

# GREENSIDE FILM FACTORY

## Child Protection Policy



**September 2019**

Child Protection Policy

The Governing Body of Greenside School adopted this policy on 1<sup>st</sup> Sept '17.

Updated 1<sup>st</sup> Sept '19 to include Keeping Children Safe in Education –  
Guidance with effect 1st Sept '19

## Greenside Child Protection Policy

### School Statement of Student Safety and Welfare

In line with the Government's vision for all services for children and young people, "Keeping children safe 2015" and the updated "Guidance with Effect from 5<sup>th</sup> Sept '16, the governors and all Greenside staff recognize that students have a fundamental right to learn in a safe environment and to be protected from harm.

Young people are less likely to learn effectively and to go on to lead positive and independent lives if they are not kept healthy and safe. Greenside is, therefore, committed to providing an environment which is safe and where the welfare of each student is of paramount importance. This will include a commitment to ensuring that all students feel confident that any concerns they may have will be listened to and acted upon.

To this end, governors and staff will be committed to ensuring that all members of the school community are aware of school responsibilities and procedures in this area. This will include communicating policies and procedures effectively with parents/carers, ensuring all staff and relevant governors attend appropriate training and working effectively with other professionals on behalf of students in need or enquiring into allegations of child abuse.

The Governors and Greenside Leadership Group will ensure that the school carries out its statutory duties to report suspected abuse following agreed Local Safeguarding Children Board procedures and to assist the agencies acting on behalf of children in need when they are enquiring into allegations of child abuse.

#### Aims of this policy are:

- ❖ To raise awareness of all Greenside staff of the importance of safeguarding and child protection and of their responsibilities for identifying and reporting actual or suspected abuse
- ❖ To ensure students and parents/ carers are aware that Greenside takes child protection seriously and will follow the appropriate procedures for identifying and reporting abuse and for dealing with allegations against staff
- ❖ To promote effective liaison with other agencies in order to work together for the protection and welfare of all students
- ❖ To support students' development in ways that will foster security, confidence and independence
- ❖ To integrate a child protection curriculum within the existing curriculum, allowing for continuity and progress through all key stages
- ❖ To take account of policies in related areas such as positive behaviour management and our anti-bullying work.

All staff will have access to the London Borough of Hammersmith and Fulham Centrally Retained Education Welfare Advisory Service Manual May 2012 'Managing School Attendance & Safeguarding'.  
Tel: 020 8753 2862

#### Designated safeguarding lead (DSL)

The DSL should be a member of the senior leadership team and take lead responsibility for safeguarding. Schools may also decide to have one or more deputy DSLs. The DSL and/or a deputy should always be available to staff during school hours.

At Greenside the DSL will be Robin Yeats and Georgina Webber from Sept '17

#### Safeguarding training

In addition to existing safeguarding training requirements, the knowledge and skills of the DSL and any deputies should be updated at least annually. Staff should also receive safeguarding updates at least annually.

#### Safer recruitment

Section 128 direction checks are required for governors and staff involved in the management of an independent school, including academies and free schools. These checks are also covered by barred list checks.

Employer Access Online has been replaced by the Teacher Services system, which can be used to carry out prohibition from teaching and section 128 direction checks.

The updated guidance also has more information about checks on individuals who have lived or worked outside the UK.

### **Reporting and recording concerns**

All staff need to be aware of the early help process and be prepared to identify children who may benefit.

The guidance distinguishes between a 'concern' about a child and 'immediate danger or risk of harm'.

Concerns should be discussed, if possible, with the DSL, and a course of action decided on. Where a child is in immediate danger or at risk of harm, a referral should be made to children's social care and/or the police immediately. Anyone can make a referral. In both cases, staff making a referral should inform the DSL as soon as possible.

All concerns, discussions and decisions should be recorded in writing. Staff should know how to maintain an appropriate level of confidentiality while liaising with relevant professionals.

### **Online safety**

Schools should ensure appropriate filters and monitoring systems are in place to protect students from inappropriate and harmful online material. Schools should consider a whole-school approach to online safety, including a clear policy on the use of mobile technology.

### **Teaching students about safeguarding**

Schools should now teach students about safeguarding, including staying safe online.

### **Specific safeguarding issues**

There is more information about specific safeguarding issues including children missing in education, female genital mutilation (FGM) and radicalization in annex A of the new guidance.

### **Guiding Principles for Intervention to Protect Students**

The Governors and Greenside Leadership Group will ensure that the principles below, which derive from the Children's Act 1989, form the basis of our child protection policy and procedures and are followed by all staff.

- ❖ All students have a right to be protected from abuse
- ❖ Child abuse can occur in all cultures, religions and social classes
- ❖ Staff must be sensitive to the many differing factors which may need to be taken into account, depending upon the student's cultural and social background
- ❖ It is important to ensure that the student has the opportunity to express her/ his view and is listened to carefully
- ❖ The primary concern at all stages must be the safety and welfare of the student. Where there is a conflict of interests between the student and parent/ carer, the interests of the student must be paramount.
- ❖ Students who have been abused need the same care and sensitivity regardless of whether they have been abused by a parent/ carer or a stranger.
- ❖ The responsibility to refer to the Child Protection Officer students thought to be at risk rests with the individual who identifies the concern
- ❖ The concept of working in partnership with those who hold parental responsibility for a student must provide a framework for procedures

### **Child Protection Definitions**

Neglect – Persistent or severe failure to meet a child's physical and/or psychological needs resulting in impairment of the child's health or development

Physical abuse – Actual or likely physical injury to a child, or failure to prevent physical injury or suffering

Sexual – Actual or likely exploitation of a child by involvement in sexual activities of any kind

Emotional – persistent emotional ill treatment of a child causing severe and persistent adverse effects on the child's emotional development

Potential abuse – situations where children may not have been abused but where social and medical assessments indicate a high degree of risk that they might be abused in the future, including situations where another child in the household has been abused or where there is a known abuser.

The signs of possible abuse include:

#### Neglect

Constant hunger or tiredness, frequent lateness or absence, poor personal hygiene, untreated medical problems, running away, stealing, low self-esteem, reported or suspected exposure to domestic violence

#### Physical

Unexplained injuries/bruises, improbable or evasive excuses, untreated injuries, fear of treatment or medical help, fear of physical contact, fear of going home, over-aggressive or defensive tendencies, fear of removing clothes, bite marks, burns or cuts, unexplained facial injuries, including haemorrhages behind the eye, also if it is suspected that a student has undergone Female Genital Mutilation. Special consideration should be given to a student who has returned from a holiday from one to the countries practicing FGM: showing signs of change of personality; withdrawn, tearful, not wanting to participate in PE, frequently asking to use the bathroom etc. All concerns regarding FGM **must** be reported to the Greenside DSL immediately.

#### Sexual

Tendency to cling, tendency to cry, genital itching, acting 'like a baby', distrust of familiar adults, wetting and/or soiling, fear of undressing, throat infections, depression, fearful behaviour or panic attacks over-sexualized and inappropriate behaviour and/or language with peers/adults

#### Emotional

Physical, emotional, developmental delay, over-reaction to mistakes, tearfulness, fear of losing, fear of parents being contacted, stealing, thumb-sucking, rocking, anxiety, reported or suspected witnessing of scenes of domestic violence. Signs of Munchausen Syndrome by Proxy (if a parent of a child deliberately fabricates or induces illness in that child), which may include, perceived illness, frequent changes of doctor, enforced illness, fabricated illness. Child may exhibit unusual or unnaturally prolonged illness and symptoms/signs of illness can have a temporal association with mother's presence.

#### Extremism

Protecting children from the risk of radicalisation should be seen as part of schools' 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 managing other safeguarding risks, staff should be alert to changes in children's behaviour which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act appropriately which may include making a referral to the Channel programme

(\*) Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. We also include in our definition of extremism calls for the death of members of our armed forces, whether in this country or overseas. Keeping Children safe in education 2015 (see updated guidance – 5<sup>th</sup> Sept '16)

All agencies receiving information in the context of a child protection enquiry must treat it as Confidential. They must only disclose the information to those who need to know.

**All of the policy statements below should be read in conjunction with KCSiE – 5<sup>th</sup> Sept guidance)  
Responsibilities of the Designated Child Protection School Professional**

The Governors and Greenside Leadership Group will ensure that Greenside has identified a designated member of the teaching staff for child protection and that the designated staff member is aware of and acts on the following responsibilities:

- ❖ Ensure staff are familiar with Greenside, LA and TEF guidelines for identifying and reporting abuse, including allegations of abuse against staff
- ❖ Ensure staff are familiar with the school, LA and TEF guideline for identifying and reporting Radicalisation.
- ❖ Designated lead or deputies to immediately seek advice from the Executive Head and then from the front door team at Children's Services. The police should be contacted if this advice is not available (with permission from the Executive Head)
- ❖ Ensure staff including temporary staff and those who start mid-year, receive foundation training in child protection and that this is reviewed every two years
- ❖ Be responsible for coordinating action and liaising with other agencies and support services over child protection issues
- ❖ Assist Social Services and other appropriate involved agencies in any enquiries into allegations of child abuse. This will include Greenside being represented at Child Protection Conferences and Core Group Meetings, Child in Need Meetings and any other professional meetings involving child protection issues.
- ❖ Follow as appropriate recommendations made by the Local Safeguarding Children Board (LSCB) guidance and London Child Protection Procedures.
- ❖ Be aware of Every Child Matters and What to do if you are worried a student is being abused and any other legislation, guidance, policy and procedures in the area of safeguarding and child protection including new legislation
- ❖ Monitor the attendance and development of students on the child protection register
- ❖ Maintain rigorous child protection records in chronological order and send onto new schools
- ❖ Organize annual whole staff meetings in order to support and advise staff on child protection issues generally
- ❖ Ensure that information regarding child protection cases/concerns/disclosures is disseminated appropriately between agencies and to all those involved the education, care and welfare of the student concerned but with direct and appropriate regard for the issues of confidentiality especially when staff are drawn from the local community
- ❖ Ensure policy is followed in relation to cases of potential abuse, FGM, radicalization, students missing in education, neglect or any other related aspect of Child Protection – we always are on the side of caution and treat every concern seriously.

### **Responsibilities of Greenside staff**

The Governors and Leadership Group recognize that all members of the Greenside staff have a responsibility to identify and report suspected abuse and to ensure the safety and well being of the students in our school. In doing so they should seek advice and support as necessary from the designated child protection officer and other senior staff members where appropriate or necessary.

Staff are expected to provide a safe and caring environment in which students can develop the confidence to voice ideas, feelings and opinions. Students should be treated with respect within a framework of agreed and understood behaviour.

### **All school staff are expected to:**

- ❖ Be able to identify signs and symptoms of abuse
- ❖ Report concerns (including concerns about other staff/professionals) to the designated teacher or other senior staff members where appropriate
- ❖ To feel able to report any child protection concerns irrespective of how minor the issue may appear to be; if in doubt share
- ❖ Be aware of and follow the relevant guidelines from relevant local procedures and guidelines from the Local Safeguarding Children Board
- ❖ Know to whom and how to report allegations against other staff following the guidelines issued by the LA/ TEF

- ❖ Monitor and report as required on the welfare, attendance and progress of students on the Child Protection Register
- ❖ Ensure that reported concerns are appropriately recorded and documented by the designated child protection officer
- ❖ Where appropriate keep clear, dated, factual and confidential records of child protection concerns e.g. clear information and what and when reported to designated staff member

### **Dealing with disclosures**

- ❖ Stay calm and sympathetic
- ❖ Listen to what you are being told without displaying shock or disbelief.
- ❖ Be observant and attentive
- ❖ Do not be judgmental about the student, alleged perpetrator, the student's home, family and culture
- ❖ Do not ask questions which may mislead or interrogate
- ❖ Reassure the student that she/ he was right to talk to you and that they can say as much as they need to but...
- ❖ Do not dismiss the disclosure
- ❖ Do not make promises that cannot be followed
- ❖ Do not promise confidentiality
- ❖ Explain clearly and gently what will need to happen next

### **Appointment of staff, permanent and temporary**

The Governors and Greenside Leadership Group will, when appointing staff, take account of the guidance issued by the Department for Education Safer Recruitment and ensure that Greenside observes rigorously the following safeguards:

- ❖ Documentation sent out to potential candidates will make it clear that child protection is a high priority at Greenside and that rigorous enhanced DBS checks will be made of any candidates before appointments are confirmed
- ❖ All references will be taken up and verified by telephone referees
- ❖ A reference will always be obtained from the last employer
- ❖ At interview candidates will be asked to account for any gaps in their career/employment history
- ❖ Candidates will be made aware of systems established within Greenside for retaining records
- ❖ That evidence of relevant checks will be recorded and stored in a single, central location, easily accessible when appropriate and necessary

### **Allegations against staff**

The Governors recognize that because of the daily contact with students in a variety of situations, including the caring role, teachers and other staff are vulnerable to accusations of abuse and that Guidelines for Safe Practice should be adhered to. Greenside has adopted the LA Guidelines.

Governors further recognize that, regrettably, in some cases, such accusations may be true. The governors, therefore, expect all staff to follow the agreed procedures for dealing with allegations against staff. This will initially mean a discussion with the Executive Head / Designated Teacher or, if appropriate other senior members of staff.

### **Staff contact with students**

To minimize the risk of accusations being made against staff, Governors and the Leadership Group will ensure that staff are aware of and following LA Guidelines on the Use of Control and Physical Restraint by Staff together with guidance given in Section 8 of the DfE publication Child Protection: A Practical Guide for all Staff Working in Education Establishments – adopted in our Greenside Policy.

Governors will also ensure, through the Leadership Group, that staff follow the DfE Guidance and Procedures for School Visits – adopted in our Greenside Policy

Greenside procedures will also ensure that all visitors to our site sign the visitors' book make immediate contact with a member of the Office staff and are accompanied to the member of staff receiving the visitor. If a member of the Office staff is not available, other senior staff or identified staff member will manage the arrival of the visitor appropriately. Visitors, temporary staff, and visiting governors will wear appropriate ID at all times.

Unscheduled visits and changes to student dropping off and picking up will be managed appropriately by the Office Staff and communicated appropriately. Where a member of the Office staff is not available other senior staff or designated staff member will manage the above.

Temporary/supply staff on site will be expected to follow the same guidelines and procedures as permanent staff. Where any concerns are raised about the behaviour towards students temporary/supply staff will inform a member of Leadership Group and/or designated child protection officer immediately and the individual will be asked to leave the premises immediately and her/ his agency informed.

### **Curriculum**

The Governors and Leadership Group believe that the school curriculum is important in the protection of students. The aim will be to development a curriculum that meets the following objectives:

- ❖ Develops and enhances student self-esteem
- ❖ Develops and enhances communication skills
- ❖ Informs students about all aspects of risk to personal safety
- ❖ Develops and enhances strategies for self-protection
- ❖ Develops and enhances student understanding of what is and what is not appropriate adult behaviour
- ❖ Develops and enhances non-abusive behaviour between students

### **Students with Special Educational Needs and Disabilities**

The Governors and Leadership Group recognize that students with special educational needs may be especially vulnerable to abuse and expect staff to take extra care to interpret correctly apparent signs of abuse or neglect. Indications of abuse will be reported in the same way as for other students.

In line with the DfE Circular 10/95 Governors and Leadership will provide a school environment in which students with special educational needs feel confident and able to discuss their concerns. Where necessary, students will be given an opportunity to communicate with a member of staff with appropriate training in specific communication skills.

### **Communicating with parents/ carers**

Parents/carers will be made aware of this policy and Greenside's procedures for dealing with child protection issues.

### **Monitoring the effectiveness of this policy**

Governors expect the SENCo to report annually on the effectiveness of the school's Safeguarding and Child Protection policy and procedures and to raise as a matter or routine any issues that arise as a result of the inadequate implementation of the policy and procedures. She will also meet each term with the Governor with specific responsibility for this area.

More detailed guidance can be found on-line in the London Child Protection Procedures.

### **Roles and Responsibilities**

Greenside School Designated Safeguarding & Child Protection Officers:  
Georgina Webber and Robin Yeats

Intervention Leader and SENCo:

Inclusion Leader: Caroline Allen

The Executive Head & Deputies & SENCo have responsibility for Safeguarding and Child Protection.

The Governing Body Safeguarding Lead is: Jem Shuttleworth (Chair of Governors)

## Keeping Children Safe in Education (KCSIE): changes from September 2019

### 4 key actions for you to take

Read about the details in the sections below, your key actions from the changes are:

- Include **upskirting** and **serious violent crime** in your safeguarding training in September.
- Carry out **section 128** checks on your maintained school governors if you haven't already
- Know and follow the **new local arrangements** set by your safeguarding partners
- Use the Department for Education's (DfE) new **online safety guidance**

### Part 1 - information for all staff

All staff working in schools are required to read at least part 1 of [Keeping Children Safe in Education](#) (KCSIE). Here are the main changes to part 1.

#### Upskirting is now a form of peer-on-peer abuse

It's a criminal offence and is now listed in paragraph 27.

**Definition:** upskirting is typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm.

#### New information on serious violent crime (29-30)

The new text says that all staff need to know the indicators that may signal that children are at risk from, or are involved with, serious violent crime. Including:

- Unexplained gifts/new possessions - these can indicate children have been approached by/involved with individuals associated with criminal networks/gangs
- Increased absence from school
- Change in friendship/relationships with others/groups
- Significant decline in performance
- Signs of self-harm/significant change in wellbeing
- Signs of assault/unexplained injuries

Staff should also be aware of the associated risks and understand the measures in place to manage them.

### Part 2 - the management of safeguarding

This is for headteachers, designated safeguarding lead (DSL) teams and governors.

Multi-agency working (68-75)

Changes to this section are to clarify the expectations for all agencies, including schools, in the context of the phasing out of local safeguarding children boards (LSCBs).

Specifically that:

- The new safeguarding partners and child death review partner arrangements must be in place by **29th September 2019**
- Your school should be aware of and follow these new local arrangements - this includes your senior leadership team, DSL and governing board

As a reminder, your 3 safeguarding partners are:

- Local authority (LA)
- Clinical commissioning group within the LA
- Chief office of police within the LA

### Reference to new relationships, health and sex education (89)

Under the context of 'Opportunities to teach safeguarding' there's now text explaining that the following subjects will be mandatory from September 2020:

- Relationships education (for all primary schools)
- Relationships and sex education (for all secondary schools)
- Health education (for all students in state-funded schools)

### Part 3 - safer recruitment

Maintained school governors (173-174)

The guidance now clarifies that:

- Maintained schools should carry out section 128 checks on their governors
- Associate members don't need to have an enhanced DBS check

### Overview

Keeping Children Safe in Education is organised into 5 parts:

1. Safeguarding information for all staff (all staff in all schools must read **at least** this part)
2. The management of safeguarding
3. Safer recruitment
4. Allegations of abuse made against teachers and other staff
5. Child-on-child sexual violence and sexual harassment

**All** school and college staff have a responsibility to provide a safe environment in which children can learn.

You should also:

- Be aware of systems within your school which support safeguarding and have these explained to you during induction. This includes the:
  - Child protection, student behaviour and staff behaviour policies
  - Safeguarding response to children who go missing from education
  - Role and identity of the designated safeguarding lead (DSL) and any deputies
- Be aware of the early help process and your role in it, and be prepared to identify children who may benefit from early help
- Be aware of the process for making referrals to children's social care and for statutory assessments that may follow a referral, and of your role in these assessments
- Receive appropriate child protection training which is regularly updated, and child protection updates (for example, via email, e-bulletins and staff meetings)
- Be aware of the signs of abuse and neglect, and of what to do if a child makes a disclosure
- Know how to manage the requirement to maintain an appropriate level of confidentiality (i.e. only involving those who need to be involved)
- Never promise a child that you won't tell anyone about a report of abuse
- Always act in the best interests of the child

### Actions to take where staff have concerns about a child

If you have concerns about a child, you should act **immediately**. You should follow your school's child protection policy and **speak to your DSL** (or deputy) about what action to take, including whether a referral needs to be made.

The options after you have spoken to the DSL about a concern include:

- Managing any support for the child internally via your school's own pastoral support processes
- An early help assessment
- A referral for statutory services

If the DSL or deputy is not available, you should:

- **Not delay** taking action
- Consider speaking to a member of your senior leadership team and/or take advice from local children's social care
- Share any action taken with the DSL or deputy as soon as is practically possible

If you believe a child is in immediate danger or at risk of harm, you should make a referral to children's social care (and the police if appropriate) **immediately**.

All concerns, discussions and decisions made, and the reasons for those decisions, should be recorded in writing. Staff should discuss any uncertainties about recording requirements with the DSL or deputy.

All staff should speak to the DSL or deputy regarding concerns about female genital mutilation (FGM), and there is a specific legal duty on **teachers** – where a teacher discovers that FGM has been carried out on a girl under the age of 18, they **must** report this to the police.

## Poor practice

Examples of poor practice include:

- Failing to act on early signs of abuse and neglect
- Poor record keeping
- Failing to listen to the views of the child
- Failing to reassess concerns where the situation does not improve
- Not sharing information
- Sharing information too slowly
- Failing to challenge those who are not taking action

Concerns about staff members posing a risk of harm to children

If you have safeguarding concerns, or an allegation is made about another member of staff (including volunteers) posing a risk of harm to children, you should refer this to your headteacher or principal.

If your concerns/the allegations relate to the headteacher or principal, you should refer this to your chair of governors.

Where the headteacher is also the sole proprietor of an independent school, you should report allegations directly to the designated officer at your local authority.

Concerns about safeguarding practices within your school or college

Your school or college should have appropriate whistleblowing procedures in place for you to raise any concerns about poor or unsafe practice with the senior leadership team.

If you feel unable to raise an issue with your employer, or you feel that your genuine concerns are not being addressed, you can contact the [NSPCC whistleblowing helpline](#).

## Types of abuse and neglect

- Abuse
- Physical abuse
- Emotional abuse
- Sexual abuse
- Neglect

Specific safeguarding issues

All staff are expected to be aware of safeguarding issues such as drug use, child sexual exploitation and radicalisation.

Staff should also know that safeguarding issues can manifest via peer-on-peer abuse, including (but not limited to):

- Bullying (including cyberbullying)
- Physical abuse
- Sexual violence and sexual harassment

- Sexting
- Initiation/hazing type violence and rituals

Assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare ('contextual safeguarding').

## 2. Part 2: the management of safeguarding

### *The DSL*

Governing boards must appoint a senior member of staff as the DSL. This person has lead responsibility for safeguarding, and this duty should be explicit in their job description. The DSL, or a deputy DSL, must always be available to staff during school hours.

### *Board level lead for safeguarding – this is the Trust level for us (TEF)*

As well as the DSL, who is the professional lead for safeguarding, schools should have a senior board level (or equivalent) lead to take leadership responsibility for the organisation's safeguarding arrangements. This can be a member of staff, but if so that person **must** be a member of the board as well (for example, the headteacher or a staff governor).

This must be a separate person from the DSL, in order to ensure there is sufficient challenge to the organisation's safeguarding arrangements and performance.

### Safeguarding policies

Governing boards should ensure that an effective child protection policy and staff behaviour policy or code of conduct are in place.

These policies should be provided to all staff on induction. Headteachers should ensure that policies and procedures are followed by all staff, particularly concerning referrals of cases of suspected abuse and neglect.

The child protection policy should:

- Describe procedures which are in accordance with government guidance
- Refer to locally agreed multi-agency procedures put in place by the 3 safeguarding partners (see under the subheading "Multi-agency working" below for more details on the safeguarding partners)
- Be updated annually (as a minimum)
- Be publicly available via the school website or other means
- 

**All** schools should have their own individual child protection policy. Multi-academy trusts can have overarching policies, but these must be built on locally to ensure local procedures and protocols can be reflected.

The staff behaviour policy or code of conduct should cover acceptable use of technologies, relationships between staff and pupils, and communications including the use of social media.

The guidance document as a whole also highlights other safeguarding policies and procedures schools should have in place, relating to:

- Whistle-blowing
- Peer-on-peer abuse
- Children who go missing from education
- Recruitment and selection
- Allegations against staff and volunteers in school
- Making referrals to the Disclosure and Barring Service (DBS)
- Work experience
- Radicalisation
- The use of mobile technology in school

Schools don't need to have separate written documents covering these issues, but can include them within their child protection policy or other policies.

### **Multi-agency working**

Schools should work with other agencies, such as social care, the police and health services, as part of safeguarding efforts and as set out in [Working Together to Safeguard Children](#).

This work includes:

- Providing a co-ordinated offer of early help where needs are identified
- Contributing to inter-agency plans to support children who are subject to child protection plans
- Allowing access for children's social care to conduct section 17 or 47 assessments

As per the updated Working Together to Safeguard Children 2018 guidance, Keeping Children Safe in Education identifies 3 safeguarding partners you'll be expected to work with going forward:

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

If the safeguarding partners name your school as a relevant agency (i.e. they believe your involvement may be required to safeguard and promote the welfare of children with regard to local need), you'll be under a statutory duty to co-operate with their published arrangements (which should be in place by 29 September 2019)

Your governing board should:

- Ensure arrangements are in place that set out clearly the process and principles for sharing information within your school or trust, and with the 3 safeguarding partners or other agencies as required
- Be prepared to supply information as requested by the 3 safeguarding partners
- Understand the local criteria for action and protocol for assessment, and ensure these are reflected in your school or trust's own policies and procedures

Your school should continue to work in partnership with your local safeguarding children board (LSCB) and follow any relevant local arrangements until the new safeguarding partner arrangements are in place.  
Information sharing

Governing boards, proprietors and staff need to be aware of their obligations under the GDPR and the Data Protection Act (DPA) 2018.

Your governing board should ensure relevant staff:

- Have due regard to the data protection principles, which allow them to share personal information
- Are confident of the processing conditions which allow them to store and share information for safeguarding purposes
- Are aware that, if they need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information

### **Statutory assessments**

Under the Children Act 1989, LAs can undertake assessments of the needs of individual children to determine what services to provide and what action to take.

You can find information about the assessments on pages 10-11.

- **Section 17 assessment** is for children in need
- **Section 47 assessment** is for where there is reasonable cause to suspect that a child is suffering, or is likely to suffer, significant harm

### **Staff training**

All staff members must undergo safeguarding training (including online safety) at induction and this training should be updated regularly. Training should be in line with advice from the local 3 safeguarding partners.

Staff should also receive regular updates on safeguarding as required, but at least once a year, via for example email and staff meetings.

The DSL and any deputy DSLs should undertake training on their role that is updated at least every 2 years, and should also undertake training on their duties under the government's anti-radicalisation strategy, Prevent.

The DSL and deputies should also have their knowledge and skills refreshed regularly, but at least once a year, via for example e-bulletins, meeting other DSLs or spending time reading and digesting safeguarding developments.

### **Online safety**

You must put appropriate internet filters and monitoring systems in place, to protect students from harmful and inappropriate content online.

The appropriateness of any filters and monitoring systems should be determined by individual schools and will be informed in part, by the risk assessment you need to carry out to comply with [The Prevent duty](#).

When considering the measures you have in place, you should take into account:

- The age range of students
- The number of students
- How often they access the school's IT systems
- The proportionality of costs vs risks

Avoid "over blocking" content so that it doesn't lead to unreasonable restrictions as to what students can be taught about online safety and safeguarding (annex C).

Have a clear policy on the use of mobile phones

Since many students have access to the internet through their mobile phones, you should carefully consider how you manage this access on your premises.

Teach online safety through the curriculum

You should ensure that children are taught about online safety, as a part of safeguarding, through your curriculum.

This could include covering relevant issues through relationships education (in primary schools), relationships and sex education (in secondary schools) and/or PSHE education

Staff safeguarding training should cover online safety

All staff should have regularly updated safeguarding training that includes online safety from the point of induction. Ensure that training is in line with advice from your local 3 safeguarding partners, and enable staff to receive regular updates as required

The designated safeguarding lead (DSL) will take lead responsibility for online safety as a part of safeguarding. Their knowledge and skills should be refreshed at regular intervals so that they're able to understand the unique risks associated with online safety and are able to keep children safe whilst they're online at school

Take action to prevent and tackle cyber-bullying

Your school should take measures to prevent and tackle bullying among students, as well as bullying of staff. These measures should cover all forms of bullying including cyber-bullying.

Make sure you:

- Have whole-school policies and practices designed to combat bullying that are developed by and for the whole community
- Develop clear guidance to help protect all members of the school community and to ensure that sanctions are appropriate and consistent

- Let the school community know how to report incidents and who is responsible for dealing with them

This is outlined in [non-statutory guidance from the DfE on cyber-bullying](#).

### Ofsted expectations

When judging whether your school has effective safeguarding arrangements, Ofsted explains it will expect you to have "well-developed strategies" to keep students safe when using technology, including the internet. It also says that Ofsted will expect staff, leaders and managers to understand the risks posed by adults or young people who use the internet to bully, groom or abuse students.

Inspectors will consider students' understanding of how to keep themselves safe from risks when using the internet and social media, and will include online safety in their discussions with their students. They'll also investigate what you do to educate students in online safety, and how you deal with issues when they arise. This is outlined in Ofsted's [guidance on inspecting safeguarding](#).

### Teaching students about safeguarding

Students need to be taught about safeguarding, including staying safe online, as part of a broad and balanced curriculum. This information could be provided through, for example, personal, social, health and economic (PSHE) education or relationships and sex education (RSE).

### Safer recruitment

Governing boards and proprietors should prevent people who pose a risk of harm from working with children by:

- Adhering to statutory responsibilities to check staff who work with children
- Taking proportionate decisions on whether to ask for any checks beyond what is required
- Ensuring volunteers are appropriately supervised

Maintained schools must ensure that at least one of the people conducting an interview has completed safer recruitment training.

### Allegations of abuse against members of staff

Allegations against staff should be referred to the designated officer(s) at the LA.

### Making referrals to the DBS

You have a legal duty to make a referral to the DBS where:

- An individual has harmed, or poses a risk of harm, to a child or vulnerable adult;
- The harm test is satisfied in respect of that individual;
- 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 then consider whether to bar the person. You should make a referral as soon as possible and ordinarily on conclusion of an investigation, when an individual is removed from working in regulated activity

### Peer-on-peer abuse

Your child protection policy should cover peer-on-peer abuse. It should include information on:

- Procedures to minimise the risk of peer-on-peer abuse
- Recording, investigating and dealing with allegations of such abuse
- The different forms peer abuse can take, such as sexting and physical abuse
- Processes for supporting the victims and perpetrators of peer abuse, and any other children affected by it

- The gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators), but explaining that all peer-on-peer abuse is unacceptable and will be taken seriously

It should make clear that peer abuse will never be tolerated or passed off as 'banter', 'just having a laugh' or 'part of growing up'.

The child's wishes

When determining what action to take in response to a safeguarding concern, you should ensure the student's wishes and feelings are taken into account.

Students should have the opportunity to make their views heard and any systems and processes should have the student's best interests at their heart.

Looked after and previously looked after children

- Staff should have the skills, knowledge and understanding needed to keep looked after children (LAC) and previously LAC safe, including regarding the legal status and parental responsibility arrangements for LAC
- Governing boards must appoint a designated teacher to promote the educational achievement of LAC (and previously LAC), and should ensure this person is appropriately trained
- The DSL should have details of the child's social worker and the name of the virtual school head in the authority that looks after the child, and should work closely with the designated teacher
- The designated teacher for LAC should work with the virtual school head at the LA to discuss how best to use funding to support the progress of LAC. They should also work with the virtual school head to promote the educational achievement of previously LAC

Care leavers

LAs appoint personal advisers for young people who cease to be looked after and become care leavers.

DSLs should:

- Have details of the personal adviser appointed to support a care leaver
- Liaise with the personal adviser as necessary regarding any issues of concern affecting the care leaver

Children with special educational needs

Your child protection policy should reflect the fact that there can be additional barriers to recognising abuse and neglect in children with special educational needs.

The use of 'reasonable force'

There are some circumstances when it's appropriate for staff to use reasonable force to safeguard children.

The decision on whether or not to use reasonable force to control or restrain a child:

- Is down to the professional judgement of the staff concerned
- Should always depend on individual circumstances

When using reasonable force in response to risks presented by incidents involving children with SEN, disabilities or medical conditions, you should, in considering the risks:

- Carefully recognise the additional vulnerability of these groups
- Consider your duties under the Equality Act 2010

### **Part 3: safer recruitment**

Part 3 of the document covers safer recruitment procedures.

Teacher prohibition orders and section 128 directions

- Teacher prohibition orders prevent a person from teaching in schools and colleges
- Section 128 directions prohibit or restrict a person from taking part in the management of an independent school, including academies and free schools. This would include staff management positions, academy trustees and local governors in academies that have been given management responsibilities

- Section 128 directions also disqualify a person from holding or continuing to hold office as a governor of a maintained school
- Where the person will be engaging in regulated activity, a DBS barred list check will also identify any section 128 direction (provided that 'children's workforce independent schools' is specified in the parameters for the barred list check)

#### Pre-appointment checks

The majority of school staff will require an [enhanced DBS check with barred list information](#), as they will be engaging in [regulated activity](#).

Other [pre-appointment checks for new school staff and governors](#) include:

- Verifying identity
- Verifying the right to work in the UK
- Verifying professional qualifications, as appropriate
- Checking that anyone employed to carry out teaching work is not subject to a teacher prohibition order
- Section 128 checks

#### Single central record

You must keep a [single central record](#) (SCR) to demonstrate you've carried out the mandatory pre-appointment checks referred to above.

The SCR must cover:

- All staff (including supply staff and trainee teachers on salaried routes) who work at the school or college; and
- For independent schools, including academies and free schools, all members of the proprietor body (members and trustees in the case of academies and free schools)

For each check on each member of staff, you must record whether it has been carried out and the date on which it was carried out (or the certificate received).

There's no statutory duty to include details of any other checks on the SCR, but you're free to record any other information you deem relevant. This might include checks for childcare disqualification, volunteers, and safeguarding and safer recruitment training dates.

The SCR can be in paper or electronic format.

MATs should ensure the information on the SCR for their trust is recorded in such a way that information for individual academies can be provided separately and without delay to those entitled to inspect it.

### **Part 4 of the guidance covers handling allegations against staff.**

You should use this part of the guidance for cases in which it's alleged that a member of staff or volunteer 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; or
- Behaved towards a child or children in a way that indicates they would pose a risk of harm to children

#### **Initial considerations when investigating an allegation**

The headteacher, or chair of governors if the allegation is against the headteacher, should discuss the allegation with the designated officer at the LA immediately. The headteacher/chair ('case manager') and designated officer can then decide on a course of action.

One of the following terms should always be used when determining the outcome of an investigation of an allegation:

- Substantiated
- Malicious
- False

- Unsubstantiated
- Unfounded

The case manager should inform the person accused about the allegation as soon as possible after consulting the designated officer, unless a strategy discussion is needed or other agencies need to be involved, in which case the case manager should wait until these parties have been consulted before informing the accused. This also applies to informing parents or carers of children involved.

The school should think carefully about whether to suspend the person accused or whether alternative arrangements can be put in place until the investigation is resolved. All options to avoid suspension should be considered prior to taking that step. Suspension should be considered only in a case where:

- There is cause to suspect a child or other children at the school or college is/are at risk of harm, or
- The case is so serious that it might be grounds for dismissal

### **Supporting those involved**

Schools have a duty of care to employees and should support the accused to manage and minimise the stress resulting from the allegation. The accused should be advised to contact their union representative or a colleague for support, and be given access to welfare counselling or medical advice where available.

It's important that the school:

- Maintains confidentiality about the investigation
- Where the accused is a teacher, adheres to reporting restrictions that prohibit the publication of any material that may lead to the identification of the accused, unless:
  - They are charged with an offence,
  - They have waived their right to anonymity, or
  - Information or a decision on the case is published by the secretary of state

### **Managing the situation**

#### **We need to consider:**

- Resignations and 'settlement/compromise agreements'
- Record keeping
- References
- Timescales
- Oversight and monitoring
- Suspension
- Information sharing

If the accused resigns, this should not prevent the allegation being followed up. You must refer the accused to the DBS if the criteria are met.

### **Part 5: Child-on-child sexual violence and sexual harassment**

This section is new for 2018. It covers:

- Responding to reports of sexual violence and sexual harassment
- The immediate response to a report
- Risk assessment
- Action following a report of sexual violence and/or sexual harassment
- Options to manage the report
- Ongoing response

#### **DFE Information:**

##### **Part 1: Defining sexual violence and sexual harassment between children**

The main messages from part 1 of the advice are:

- Sexual violence and sexual harassment can occur between 2 children of any age and any sex or through a group of children sexually assaulting or sexually harassing a single child or group of children
- Sexual violence and sexual harassment:
  - Exist on a continuum and may overlap
  - Can occur online and offline (both physical and verbal)
  - Are never acceptable
- It's important that **all** victims are taken seriously and offered appropriate support
- It's more likely that girls will be the victims of sexual violence and more likely that sexual harassment will be perpetrated by boys. Children who are lesbian, gay, bisexual or trans (LGBT), or perceived to be so, may also be particularly targeted by their peers
- You should make clear that it's not "part of growing up", "banter", "just having a laugh" or "boys being boys" and should not dismiss or tolerate this behaviour
- A whole school preventative approach is important, as many incidents can be driven by wider societal factors, such as sexist language and stereotypes
- Children with special educational needs (SEN) and disabilities are more vulnerable to sexual violence and harassment and additional barriers can exist when recognising abuse in these children

The advice defines rape, assault by penetration, sexual assault, consent and sexual harassment. It also links to further guidance from the NSPCC and Brook on considering whether behaviour constitutes harmful sexual behaviour.

### Part 2: Schools' legal responsibilities

This section of the advice looks at your duties to:

- Safeguard children
- Have measures in place to prevent all forms of bullying
- Follow the statutory guidance on sex and relationships education (SRE) if you teach it
- Act in line with the Human Rights Act 1998 and the European Convention on Human Rights
- Comply with the Equality Act 2010

### Part 3: A whole school approach to prevention

The best schools take a whole school approach to safeguarding and child protection. The school's safeguarding procedures with regard to sexual violence and sexual harassment should be:

- Transparent
- Clear
- Easy to understand for staff, pupils, parents and carers

The advice also covers:

- Contextual safeguarding (i.e. that assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare)
- Safeguarding training
- The role of education in prevention
- Using a planned curriculum as part of a whole school approach
- Specialist support and interventions

It also has a case study on preventative education from a secondary school.

### Part 4: Responding to reports

Reports of sexual violence and sexual harassment are "likely to be complex and require difficult professional decisions to be made, often quickly and under pressure."

It's not possible to provide detailed advice on what to do in any or every particular case and the school should make any decisions on a case-by-case basis, supported by children's social care and the police as required.

However, the following situations are statutorily clear:

- A child under the age of 13 can never consent to any sexual activity
- The age of consent is 16
- Sexual intercourse without consent is rape
- Rape, assault by penetration and sexual assault are defined in law
- Creating and sharing sexual photos and videos of under-18s is illegal (often referred to as sexting). This includes children making and sharing sexual images and videos of themselves

The basic safeguarding principle is:

If a child has been harmed, is in immediate danger, or is at risk of harm a referral should be made to children's social care. A social worker should respond to the referrer within one working day to explain what action they will be taking.

Any rape, assault by penetration, or sexual assault should be reported to the police, as these are crimes. The DSL should lead the school's response and be aware of the local process for referrals to children's social care and making reports to the police.

The advice also looks at:

- How to manage a disclosure (including the immediate response, confidentiality and anonymity)
- Action to take following a report of sexual violence and/or harassment
- A case study of a report of sexual harassment from a 12 year old girl
- The criminal process
- How to safeguard and support the victim
- How to safeguard and support the alleged perpetrator (including any disciplinary response)
- How to safeguard and support the other children