

The school has systems in place regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected are recorded.

Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual. If there is a court or supervision order in place, the school will endeavour to adhere to the content and will liaise with families over how best to provide support. We will not be able to facilitate access during lesson time.

In the event that anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave but contact the parent immediately.

If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

The schools will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them. Children will not be released into the care of another parent even where they offer to take the child home.

The school will contact the SPOC Professionals' Consultation Line to seek advice at 4.00pm if there are difficulties in contacting parents or other family members. If all possible means of

contact have been exhausted and no contact can be made with the parent by 4.30pm, the school will contact SPOC and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social office.

The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so. It is the parents' responsibility to update the school with contact names and numbers. Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead. If there are also Child Protection concerns, a referral should be made to children's social care via SPOC.

### **Young people at risk from gang activity or serious youth violence**

Schools are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

Schools need to be alert to the possibility of children and young people bringing weapons onto their school site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Under Croydon's weapons in schools protocol the police must be informed via 101 of any pupil found in possession or a weapon in school or any weapon that is found on the school site.

### **Preventing youth violence and gang involvement**

#### **Early Help Procedures**

Keeping Children Safe in Education and Working Together to Safeguard Children (2018) set out a clear expectation that local agencies and schools will work together and collaborate to identify those children with additional needs and provide support as soon as a problem emerges. Providing Early Help is far more effective in promoting the welfare of children – and keeping them safe – than reacting later, when any problems, for example neglect, may have become more entrenched. The importance of using a child-centred approach in following the child's journey is also emphasised. To achieve this, members of staff involved in the Early Help process must have a clear understanding of the needs and the views of the individual child in their family and community context.

Our school is committed to ensuring everything possible is done to prevent the unnecessary escalation of issues or problems. Children, young people and their families will be offered help when needs and/or concerns are first identified and, as a consequence of the Early Help offered,

children's circumstances will improve and, in some cases, the need for more intrusive and intensive services are lessened or avoided.

The guiding principles of Early Help are

- high quality early identification and intervention for all children who need it, as well as effective integrated support for children with the most complex needs
- work with families to enable them to build resilience and improve their capacity to help themselves should problems arise in the future
- early intervention may occur at any point in a child's life
- children, young people and their families are listened to, practice is focused on their needs which is captured in the Early Help Assessment
- the journey of the child is captured through their wishes and feelings
- to achieve better outcomes for children, young people and families, we see early intervention and prevention as a shared responsibility, where agencies work together, jointly 'holding the baton' for children and families
- safeguarding is everyone's responsibility and the welfare of the child/young person is paramount

Staged intervention is an inclusive approach, involving parents and carers, children and young people, our school, relevant professionals and support services, which allows our school and practitioners to make informed and proportionate responses to need. In the Croydon model, there are four stages: Universal, Vulnerable, Complex and Acute.

Each stage provides a solution focussed approach to meeting needs at the earliest opportunity, with the most appropriate and least intrusive level of intervention. It is an incremental evidence based approach - all relevant approaches at the lower stages have been tried before involving services that provide a more intensive approach. This may also be known as a 'graduated response' to Early Help.

Our school will most likely provide support to children and their families at Stage One (Universal) and Stage Two (Vulnerable) of the staged intervention approach. This means that we will work with children and families at the earliest possible point to help them by listening to their needs and developing a support plan which takes into account any access that may be required to additional resources, expertise or to consider any adjustments that can be made in school. We will also support children and families who may need further support through the use of the 'Early Help Assessment' and the organization of a 'Team Around the Family', a team which consists of members of staff from the school, parent and carer(s), the child or children (if it is

appropriate) and other professionals from services who may be able to support the family. The diagram below helps explain this process a bit further.

Members of staff can seek help from our Locality Early Help Advisor (details on contacts page). They can provide information, advice and guidance on all aspects of Early Help from the first point at which additional need is identified to 'stepping up' into support for complex needs.

This support can be accessed by members of staff at any point of the Early Help process and could include

- advice, face to face, on the telephone or by email
- guidance about the Early Help pathway/staged intervention
- support to identify universal and community services
- attend Team Around the Family meetings to provide support and challenge where necessary
- case consultation sessions
- information and identification about Early Help learning and development for individuals or staff teams

Our school will always seek to discuss our concerns with the child's family (and if appropriate, directly with the young person) to let them know what is going on and how we are trying to help. We will need consent to share information to access support. We recognise that families may also be able to explain, assist or resolve the issues themselves.

### **Stage One - Universal services for all children, young people and their families**

All children need support in order to learn and develop. In the majority of cases, our school will be able to meet the needs of a child or young person by personalising our approach, but some children require support which is additional to, or different from, what we normally provide.

Our offer of Early Help begins at Stage One with the personalisation of support to meet the needs of children and their families. Our School has access to a variety of different sources of information, support and advice that we can use to meet the needs of each child.

A child's needs may be short term, and we may be able to address the problem relatively easily. For some children, their needs might be more complex and they may require access to additional support for a longer period of time, which we will do by 'stepping up' to Stage Two.

### **Stage Two - Targeted Early Help for vulnerable children and families**

If we have tried to meet the child or young person's needs from within the full range of support we can offer without progress/success we will now need to engage additional support from other services. In doing so we will need to decide whether the help the child and/or family needs can be met by involving one other service or if multiple services may be required. If we have not already done so, we will discuss our concerns with the family (and child as appropriate). We will need the family's consent to share information with another agency to access additional support. If we are able to decide that the child's need(s) can be met from one other service and we have consent, we can refer to them directly. If we decide the child's need(s) require support from more than one service and we have consent we will need to undertake an Early Help Assessment with the family, or check if an Early Help Assessment (CAF) has already been initiated by emailing [earlyhelp@croydon.gov.uk](mailto:earlyhelp@croydon.gov.uk) .

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require Early Help:

- children with disabilities and additional needs, including those with special educational needs
- young carers
- children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime
- children who frequently go missing from home, school or care
- children who are misusing drugs or alcohol
- children at risk of exploitation through modern slavery and trafficking
- children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse
- children who have returned home from care
- children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low level neglect
- children at risk of radicalisation
- privately fostered children

### **Early Help Assessment**

The Early Help Assessment is the assessment tool used to assess needs that are not being met through our existing personalised support and where a child and family would benefit from coordinated support from other services apart from our school.

Once we have assessed the needs and strengths of the child with the family, the Early Help Assessment can be shared with the services that we think need to be involved to meet the needs of the child and their family. By doing this the family do not have to repeat their story more than once and the services we have identified have a clear understanding of how their services can be of help.

**Team Around the Family**

The Team Around the Family are the professionals from services we have invited to work together with the family to provide support. We aim to arrange a TAF meeting within 6 weeks of completing the Early Help assessment to establish a support plan and agree who is the best person to be the lead professional.

If a member of staff is not sure which service(s) to invite to the TAF meeting they can visit [www.practitionerspacecroydon.co.uk](http://www.practitionerspacecroydon.co.uk) for information about local services or contact our Early Help Advisor for advice at [earlyhelp@croydon.gov.uk](mailto:earlyhelp@croydon.gov.uk).

**Lead Professional**

A lead professional can be any adult who works with and supports a child, young person or their family. A lead professional can be from any agency or setting. The most important selection criteria is that they are best placed to coordinate provision to meet the child and family’s needs, and have a good relationship with them. This means that a member of staff will quite often be best placed to be the Lead Professional.

Skills and qualities that practitioners in Croydon feel are important to the role of Lead Professional	
<ul style="list-style-type: none"> <li>● strong communication and organisational skills</li> <li>● availability</li> <li>● access to resources (such as IT) and information</li> <li>● impartiality</li> </ul>	<ul style="list-style-type: none"> <li>● ability to bring out the voice of the child</li> <li>● committed to best outcomes</li> <li>● confidence to challenge where necessary</li> <li>● understanding of the Early Help Assessment and review process</li> </ul>
The lead professional’s role is to;	
<ul style="list-style-type: none"> <li>● develop a successful and productive relationship with the child, young person and their family</li> </ul>	<ul style="list-style-type: none"> <li>● co-ordinate the delivery of effective early intervention work and on-going support</li> </ul>

- |   |  |
|---|--|
| <ul style="list-style-type: none"><li>● act as a single point of contact for the child, young person and their family</li><li>● with consent, organise multi-disciplinary and multiagency meetings and discussions</li><li>● use the Early Help Assessment to develop support plans based on the outcomes</li></ul> | <ul style="list-style-type: none"><li>● work in partnership with other professionals to deliver the support plan</li><li>● review and monitor the support plan and progress made regularly</li></ul> |
|---|--|

When a member of staff is the lead professional, they are accountable to our school for their delivery of lead professional functions; they are not responsible for the actions of other professionals. When a member of staff is the lead professional, they will regularly review the support plan consider if changes need to be made or additional services required in partnership with the Team Around the Family.

Where there is evidence that the support being provided is not achieving the desired outcomes within a reasonable timescale (using an appropriate tool to measure impact and progress) they will need to decide whether it is appropriate to do all or any of the following

- amend the support plan
- engage additional/different services
- change the lead professional
- step up to Stage 3 for targeted support
- seek support from Locality Early Help

If a member of staff is not the lead professional but have concerns that need are not being met and risks to the child are increasing, they will share their concerns with the lead professional, who will consider the situation and decide whether to convene an earlier TAF review meeting or escalate to the SPOC as a safeguarding/Child Protection concern.

### **Child Protection Procedures**

The school will seek advice from the SPOC Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

**The SPOC Professionals' Consultation Number is 0208 726 6464**

All referrals for a children's social care service will be made by way of Single Point of Contact (SPOC) Safeguarding Referral Form. SPOC is Croydon's "front door" for children's social care referrals and accepts referrals for all cases.

SPOC Referral Form <https://ehmportal.croydon.gov.uk/web/portal/pages/help/apply/cpassess#h1>

### **Taking Action**

If staff members have any concerns about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there will be a conversation with the designated safeguarding lead to agree a course of action, although any staff member can make a referral to SPOC. Other options could include referral to specialist services or Early Help services and will be made in accordance with the referral threshold set by Croydon Safeguarding Children Board.

If anyone other than the designated safeguarding lead makes the SPOC referral they must inform the designated safeguarding lead, as soon as possible. The SPOC will make a decision within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral should that information not be forthcoming.

Staff members will encourage children to speak to them about any changes in behaviour or about any other inconclusive signs that may indicate abuse or harm. The signs the staff member has noticed may be due to a variety of factors and it is fine to ask the child if they are alright or if they can help in any way.

### **If a child discloses information to a member of staff**

It takes a lot of courage for a child to disclose that they are being neglected and or abused. They may feel ashamed, particularly if the abuse is sexual, their abuser may have made threats to kill or injure should they tell, they may have lost all trust in adults, or they may believe, or have been told, that the abuse is their own fault. If a child talks to a member of staff about any risks to their safety or wellbeing they will need to let them know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgement. If you jump in immediately the child may think that you do not want to listen, if you leave it till the very end of the conversation, the child may feel that you have misled them into revealing more than they would have otherwise.

**During the conversation with the child;**

- Allow them to speak freely
- Do not automatically offer any physical touch as comfort. It may be anything but comforting to a child who has been abused
- Remain calm and do not over react – the child may stop talking if they feel they are upsetting you
- Avoid admonishing the child for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the child may interpret it that they have done something wrong
- Give reassuring nods or words of comfort – ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’
- Tell the child what will happen next. The child may agree to go with you to see the designated safeguarding lead. Otherwise let them know that someone will come to see them before the end of the day
- Do not be afraid of silences – remember how hard this must be for the child
- Report verbally to the designated person

**Notifying Parents and Gaining Consent**

The school will normally seek to discuss any concerns about a child with their parent and carers. This must be handled sensitively and the DSL will make contact with the parent in the event of a concern, suspicion or disclosure and to seek consent to share this information with the Multi-Agency Safeguarding Hub. However, if the school believes that notifying parents could increase the risk to the child or exacerbate the problem, then advice will first be sought from SPOC.

**Referral to Croydon Multi-Agency Safeguarding Hub (SPOC)**

The DSL (or another member of staff) will make a referral to SPOC if it is believed that a child is suffering or is at risk of suffering significant harm. The child (subject to their age and understanding) and the parents will be told that a referral is being made, unless to do so would increase the risk to the child. SPOC will decide whether this will be a Section 17 Child in Need or a Section 47 Child Protection Assessment if it meets the threshold.

If a child is in immediate danger or is at risk of harm a referral must be made verbally immediately to SPOC via 0208 726 6000 and/or the police via 999. Any verbal SPOC referrals or

referrals that do not require an immediate response will be made via the Online SPOC Referral form.

### Record Keeping

Record keeping is an essential part of Child Protection in our school; it is vital that it is done accurately as soon after the event as possible and managed carefully and securely.

- Evidence has played an important part in inspections and legislation requires the maintenance of certain statutory records - we have to evidence what we say. Increasingly when managing Early Help and Child Protection concerns, accurate and timed records are invaluable
- We will forget details – every aspect of the incident or concern might be crystal clear at the time but we cannot guarantee this will be the same in a few days

All records will be objective and accurate, be clear about names, dates, places etc. and also distinguish between fact and opinion, hearsay and direct information. Child Protection files will be in either a separate locked cabinet or on a separate Network Drive with access restricted to the Designated Safeguarding Lead (and their deputy), headteacher and Nominated Governor. We also have a clear policy on the removal of files and by whom which includes

- the Designated Safeguarding Lead must be informed if files are taken to a meeting and the file must be returned to them
- confidentiality – while staff may need the general contextual information to support a child's welfare, private and individual circumstances will only be discussed with the Designated Safeguarding Lead, who will inform others on a 'need to know' basis

All Child Protection concerns must be included in the Child Protection file (including those where a decision has been made not to make a formal referral to SPOC. All other information gathered that falls below the Child Protection threshold will be held in the child's pupil file. Examples of information gathered which does not meet the threshold of Child Protection are:

- information gathered as part of an Early Help Assessment
- discussions with parents and carers
- lack of engagement with parents
- concerns regarding hygiene, clothing
- poor punctuality
- absence from school/fixed term exclusions
- under stimulation/poor concentration/underachieving

- frequent absence/health concerns/missed appointments
- concerns about diet
- poor peer relationships
- low self-esteem leading
- bullying

Remember that informal notes can be requested as evidence and whatever you write must be done objectively and with professionalism.

### **Transfer of information**

When a child moves to another school or educational establishment, all Child Protection records will be retained by our school, but copies of the records will be hand-delivered or emailed securely via Egress or other password protected means (if not possible, sent securely) to the receiving Designated Safeguarding Lead (DSL), separate from their general records and marked as strictly confidential; this must be done within 15 working days and we will always obtain written confirmation of receipt of these records. Once we have received written confirmation that the Child Protection records have been received by the new school, the Child Protection records we hold will be stored electronically.

Child Protection records do not form part of the pupil's educational record and are not required to be disclosed to parents and carers.

Any requests from a parent and carers solicitor to have Child Protection records disclosed to them will be passed to either our legal advisor or we will consult with the Legal Services team at Croydon Council.

### **Attendance at case conferences and core groups**

The designated safeguarding lead will liaise with children's social care to ensure that all relevant information held by the school is provided to children's social care during the course of any Child Protection investigation.

The designated safeguarding lead will ensure that the school is represented at Child Protection case conferences and core group meetings

- where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend
- failing that, the designated safeguarding lead or their deputy will attend

- if no-one from the school can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting

### **Monitoring**

Where a pupil is the subject of a Child Protection plan and the school has been asked to monitor their attendance and welfare as part of this plan;

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead
- all information will be recorded on the request for information form prior to each conference and core group meeting
- the completed form will be kept on the pupil's separate Child Protection file (that should be separate from the school record) and copies made available to all conferences and core group meetings
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing

### **Confidentiality and sharing information**

All members of staff understand that Child Protection issues warrant a high level of confidentiality, not only out of respect for the child and staff involved but also to ensure that being released into the public domain does not compromise evidence.

Staff must only discuss concerns with the designated person, Headteacher or chair of governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis.

Child protection information will be stored and handled in line with Data Protection Act 1998 principles. Information is

- processed for limited purposes
- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

Every effort will be made to prevent unauthorised access and sensitive information must not be stored on laptop computers, which, by the nature of their portability, could be lost or stolen. If it is necessary to store Child Protection information on portable media, such as a CD or flash drive, these items will also be kept in locked storage. Child protection information will be stored separately from the child's school file and the school file will be 'tagged' to indicate that separate information is held.

Child protection records are normally exempt from the disclosure provisions of GDPR (General Data Protection Regulation) and the Data Protection Act, which means that children and parents do not have an automatic right to see them. If any member of staff receives a request from a child or parent to see Child Protection records, they must refer the request to the headteacher.

The Data Protection Act and GDPR does not prevent school staff from sharing information with relevant agencies, where that information may help to protect a child. The school's policies on GDPR, confidentiality and information sharing are available to parents and children on request.

### Summary

We will

- hold/store files separately, securely and confidentially
- note every Child Protection concern without delay and detail significant incidents on the front-sheet chronology; these must be regularly reviewed
- keep copies on file of all relevant referral forms, conference reports, strategy minutes etc.
- keep on file informal Child Protection information including dated notes of contacts, telephone conversations with parents and carers and other agencies
- all staff must be aware of the need to make an immediate and accurate record of concerns – using the child's own words where possible; this must be passed to the Designated Safeguarding Lead (DSL) without delay
- refer Child Protection concerns to SPOC without delay and if unsure it is Child Protection, discuss the situation via the SPOC Consultation Line. Agree who will inform the parent and carer if this 'in principle' discussion progresses to a referral and the parent or carer is unaware of your contact with SPOC.

- keep a student's records for 10 years after they leave compulsory education electronically after they have been passed onto the next educational provider

## Education

### Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation, radicalization and sexual predation-technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene and escalate any incident where appropriate. This includes when children are accessing learning from home via online platforms such as Google classrooms, when using technology purchased by the school to facilitate this learning (laptop, Wifi) and participating in live streaming and communication via this provision.

The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk

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

### Filters and monitoring

Governing boards and proprietors must be doing all that they reasonably can to limit children's exposure to the above risks from the school or colleges IT system. As part of this process governing boards and proprietors must ensure their school has appropriate filters and monitoring systems in place. Whilst considering their responsibility to safeguard and promote

the welfare of children, and provide them a safe environment in which to learn, governing boards and proprietors must consider the age range of their pupils, the number of pupils, how often they access the school's IT system and the proportionality of costs versus risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part by the risk assessment required by the Prevent Duty.

The UK Safer Internet Centre has published guidance as to what 'appropriate' might look like

<http://www.saferinternet.org.uk/advice-and-resources/teachers-and-professionals/appropriate-filtering-and-monitoring>

Guidance on e-security is available from the National Education Network-NEN. Whilst filtering and monitoring are an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors must consider a whole school approach to online safety. This will include a clear policy on the use of mobile technology in the school. Many children have unlimited and unrestricted access to the internet via 3G and 4G in particular and the school and college must carefully consider how this is managed on their premises.

Whilst it is essential that governing boards and proprietors ensure that appropriate filters and monitoring systems are in place; they must be careful that 'over blocking' does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

Parents, staff and children are prohibited from taking photographs and videos of pupils and members of staff in general circumstances without consent. For special events such as school performances this is managed in a controlled environment. Any person found in breach of these rules will be subject to a safeguarding investigation.

### **Staff training**

The school will ensure staff undergo regularly updated safeguarding training and that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

### **Information and support**

There is a wealth of information available to support schools and colleges to keep children safe online. The following is not exhaustive but will provide a useful starting point

[www.thinkuknow.co.uk](http://www.thinkuknow.co.uk)

[www.disrespectnobody.co.uk](http://www.disrespectnobody.co.uk)

www.saferinternet.org.uk  
www.internetmatters.org  
www.pshe-association.org.uk  
www.educateagainsthate.com  
www.gov.uk/government/publications/the-use-of-social-media-for-online-radicalisation

Further information can be found here:

<https://www.gov.uk/government/groups/uk-council-for-child-internet-safety-ukccis>

### **Relationships, Health and Sex Education**

All schools have the opportunity to teach safeguarding through Online safety and RHSE. The teaching of RHSE became mandatory from

September 2020. Schools must ensure that statutory content is taught and staff have access to resources and training to facilitate this subject. This includes making children aware of healthy relationships, consent, DASV, sexual harassment in all forms and online safety and how to seek help.

### **Safer Recruitment (In reference to Keeping Children Safe in Education)**

#### **Recruitment, Selection and Pre-Employment Vetting**

Our school is committed to a culture of safe recruitment and, as part of that, adopt recruitment procedures that help deter, reject or identify people who might abuse children. This part of the policy describes in detail those checks that are, or may be, required for any individual working in any capacity at, or visiting, this school. Governing bodies and schools must act reasonably in making decisions about the suitability of any prospective employee based on checks and evidence including: criminal record checks (DBS checks), barred list checks and prohibition checks together with references and interview information.

The level of DBS certificate required, and whether a prohibition check is required, will depend on the role and duties of an applicant to work in a school or college, as outlined in this policy.

For most appointments, an enhanced DBS certificate, which includes barred list information, will be required as the majority of staff will be engaging in regulated activity. In summary, a person will be considered to be engaging in regulated activity if as a result of their work they;

- will be responsible, on a regular basis in a school or college, for teaching, training instructing, caring for or supervising children

- will carry out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- engage in intimate or personal care or overnight activity, even if this happens only once

A more detailed description of regulated activity is provided in Appendix B. For all other staff who have an opportunity for regular contact with children who are not engaging in regulated activity, an enhanced DBS certificate, which does not include a barred list check, will be appropriate.

This would include contractors that would have the opportunity for contact with children and who work under a temporary or occasional contract.

In our school, a supervised volunteer who regularly teaches or looks after children is not in regulated activity. The Department for Education (DfE) has published separate statutory guidance on supervision and regulated activity which we have regard to when considering which checks must be undertaken on volunteers. This is set out at in Appendix B.

In addition to obtaining the DBS certificate described, anyone who is appointed to carry out teaching work will require an additional check to ensure they are not prohibited from teaching.

For those engaged in management roles, an additional check is required to ensure they are not prohibited under any other provisions. More information is available on the DBS website;

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/519060/Guide\\_to\\_eligibility\\_v8.1.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/519060/Guide_to_eligibility_v8.1.pdf)

When the DBS has completed its check of an applicant's PNC record and whether or not they are on the barred list, the relevant information will be recorded on a certificate (the DBS certificate) that is sent to the applicant. The applicant must show the original DBS certificate to the relevant member of staff before they take up post or as soon as practicable afterwards. We will not allow a member of staff to start work without the school having had sight of their DBS certificate or the school obtaining a separate barred list check (pending the DBS check being completed). Where an individual starts work in regulated activity before the DBS certificate is available, they will be appropriately supervised and all other checks will have been completed.

For staff who work in childcare provision or who are directly concerned with the management of such provision, the school needs to ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare (Disqualification) Regulations 2009. Further information on the staff to whom these regulations apply, the checks that will be carried out, and

the recording of those checks can be found in Disqualification under the Childcare Act 2006 statutory guidance.

If we, as a school, knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form of regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work.

### **Pre-appointment checks**

Any offer of appointment made by our school to a successful candidate, including one who has lived or worked abroad, will be conditional and only confirmed on satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will

- request a minimum of 2 references, one of which must be the candidates current/previous employer and verify that these are to the school's satisfaction
- verify a candidate's identity. Identification checking guidelines can be found on the GOV.UK website - <https://www.gov.uk/government/publications/dbs-identity-checking-guidelines>
- obtain (via the applicant) a certificate for an enhanced DBS check which will include barred list information, for those who will be engaging in regulated activity
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- for teaching staff, verify that the new candidate is not subject to a prohibition order issued by the Secretary of State, using the Employer Access Online service - <https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>
- if a new appointee is to occupy a management post in an independent school, academy or free school as an employee, is to be a trustee of an academy or free school trust, or is to be a governor or member of a proprietor body for an independent school, we will check whether the individual has been barred by the Secretary of State from taking part in the management of an independent school
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, we will follow the advice on the GOV.UK website; <https://www.gov.uk/check-job-applicant-right-to-work>

- if the person has lived or worked outside the UK, make any further checks we consider appropriate
- verify all professional qualifications in relation to teaching / working with children

### **Employment history and references**

The school will always ask for written information about previous employment history and check that information is not contradictory or incomplete. References will be sought on all short-listed candidates, including internal ones, before interview, so that any issues of concern they raise can be explored further with the referee, and taken up with the candidate at interview.

The purpose of seeking references is to obtain objective and factual information to support our appointment decisions. References will always be obtained, scrutinised and any concerns resolved satisfactorily, before the appointment is confirmed. They will always be requested directly from the referee and we will not rely on open references, for example in the form of 'to whom it may concern' testimonials. If a candidate for a teaching post is not currently employed as a teacher, we will check with the school, or local authority at which they were most recently employed, to confirm details of their employment and their reasons for leaving.

On receipt, references will be checked to ensure that all specific questions have been answered satisfactorily. The referee will be contacted to provide further clarification as appropriate: for example, if the answers are vague.

They will also be compared for consistency with the information provided by the candidate on their application form. Any discrepancies will be taken up with the candidate.

Any information about past disciplinary action or allegations will be considered carefully when assessing the applicant's suitability for the post.

### **Individuals who have lived outside the UK**

Individuals who have lived or worked outside the UK must undergo the same checks as all other staff in schools or colleges. In addition, schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered.

From 01 January 2021 the TRA Teacher Services system will no longer maintain a list of those teachers who have been sanctioned in EEA member states. Schools and colleges must make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. These checks could include, where available:

- criminal records checks for overseas applicants - Home Office guidance can be found here <https://www.gov.uk/government/publications/criminal-records-checks-for-overseas-applicants>

For teaching positions checks include;

- obtaining a letter of professional standing from the professional regulating authority in the country in which the applicant has worked. Advice about which regulatory or professional body applicants should contact is available from the National Recognition Information Centre for the United Kingdom, UK NARIC.

### **Agency and third-party staff (supply teachers)**

The school will obtain written notification from any agency that they have carried out the checks on an individual who will be working at the school that we would perform to ensure it would be appropriate for them to do so.

Where the position requires a barred list check this must be obtained, by the agency or third-party prior to appointing that individual. We must also check that the person presenting themselves for work is the same person on whom the checks have been made.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by our school, we will ensure that all necessary checks are carried out including the requesting of an enhanced DBS certificate (including and barred list information).

Where trainee teachers are fee-funded it is the responsibility of the initial teacher training provider to carry out the necessary checks, and we will obtain written confirmation from the training provider that these checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children

We will also enter details of fee-funded trainees on our single central record.

### **Existing staff**

If we have concerns about an existing staff member's suitability to work with children, we will carry out all relevant checks as if the person were a new member of staff. Similarly, if a person working at the school or college moves from a post that was not regulated activity, into work which is regulated activity, the relevant checks for the regulated activity will be carried out.

Apart from these circumstances, our school will request a renewed DBS check (with a barred list check where relevant) every 3 years.

We have a legal duty to refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult, where the individual has received a caution or conviction for a relevant offence, or if there is reason to believe that individual has committed a listed relevant offence; and that individual has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. The DBS will consider whether to bar the person. Referrals must be made as soon as possible after the resignation or removal of the individual. Guidance on referrals can be found on GOV.UK

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/501318/DBS\\_referral\\_guidance\\_completing\\_the\\_form\\_v1\\_1\\_Feb\\_16.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/501318/DBS_referral_guidance_completing_the_form_v1_1_Feb_16.pdf)

Where our school dismisses or ceases to use the services of a teacher (including an agency teacher) because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, we will consider whether to refer the case to the Secretary of State, as required by sections 141D and 141E of the Education Act 2002.

### Volunteers

**Under no circumstances will we allow a volunteer in respect of whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.**

Volunteers who on an unsupervised basis teach or look after children regularly, or provide personal care on a one-off basis in our school will be in 'regulated activity'. We will obtain an enhanced DBS certificate (which will include barred list information) for all volunteers who are new to working in regulated activity. Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information).

However, we will conduct a repeat DBS check (which will include barred list information) on any such volunteer should they have concerns.

We will also obtain an enhanced DBS certificate (not including barred list information), for volunteers who are not engaging in regulated activity, but have the opportunity to come into contact with children on a regular basis, e.g. supervised volunteers. The school is not legally permitted to request barred list information on a volunteer who, because they are supervised, is not in regulated activity.

Our school will undertake a risk assessment and use their professional judgement and experience when deciding whether to seek an enhanced DBS check for any volunteer not engaging in regulated activity. In doing so we will consider:

- the nature of the work with children

- what we already know about the volunteer, including formal or informal information offered by staff, parents and other volunteers
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability
- whether the role is eligible for an enhanced DBS check

When a Volunteer is being supervised:

- there must be supervision by a person who is in regulated activity
- the supervision must be regular and day to day
- the supervision must be 'reasonable in all the circumstances to ensure the protection of children'

The DBS cannot provide barred list information on any information, including volunteers, who are not in regulated activity.

### Governors

Governors in maintained schools are required to have an enhanced criminal records certificate from the DBS. It is the responsibility of the governing body to apply for the certificate for any of their governors who does not already have one. Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity. A section 128 direction prohibits a person from taking up a position as governor of a maintained school and will be disclosed on an enhanced DBS certificate.

### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has been subject to the appropriate level of DBS check. Contractors engaging in regulated activity will require an enhanced DBS certificate (including barred list information).

For all other contractors who are not engaging in regulated activity, but whose work provides them with an opportunity for regular contact with children, an enhanced DBS check (not including barred list information) will be required. In considering whether the contact is regular, it is irrelevant whether the contractor works on a single site or across a number of sites.

**Under no circumstances will a contractor in respect of whom no checks have been obtained be allowed to work unsupervised, or engage in regulated activity.** We are responsible for determining the appropriate level of supervision depending on the circumstances.

If a contractor working at a school or college is self-employed, the school or college must consider obtaining the DBS check, as self-employed people are not able to make an application directly to the DBS on their own account.

Schools and colleges will always check the identity of contractors and their staff on arrival at the school or college.

### Visitors

Schools and colleges do not have the power to request DBS checks and barred list checks, or ask to see DBS certificates, for visitors (for example children's relatives or other visitors attending a sports day). Headteachers and principals will use their professional judgment about the need to escort or supervise visitors.

### External provisions

The school has a range of facilities and services that are considered for safeguarding purposes. These include

- Children's Centre supporting families with children from 0-5
- nursery for children aged 3 and above
- on-site afterschool club run by an external provider (Holiplay)
- breakfast club provision run by school staff from 7.30am
- after school clubs run by external providers (Football, Tennis, Gymnastics, French)

### Single central record

Our school must keep a single central record. The single central record must cover the following people:

- all staff (including supply staff, and teacher trainees on salaried routes) who work at the school
- and all members of the proprietor/governing board

The information that must be recorded in respect of staff members (including teacher trainees on salaried routes) is whether the following checks have been carried out or certificates obtained, and the date on which each check was completed/certificate obtained

- an identity check
- a barred list check
- an enhanced DBS check/certificate

- a prohibition from teaching check
- further checks on people living or working outside the UK
- a check of professional qualifications
- a check to establish the person's right to work in the United Kingdom

For supply staff, schools will also include whether written confirmation that the employment business supplying the member of supply staff has carried out the relevant checks and obtained the appropriate certificates, whether any enhanced DBS check certificate has been provided in respect of the member of supply staff, and the date that confirmation was received.

Where checks are carried out on volunteers, schools must record this on the single central record.

Our school does not have to keep copies of DBS certificates in order to fulfil our duty of maintaining the single central record. To help our school comply with the requirements of the Data Protection Act, where we choose to retain a copy they will not be retained for longer than six months, or without the individual's consent. A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file.

## **Allegations of abuse made against teachers and other staff (including supply teachers)**

### **Duties as an employer or employee**

This part of the policy is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity.

**Allegations against a member of staff must be reported to the headteacher. Allegations against the headteacher must be reported to the chair of governors. This includes Low-level allegations which must also be reported.**

The Management of Allegations against Staff who work with Children and Young People

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1021914/KCSIE\\_2021\\_September\\_guidance.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1021914/KCSIE_2021_September_guidance.pdf) Page 95

It will be used in respect of all cases in which it is alleged that a teacher or member of staff (including volunteers) in a school or college that provides education for children under 18 years of age has

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children
- behaved in a way that indicates they may not be suitable to work with children as a transferrable risk. This includes incidents outside of school which may or may not involve children but impact upon their suitability from a safeguarding perspective. An example of this would be an incident of domestic violence within the staff member's home. There would be a concern that the member of staff could trigger this reaction again within the school community, therefore putting children at potential risk
- is inconsistent with following the code of conduct. An example of a low-level concern would be staff having favourites, taking photographs of children on their personal phone, inappropriate boundaries or language between staff and child or behaving in a way that causes a feeling of 'nagging doubt'.

This section relates to members of staff who are currently working in our school regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching will be referred to the police. Historical allegations of abuse will also be referred to the police.

Our school also has a duty of care to our employees. We will ensure we provide effective support for anyone facing an allegation and provide the employee with a named contact if they are suspended. It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in our school is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation.

### Supply Teachers

In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as 'the agency').

Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.

Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.

When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### **Initial Considerations**

The procedures for dealing with allegations need to be applied with common sense and judgement. Many cases may well either not meet the criteria set out above, or may do so without warranting consideration of either a police investigation or enquiries by local authority children's social care services. In these cases, local arrangements will be followed to resolve cases without delay.

Some rare allegations will be so serious they require immediate intervention by children's social care services and/or police. The local authority designated officer(s) (LADO) will be informed of all allegations that come to a school or college's attention and appear to meet the criteria so they can consult police and children's social care services as appropriate.

The following definitions will be used when determining the outcome 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. The term, therefore, does not imply guilt or innocence

In the first instance, the Headteacher, or where the Headteacher or principal is the subject of an allegation, the chair of governors (the case manager) will immediately discuss the allegation with the LADO. The purpose of an initial discussion is for the LADO and the case manager to consider the nature, content and context of the allegation and agree a course of action. The LADO may ask the case manager to provide or obtain relevant additional information, such as previous history, whether the child or their family have made similar allegations previously and the individual's current contact with children. There may be situations when the case manager will want to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the LADO in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern; in which case this decision and a justification for it must be recorded by both the case manager and the LADO, and agreement reached on what information will be put in writing to the individual concerned and by whom. The case manager must then consider with the LADO what action will follow both in respect of the individual and those who made the initial allegation.

The case manager will inform the accused person about the allegation as soon as possible after consulting the LADO. It is extremely important that the case manager provides them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager will not do that until those agencies have been consulted, and have agreed what information can be disclosed to the accused.

We must consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or college or whether alternative arrangements can be put in place until the allegation or concern is resolved. All options to avoid suspension will be considered prior to taking that step.

If there is cause to suspect a child is suffering or is likely to suffer significant harm, a strategy discussion will be convened in accordance with statutory guidance.

If the allegation is about physical contact, the strategy discussion or initial evaluation with the police will take into account that teachers and other school staff are entitled to use reasonable

force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where it is clear that an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case, the LADO will discuss the next steps with the case manager. In those circumstances, the options open to our school depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension must not be the default position: an individual will be suspended only if there is no reasonable alternative.

In some cases, further enquiries will be needed to enable a decision about how to proceed. If so, the LADO must discuss with the case manager how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by a senior member of the school.

However, in other circumstances, such as lack of appropriate resource within the school, or the nature or complexity of the allegation will require an independent investigator.

For low-level concerns the Headteacher will keep a record in writing for any allegations which do not meet the threshold for LADO advice or reporting. Records should be reviewed to identify patterns of concern which may reach the threshold to report. These records should be stored in line with GDPR and should be kept whilst the employee is in current employment.

### **Supporting those involved**

Our School also has a duty of care to our employees. We will act to manage and minimise the stress inherent in the allegations process. Support for the individual is vital to fulfilling this duty. Individuals will be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action, unless there is an objection by the children's social care services or the police. The individual will be advised to contact their trade union representative, if they have one, or a colleague for support. They will also be given access to welfare counselling or medical advice.

The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual, including occupational health or employee welfare arrangements. Particular care needs to be taken when employees are suspended to ensure that they are kept informed of both the progress of their case and current work-related issues. Social contact with colleagues and friends will not be prevented unless there is evidence to suggest that such contact is likely to be prejudicial to the gathering and presentation of evidence.

Parents or carers of a child or children involved must be told about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers must also be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, cannot normally be disclosed, but the parents or carers of the child must be told the outcome in confidence. In deciding what information to disclose, careful consideration must be given to the provisions of the Data Protection Act 1998, the law of confidence and, where relevant, the Human Rights Act 1998.

Parents and carers will also be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing as set out in section 141F of the Education Act 2002. If parents or carers wish to apply to the court to have reporting restrictions removed, they will be told to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, children's social care services, or the police as appropriate, will consider what support the child or children involved may need.

### **Confidentiality**

It is extremely important that when an allegation is made, we make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2002 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a pupil from the same school (where that identification would identify the teacher as the subject of the allegation). The reporting restrictions apply until the point that the accused person is charged with an offence, or until the Secretary of State publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions also cease to apply if the individual to whom the restrictions apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a judge lifts restrictions in response to a request to do so.

The legislation imposing restrictions makes clear that 'publication' of material that may lead to the identification of the teacher who is the subject of the allegation is prohibited. 'Publication' includes 'any speech, writing, relevant programme or other communication in whatever form,

which is addressed to the public at large or any section of the public'. This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). The school will ensure that all parties and witnesses are aware of the possible consequences of the 'publication' of material that may lead to the identification of the person who is subject to the allegation.

In accordance with the Association of Chief Police Officers' (ACPO) guidance the police will not normally provide any information to the press or media that might identify an individual who is under investigation, unless and until the person is charged with a criminal offence. (In exceptional cases where the police would like to depart from that rule, for example an appeal to trace a suspect, they must apply to a magistrates' court to request that reporting restrictions be lifted).

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

- who needs to know and, importantly, exactly what information can be shared
- how to manage speculation, leaks and gossip
- what, if any information can be reasonably given to the wider community to reduce speculation
- how to manage press interest if and when it should arise

## **Managing the situation and exit arrangements**

### **Resignations and settlement agreements**

If the accused person resigns, or ceases to provide their services, this will not prevent an allegation being followed up in accordance with this section. A referral to the DBS must be made, if the criteria are met. If the accused person resigns or their services cease to be used and the criteria are met it will not be appropriate to reach a settlement/compromise agreement. A settlement/compromise agreement which prevents the school from making a DBS referral when the criteria are met would likely result in a criminal offence being committed as the school or college would not be complying with its legal duty to make the referral.

It is important that every effort is made to reach a conclusion in all cases of allegations bearing on the safety or welfare of children, including any in which the person concerned refuses to cooperate with the process. Wherever possible the accused will be given a full opportunity to answer the allegation and make representations about it. But the process of recording the allegation and any supporting evidence, and reaching a judgement about whether it can be

substantiated on the basis of all the information available, will continue even if that cannot be done or the accused does not cooperate. It may be difficult to reach a conclusion in those circumstances, and it may not be possible to apply any disciplinary sanctions if a person's period of notice expires before the process is complete, but it is important to reach and record a conclusion wherever possible.

'Settlement agreements' (sometimes referred to as compromise agreements), by which a person agrees to resign if the employer agrees not to pursue disciplinary action, and both parties agree a form of words to be used in any future reference, must not be used in cases of refusal to cooperate or resignation before the person's notice period expires. Such an agreement will not prevent a thorough police investigation where that is appropriate.

### **Record keeping**

Details of allegations that are found to have been malicious will be removed from personnel records. However, for all other allegations, it is important that a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, and a note of any action taken and decisions reached, is kept on the confidential personnel file of the accused, and a copy provided to the person concerned.

The purpose of the record is to enable accurate information to be given in response to any future request for a reference, where appropriate. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time. The record will be retained at least until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

The Information Commissioner has published guidance on employment records in its Employment Practices Code and supplementary guidance, which provides some practical advice on record retention.  
[http://ico.org.uk/for\\_organisations/data\\_protection/topic\\_guides/employment](http://ico.org.uk/for_organisations/data_protection/topic_guides/employment)

### **References**

Cases in which an allegation was proven to be false, unsubstantiated or malicious must not be included in employer references. A history of repeated concerns or allegations which have all been found to be false, unsubstantiated or malicious must also not be included in any reference.

### **Timescales**

It is in everyone's interest to resolve cases as quickly as possible consistent with a fair and thorough investigation. All allegations will be investigated as a priority to avoid any delay. The time taken to investigate and resolve individual cases depends on a variety of factors including the nature, seriousness and complexity of the allegation, but these targets will be achieved in all but truly exceptional cases.

### **Target timescales**

It is expected that 80 per cent of cases should be resolved within one month and 90 per cent within three months. All but the most exceptional cases should be completed within 12 months. For those cases where it is clear immediately that the allegation is unsubstantiated or malicious, they should be resolved within one week. Where the initial consideration decides that the allegation does not involve a possible criminal offence it will be for the school to deal with it, although if there are concerns about Child Protection, we will discuss them with the LADO. In such cases, if the nature of the allegation does not require formal disciplinary action, the employer should institute appropriate action within three working days. If a disciplinary hearing is required and can be held without further investigation, the hearing should be held within 15 working days

### **Oversight and monitoring**

The LADO has overall responsibility for oversight of the procedures for dealing with allegations; for resolving any inter-agency issues; and for liaison with Croydon Safeguarding Children Board (CSCB) on the subject. The LADO will provide advice and guidance to the case manager, in addition to liaising with the police and other agencies, and monitoring the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process. Reviews will be conducted at fortnightly or monthly intervals, depending on the complexity of the case.

Police forces must also identify officers who will be responsible for

- liaising with the designated officer(s)
- taking part in the strategy discussion or initial evaluation
- subsequently reviewing the progress of those cases in which there is a police investigation
- sharing information on completion of the investigation or any prosecution

If the strategy discussion or initial assessment decides that a police investigation is required, the police will also set a target date for reviewing the progress of the investigation and consulting the

Crown Prosecution Service (CPS) about whether to: charge the individual; continue to investigate; or close the investigation. Wherever possible, that review will take place no later than four weeks after the initial evaluation. Dates for subsequent reviews, ideally at fortnightly intervals, will be set at the meeting if the investigation continues.

### **Suspension**

The possible risk of harm to children posed by an accused person will be evaluated and managed in respect of the child(ren) involved in the allegations. In some rare cases that will require the case manager to consider suspending the accused until the case is resolved. Suspension must not be an automatic response when an allegation is reported; all options to avoid suspension must be considered prior to taking that step. If the case manager is concerned about the welfare of other children in the community or the teacher's family, those concerns must be reported to the LADO or police. Suspension is highly unlikely to be justified on the basis of such concerns alone.

Suspension will be considered only in a case where there is cause to suspect a child or other children at the school are at risk of harm or the case is so serious that it might be grounds for dismissal. However, a person will not be suspended automatically: the case manager must consider carefully whether the circumstances warrant suspension from contact with children at the school or college or until the allegation is resolved, and may wish to seek advice from their HR provider and the LADO. In cases where we are made aware that the Secretary of State has made an interim prohibition order in respect of an individual at the school or college it will be necessary to immediately suspend that person from teaching pending the findings of the NCTL's investigation.

The case manager will also consider whether the result that would be achieved by immediate suspension could be obtained by alternative arrangements. In many cases an investigation can be resolved quickly and without the need for suspension. If the LADO, police and children's social care services have no objections to the member of staff continuing to work during the investigation, the case manager will be as inventive as possible to avoid suspension.

Based on assessment of risk, the following alternatives will be considered by the case manager before suspending a member of staff

- 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 to alternative work in the school or college so the individual does not have unsupervised access to children

- moving the child or children to classes where they will not come into contact with the member of staff, making it clear that this is not a punishment and parents have been consulted
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school or work for the local authority or academy trust

These alternatives allow time for an informed decision regarding the suspension and possibly reduce the initial impact of the allegation. This will, however, depend upon the nature of the allegation. The case manager will consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unsubstantiated or maliciously intended.

If immediate suspension is considered necessary, the rationale and justification for such a course of action must be agreed and recorded by both the case manager and the LADO. This must also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation must be dispatched within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for the school to leave a person who has been suspended without any support. The person will be informed at the point of their suspension who their named contact is within the school and provided with their contact details.

Children's social care services or the police cannot require the case manager to suspend a member of staff or a volunteer, although they should give appropriate weight to their advice. The power to suspend is vested in the governing body of the school who are the employers of staff at the school. However, where a strategy discussion or initial evaluation concludes that there should be enquiries by the children's social care services and/or an investigation by the police, the LADO should canvass police and children's social care services for views about whether the accused member of staff needs to be suspended from contact with children in order to inform the school consideration of suspension. Police involvement does not make it mandatory to suspend a member of staff; this decision will be taken on a case-by-case basis having undertaken a risk assessment.

### **Information sharing**

In a strategy discussion or the initial evaluation of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim.

Where the police are involved, wherever possible we will ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delay at the conclusion of their investigation or any court case.

Children's social care services should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

## **Specific actions**

### **Following a criminal investigation or prosecution**

The police should inform the school and LADO immediately when a criminal investigation and any subsequent trial is complete, or if it is decided to close an investigation without charge, or not to continue to prosecute the case after person has been charged. In those circumstances the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed. The information provided by the police and/or children's social care services should inform that decision. The options will depend on the circumstances of the case and the consideration will need to take into account the result of the police investigation or the trial, as well as the different standard of proof required in disciplinary and criminal proceedings.

### **On conclusion of a case**

If the allegation is substantiated and the person is dismissed or the employer ceases to use the person's services, or the person resigns or otherwise ceases to provide his or her services, the LADO should discuss with the case manager whether the school will decide to make a referral to the DBS for consideration of inclusion on the barred lists is required; and in the case of a member of teaching staff whether to refer the matter to the National College for Teaching and Leadership (NCTL) to consider prohibiting the individual from teaching.

There is a legal requirement for employers to make a referral to the DBS where they think that an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child.

Where it is decided on the conclusion of a case that a person who has been suspended can return to work, the case manager should consider how best to facilitate that. Most people will benefit from some help and support to return to work after a stressful experience. Depending on the individual's circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate. The case manager will also consider how the person's contact with the child or children who made the allegation can best be managed if they are still a pupil at the school or college.

### **In respect of malicious or unsubstantiated allegations**

If an allegation is determined to be unsubstantiated or malicious, the LADO should refer the matter to the children's social care services to determine whether the child concerned is in need of services, or may have been abused by someone else. If an allegation is shown to be deliberately invented or malicious, the headteacher should consider whether any disciplinary action is appropriate against the pupil who made it; or whether the police should be asked to consider if action might be appropriate against the person responsible, even if he or she was not a pupil.

### **Learning lessons**

At the conclusion of a case in which an allegation is substantiated, the LADO should review the circumstances of the case with the case manager to determine whether there are any improvements to be made to the school procedures or practice to help prevent similar events in the future. This should include issues arising from the decision to suspend the member of staff, the duration of the suspension and whether or not suspension was justified. Lessons should also be learnt from the use of suspension when the individual is subsequently reinstated. The LADO and case manager should consider how future investigations of a similar nature could be carried out without suspending the individual.

### **Music tuition**

It is recognised that music tutors are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.

Music tutors need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and

- ensure they behave in an appropriate manner and maintain professional boundaries at all times

- only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed
- make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why
- ask the child's permission first and respect their wishes
- report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken
- never travel alone with children in a car
- seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable

The school should carry out a risk assessment around providing music tuition. This should include

- providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others, for example a door with glass in it
- passing on any relevant information about children that may have a bearing on how they could react to physical contact so the tutor can adapt their practice accordingly
- letting parents know when they arrange tuition what level of physical contact may take place as part of the activity
- recording any reported incidents or issues and deal with these within the framework of the school's own policies
- ensuring music tutors are aware of the school's safeguarding and staff conduct policies prior to starting

## **Early Years settings within schools**

This section relates only to primary schools with nurseries and/or reception classes.

### **Legal and policy framework**

As an early years provider delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and Child Protection duties set out in the Childcare Act 2006 and related statutory guidance.

### **Statutory framework for the early years foundation stage**

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are Child Protection concerns.

### **Safeguarding and Child Protection**

All safeguarding and Child Protection policies listed in this policy will apply equally to children in early years settings so far as they are relevant to that age group.

In addition, the school ensures they have the following Child Protection policies

- a policy on the use of mobile phones and cameras within the early years setting; recommended policies are
- parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile
- parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose
- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room
- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting

### **Suitable people**

The school will follow the safer recruitment policy set out in section 6 of this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant qualifications.

Staff policies set out in section 6 of this policy will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive proper training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy, 'The Management of Allegations against staff who work with Children and Young People' as referred to in section 6 of this document.

Where early years staff are taking medication that may affect their ability to care for young children, this will be notified to the Headteacher.

### **Staff training, skills and supervision**

The school will ensure that

- all staff in early years settings have the relevant qualifications and skills for their role and receive the relevant induction, Child Protection and safeguarding training in line with this policy
- all policies set out in section 7 of this policy will apply equally to early years staff
- all early years staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take
- all early years staff are able to communicate effectively in English both orally and in writing
- a member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips
- each child in the early years setting has a designated keyworker who liaises with parents to provide individual support for the child

### **Staff ratios**

The school will ensure that

- staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe
- parents are kept informed of staff members and numbers
- children are kept within staff sight and hearing at all times

For nursery classes

- there will be at least one member of staff for every 13 children
- one member of staff will be a qualified teacher
- at least one member of staff will hold a full and relevant level 3 qualification

For reception classes

- class sizes will be limited to 30 pupils
- classes will be led by a qualified teacher supported by suitably qualified support staff

For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

## **Health**

The school will

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administer medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days

## **Health and safety and suitability of premises**

The school will ensure that all indoor and outdoor spaces and facilities used for early years settings are safe and fit for purpose and comply with school policies and standards for site safety and health and safety as set out section 8 of this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

## **Managing behaviour**

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened. The school will put in place a behaviour management policy, that has been agreed by the Governing Board, which follows government guidance and any use of physical intervention and restraint will be linked to the implementation of this policy.

### **Intimate care**

Staff in primary schools may need to provide intimate or personal care to younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E.

Schools must have a written policy in place in order to promote safe working practices for staff and ensure children's privacy. Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed

- staff should follow any agreed school policy or practice when providing intimate or personal care
- when taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen
- parents should always be notified if intimate care has been provided
- when providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher
- when children are changing, levels of supervision should be appropriate to the pupil's age.
- staff should avoid any physical contact unless a child needs help
- staff should ensure that changing areas are private and that others are not able to enter whilst children are changing

### **Health and safety and risk assessments**

#### **Responsibility for health and safety**

The Governing Board and Headteacher/principle will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the school environment.

Any health and safety policy adapted by the school will be based on the government guidance (link below) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.

#### **Health and safety: Advice on legal duties and powers**

Day-to-day responsibility for health and safety issues in the school will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety.

**Name: Shirley Si Ahmed**

**Designation: School Business Manager**

**Contact details: 02086884268**

### **Risk assessments**

The school will seek to identify and manage risk through the use of risk assessments. These will be carried out

- on an annual basis for the school environment as a whole
- for all school trips
- for pupils travelling between locations during the school day
- for all work-based learning or work experience placements
- when a pupil who has been excluded for risky or violent behaviour is returning to the school
- whenever there are any changes to the school environment or school practices
- following any serious incident

Consideration should also be given to conducting risk assessments before PTA and other parent led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

### **Working with aggressive and violent parents**

Where schools are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the Headteacher and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage. The Headteacher will decide whether or not contractors should be subject to DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils. Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the Headteacher will request written confirmation that relevant checks have been carried out for that individual.

All visitors and contractors will be

- informed to report to reception on arrival
- expected to provide proof of identity
- expected to wear a name-badge or carry some form of identification at all times when on the school premises
- suitably supervised by school staff at all times
- made aware of school health and safety procedures
- The Headteacher will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with school policies
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate Child Protection procedures in place and must agree with class teachers in advance what level of supervision or contact they will have regarding pupils

### **Use of the school premises by other organisations**

The school will only allow use of the school premises by other organisations schools outside of school hours for the purposes of providing supplemental schooling if;

- the school's incorporating document allows this
- the organisation provides an overview of what it intends to teach so that the Headteacher, in line with the school letting policy, is able to make a judgement on whether this is in line with the promotion of British values
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks
- reasonable due diligence checks are taken out on the organisation by the school

### **Monitoring and review**

To enable the school to monitor the safety of the premises and the school environment, as well as the implementation of policies, the Headteacher and the governing board will ensure that;

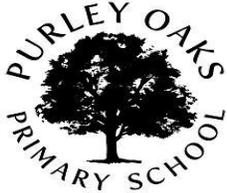
- all school policies are regularly monitored by the designated safeguarding lead and annually reviewed by the Headteacher and agreed by the governing board
- the school keeps a central record of all accidents and incidents including what action was taken and by whom
- staff are aware of their responsibility to record accidents and incidents
- the Headteacher has an overview all accidents/incidents
- serious accidents and incidents are reported to the Governing Board
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around school safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action

Appendix A

Cause for Concern form

Purley Oaks Primary School

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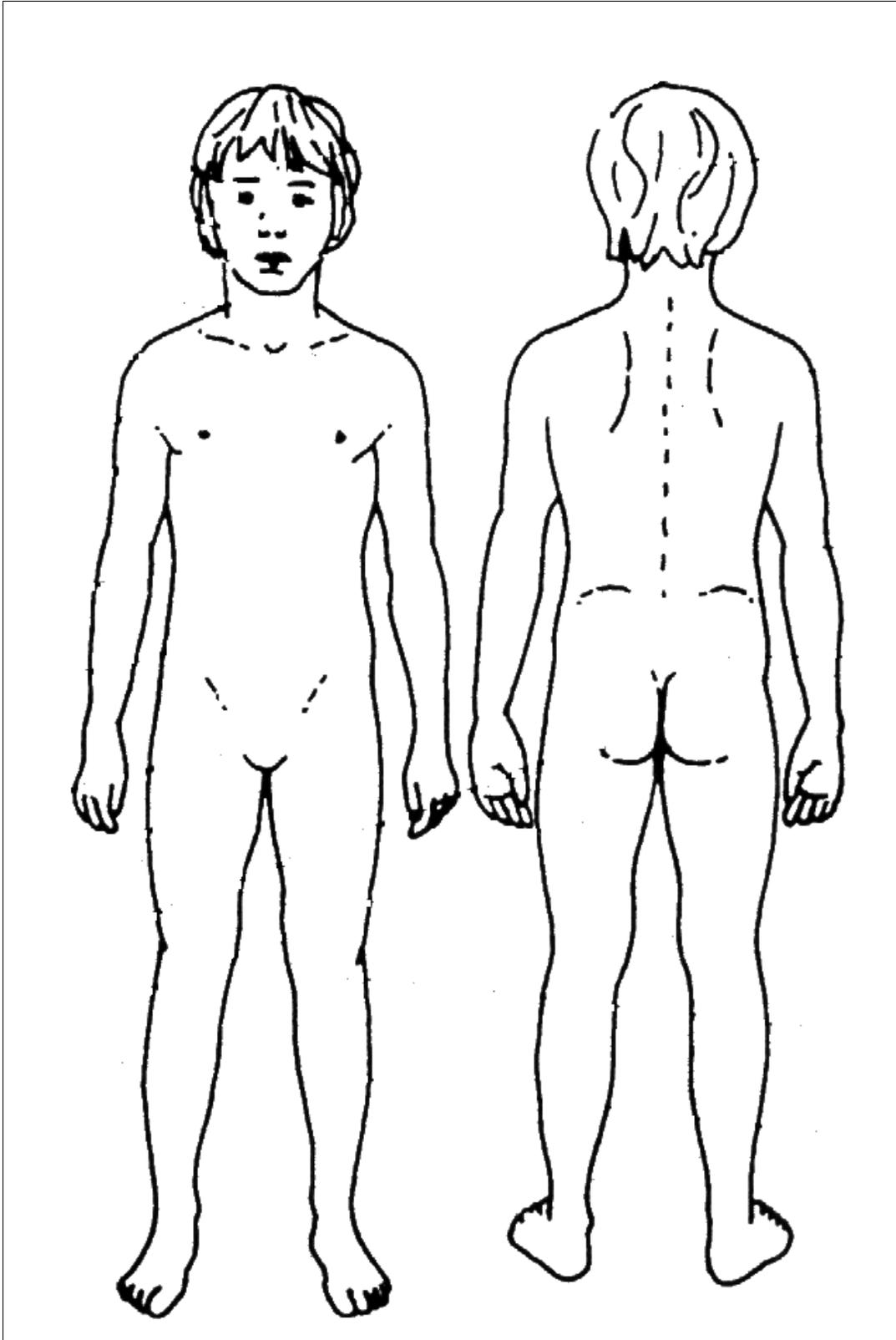


**CAUSE FOR CONCERN FORM**

If you have any initial concerns about a child, please complete this form and pass it personally within 1 hour to the named Designated Safeguarding Officer – Corinne Forde.

In her absence please pass to Richard Griffin, Rosie Ellery or Katie Beard.

PRIDE IN EXCELLENCE	
<b>Full name Of Child:</b>	<b>Class:</b>
<b>Date &amp; time (Please Include Year):</b>	
<b>Causes of Concern:</b>	
<b>Actions Taken:</b>	
<b>Person Reporting Concern:</b>	
<b>Reported to:</b>	
<b>Time received:</b>	



## REQUEST FOR INFORMATION

Child's full name:

Today's Date:

<b>Current Levels Attainment Progress</b>	
<b>How does the child present? What is their attitude and engagement with learning? Do they come to school ready to learn? (planner, uniform, homework)</b>	
<b>Attendance % Punctuality Who brings &amp; collects child?</b>	
<b>Emotional well-being and presentation (any recent changes)</b>	
<b>Parental interactions with child and staff</b>	
<b>Additional Support Given (Pastoral, ELSA, family support, SEN interventions, EHCP)</b>	
<b>External services involved (CAMHS, SALT, EP)</b>	
<b>Any additional concerns</b>	

**Appendix B - Statutory guidance – regulated activity (children) - Supervision of activity with children which is regulated activity when unsupervised.**

**Regulated activity**

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government have produced a factual note on Regulated Activity in relation to Children: scope.

Regulated activity includes:

- a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on well-being, or driving a vehicle only for children
- b) work for a limited range of establishments (known as ‘specified places’, which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers

Work under (a) or (b) is regulated activity only if done regularly. Some activities are always regulated activities, regardless of their frequency or whether they are supervised or not. This includes:

- c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:
  - personal care includes helping a child, for reasons of age, illness or disability, with eating or drinking, or in connection with toileting, washing, bathing and dressing
  - health care means care for children provided by, or under the direction or supervision of, a regulated health care professional

The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if ‘it is carried out frequently by the same person’ or if ‘the period condition is satisfied’. Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.

This statutory guidance on the supervision of activity with children which is regulated activity when unsupervised is also published separately on GOV.UK.

This document fulfils the duty in legislation that the Secretary of State must publish statutory guidance on supervision of activity by workers with children, which when unsupervised is regulated

activity. This guidance applies in England, Wales and Northern Ireland. It covers settings including but not limited to schools, childcare establishments, colleges, youth groups and sports clubs.

For too long Child Protection policy has been developed in haste and in response to individual tragedies, with the well-intentioned though misguided belief that every risk could be mitigated and every loophole closed. The pressure has been to prescribe and legislate more. This has led to public confusion, a fearful workforce and a dysfunctional culture of mistrust between children and adults. This Government is taking a different approach.

We start with a presumption of trust and confidence in those who work with children, and the good sense and judgment of their managers. This guidance applies when an organisation decides to supervise with the aim that the supervised work will not be regulated activity (when it would be, if not so supervised). In such a case, the law makes three main points

- there must be supervision by a person who is in regulated activity
- the supervision must be regular and day to day
- the supervision must be 'reasonable in all the circumstances to ensure the protection of children'

The organisation must have regard to this guidance. That gives local managers the flexibility to determine what is reasonable for their circumstances. While the precise nature and level of supervision will vary from case to case, guidance on the main legal points above is as follows.

Supervision by a person in regulated activity/regular and day to day: supervisors must be in regulated activity themselves. The duty that supervision must take place 'on a regular basis' means that supervision must not, for example, be concentrated during the first few weeks of an activity and then tail off thereafter, becoming the exception not the rule. It must take place on an ongoing basis, whether the worker has just started or has been doing the activity for some time.

Reasonable in the circumstances: within the statutory duty, the level of supervision may differ, depending on all the circumstances of a case. Organisations will consider the following factors in deciding the specific level of supervision required in an individual case

- ages of the children, including whether their ages differ widely
- number of children that the individual is working with
- whether or not other workers are helping to look after the children
- the nature of the individual's work (or, in a specified place such as a school, the individual's opportunity for contact with children)
- how vulnerable the children are (the more they are, the more an organisation might opt for workers to be in regulated activity)

- how many workers would be supervised by each supervising worker

In law, an organisation will have no entitlement to do a barred list check on a worker who, because they are supervised, is not in regulated activity.

## Examples

### Volunteer in a specific place

Mr. Jones, a new volunteer, helps children with reading at a local school for two mornings a week. Mr. Jones is generally based in the classroom, in sight of the teacher. Sometimes Mr. Jones takes some of the children to a separate room to listen to them reading, where Mr. Jones is supervised by a paid classroom assistant, who is in that room most of the time. The teacher and classroom assistant are in regulated activity. The Headteacher decides whether their supervision is such that Mr. Jones is not in regulated activity.

### Volunteer not in a specific place

Mr. Wood, a new entrant volunteer, assists with the coaching of children at his local cricket club. The children are divided into small groups, with assistant coaches such as Mr. Wood assigned to each group. The head coach oversees the coaching, spends time with each of the groups, and has sight of all the groups (and the assistant coaches) for most of the time. The head coach is in regulated activity. The club managers decide whether the coach's supervision is such that Mr. Wood is not in regulated activity.

### Employee not in a specific place

Mrs. Shah starts as a paid activity assistant at a youth club. She helps to instruct a group of children, and is supervised by the youth club leader who is in regulated activity. The youth club managers decide whether the leader's supervision is such that Mrs. Shah is not in regulated activity.

In each example, the organisation uses the following steps when deciding whether a new worker will be supervised to such a level that the new worker is not in regulated activity

- consider whether the worker is doing work that, if unsupervised, would be regulated activity. If the worker is not, the remaining steps are unnecessary
- consider whether the worker will be supervised by a person in regulated activity, and whether the supervision will be regular and day to day, bearing in mind paragraph 4 of this guidance
- consider whether the supervision will be reasonable in all the circumstances to ensure the protection of children, bearing in mind the factors set out above; and if it is a specified place such as a school

- consider whether the supervised worker is a volunteer
  - i. Safeguarding Vulnerable Groups Act 2006, amended by Protection of Freedoms Act 2012: Schedule 4, paragraph 5A: guidance must be ‘for the purpose of assisting’ organisations ‘in deciding whether supervision is of such a kind that’ the supervisee is not in regulated activity
  - ii. Safeguarding Vulnerable Groups (Northern Ireland) Order 2007, Schedule 2, paragraph 5A, is as above on guidance on ‘supervision’ for Northern Ireland.
  - iii. If the work is in a specified place such as a school, paid workers remain in regulated activity even if supervised
  - iv. In future, the Government plans to commence a statutory duty on an organisation arranging regulated activity (under the 2006 Act or 2007 Order, both as amended) to check that a person entering regulated activity is not barred from regulated activity; and plans to commence a stand-alone barring check service by the new Disclosure and Barring Service
  - v. A volunteer is, in England and Wales, a person who performs an activity which involves spending time, unpaid (except for travel and other approved out-of-pocket expenses), doing something which aims to benefit someone (individuals or groups) other than or in addition to close relatives; in Northern Ireland, a person engaged, or to be engaged, in an activity for a non-profit organisation or person which involves spending time unpaid (except for travel and other approved out-of-pocket expenses) doing something which amounts to a benefit to some third party other than, or in addition to, a close relative

## Appendix C

### Other relevant policies

Schools can access additional guidance, policies and procedures at:

*CSCB local policies and procedures*

*CSCB Safeguarding in Education Toolkit*

*DfE Alternative Provision guidance*

*DfE School Attendance guidance*

*DfE School Attendance Parental Responsibility Measures guidance*

*DfE Behaviour and Discipline in Schools guidance*

*DfE Preventing and Tackling Bullying guidance*

*DfE Children Missing Education guidance*

*DfE Best Practice Advice for School Complaints Procedures*

*DfE and ACPO Drug Advice for School guidance*

*DfE Advice for Schools on Equality Act 2010*

*DfE Exclusion from maintained schools, academies and PRUs in England*

*DfE Supporting pupils at school with medical conditions*

*DfE Guidance on First Aid for Schools*

*DfE Mental health and behaviour in schools*

*DfE Use of reasonable force guidance*

*DfE Promoting fundamental British values as part of SMSC in Schools*

*DfE The Prevent Duty – Advice for Schools*

*DfE Sexual violence and sexual harassment between children in schools and colleges*

*DfE Children who run away or go missing from home or care*

*Child sexual exploitation – DfE guidance*

*Preventing youth violence and gang involvement*

*Safeguarding children who may have been trafficked*

*Criminal Exploitation of children and vulnerable adults: County Lines guidance*

**Appendix D - checklist**

<b>Requirement</b>	<b>Yes</b>	<b>No</b>
<b>Leadership and the safeguarding and Child Protection framework</b>		
<i>The school has comprehensive safeguarding policies covering Early Help and Child Protection and a staff conduct policy covering use of technology, relationships with pupils, communications and use of social media</i>		
<i>The school has agreed procedures for dealing with incidents of sexual violence and sexual harassment that are linked to the school's behaviour and bullying policies</i>		
<i>There are agreed local procedures in place for making referrals to SPOC where there are concerns about the safety and welfare of a child</i>		
<i>There is a designated governor with responsibility for safeguarding and Child Protection</i>		
<i>A senior member of the leadership team has been appointed as the designated safeguarding lead and a nominated deputy to carry out the role in their absence and they have the time and resources allocated to carry out their responsibilities</i>		
<i>The safeguarding lead and their deputy have received safeguarding and Child Protection training at the appropriate level on appointment and this training is updated every 2 years.</i>		
<i>Arrangements are in place to ensure staff can liaise with the safeguarding lead or their deputy at all times during school hours</i>		
<i>The school promotes a multi-agency approach to safeguarding and Child Protection in line with Working together and staff are able to attend Child Protection conferences and other multi-agency meetings as appropriate</i>		
<i>The curriculum offers opportunities for pupils to learn how to keep themselves safe, including online, and offers pupils guidance on healthy relationships</i>		
<i>The school promotes positive behaviour and this is reflected in behaviour management strategies used; reasonable force and restraint is used only in line</i>		

<i>with legislation; use of any behaviour management strategy is tailored to the needs of the pupil and carefully monitored for effectiveness</i>		
<i>The school has effective policies for dealing with bullying and discrimination, including cyberbullying, sexting and inappropriate language</i>		
<i>There is a policy around dealing with allegations against staff and all staff are aware of the policy and know what action to take if they have concerns about another member of staff</i>		
<i>The school has a policy of openness and challenge and staff and pupils feel safe to raise concerns; there is a whistleblowing policy in place and all staff and pupils know who to contact if they are concerned that safeguarding issues are not being adequately dealt with by the school</i>		
<i>The school has an internet safety policy setting out how pupils will be kept safe online and the standards for use of technologies expected from pupils and staff including mobile devices; all pupils and staff have signed an acceptable use agreement</i>		
<i>The school have taken steps to implement the Prevent duty and staff are aware of how to make appropriate referrals to Channel Panel</i>		
<i>The school has a policy on dealing with children who harm other children and all staff are aware of what action to take under this policy</i>		
<i>The school seeks the views of pupils and parents with regard to safeguarding issues and all safeguarding and Child Protection policies are available on the school website</i>		
<b>Staff knowledge and e safeguarding practice</b>		
<i>All staff are inducted in safeguarding arrangements in the school and have received and read all relevant policies</i>		
<i>All staff have received safeguarding and Child Protection training at the appropriate level on appointment and this training is updated every 3 years.</i>		
<i>All staff receive regular updates to safeguarding and Child Protection legislation via the designated safeguarding lead as required</i>		

<i>All staff are able to identify those children who may benefit from Early Help and are able to provide support within the school or make appropriate referrals to Croydon's Early help service</i>		
<i>All staff are able to recognise the indicators of abuse and harm, can identify children who may be at risk of harm</i>		
<i>All staff know what action to take to refer children appropriately to SPOC where there are concerns and make timely referrals and follow up referrals where it is thought the child's situation is not improving</i>		
<i>All staff are aware of their legal duty under the mandatory reporting rules for FGM and can make appropriate notifications to the police and SPOC in known cases of FGM</i>		
<i>All staff are aware of what actions to take when a child goes missing from education or does not attend and that missing episodes are monitored; all staff are aware of the link between going missing and safeguarding issues such as sexual exploitation, criminal behaviour, substance misuse and trafficking; there are procedures in place to notify Croydon where a child is removed from the school roll in line with the local Children missing from school policy</i>		
<i>All staff are able to share information lawfully and appropriately and work jointly with partner agencies; parents are informed of concerns and actions taken unless this puts the pupil at further risk</i>		
<i>Records of concerns and referrals are up to date and timely and kept securely</i>		
<i>All staff receive regular supervision that enables them to raise safeguarding issues</i>		
<i>Risk assessments are routinely carried out to ensure the health and safety of pupils on site, on school trips and during work experience</i>		
<i>Pupils feel safe and are aware of how to raise concerns and complaints with a trusted adult</i>		
<b>Safer recruitment</b>		
<i>The school has a safer recruitment procedure that is in line with statutory requirements</i>		
<i>The school has a single central record providing details of when and by whom the following checks on candidates were taken out:</i>		

<ul style="list-style-type: none"> <li>● <i>Identity checks</i></li> <li>● <i>DBS/barred list checks</i></li> <li>● <i>Prohibition from teaching/section 128 checks</i></li> <li>● <i>Appropriate checks with overseas organisations where the candidate is from abroad</i></li> <li>● <i>Checks to establish right to work in the UK</i></li> <li>● <i>Professional qualifications check</i></li> </ul>		
<p><i>The school has a clear system in place in line with statutory requirements for volunteers or contractors coming into the school, .Enhanced DBS checks are taken out on all staff members, volunteers and governors; barred list checks are also taken out on staff, volunteers and governors who are involved in regulated activity</i></p>		
<p><i>The Headteacher or other member of the senior leadership team decides on whether or not volunteers, visitors or contractors require a DBS check and this decision is informed by a risk assessment; arrangements are put in place to supervise and oversee volunteers, visitors and contractors where a DBS check is not carried out and children are not left unsupervised with any individual who has not undergone a DBS check</i></p>		
<p><i>The school seeks written confirmation from agencies that these checks have been taken out on all agency and supply staff prior to appointment; all agency and supply staff are required to present proof of identity prior to beginning work</i></p>		
<p><i>A member of the governing board and senior leadership team involved in interviewing has completed an accredited safer recruitment training course</i></p>		
<p><b><i>Dealing with allegations against staff</i></b></p>		
<p><i>There is a named staff member with responsibility for liaising with the police and LADO</i></p>		
<p><i>Appropriate referrals are made to the DBS where staff cease to work at the school following investigation into allegations</i></p>		

