



# Russell Street School

Reviewed on:	September 2023
Reviewed:	Annually
Staff Responsibility:	Headteacher/ DSL/DSLs & SENDCOs

## Child Protection Policy



Russell Street School children are **STARS** - Safe, Together, Achieve, Resilient, Special.

### SAFE

'We all have the right to feel safe all the time.  
Nothing is so awful or so small that we cannot talk about it.'  
(RSS iSafe Programme).

### TOGETHER

Highly supportive relationships are established based on mutual respect.  
Children make a positive contribution to society.  
They understand their rights and responsibilities as citizens and respect the beliefs and values of others.

### ACHIEVE

Children achieve the best possible outcomes through the delivery of an exciting, ambitious curriculum built around progressive new skills and knowledge acquisition.  
Children have a strong desire to learn more and acquire the knowledge and cultural capital they need to succeed in life.

### RESILIENT

Children demonstrate high levels of self-determination and control.  
Through a growth mindset attitude, children believe the impossible is possible.

### SPECIAL

Children have access to a wide, rich set of experiences and have frequent opportunities to develop their talents and interests.  
Children feel an important sense of worth and belonging ensuring good mental health and well-being.

### Russell Street School Safeguarding Team

Designated Safeguarding Lead: Dawn Robinson

Deputy DSL/DSLs:

Jayne Van Rooyen

Lydia Read

Sonia Camp

David Thompson

Shelley Jeffery

Governor: Gillian Lucas (Safeguarding)

Local Authority Designated Officers (LADO): Debbie Young & Kay Newman – 01908 254307

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RSS Safeguarding responsibilities signing agreement 2023/2024

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**Important contacts**

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Head Teacher	Dawn Robinson	Contact 01908 563148
Online Safety Lead	Jayne Van Rooyen	Contact 01908 563148
Designated Prevent Lead	Jayne Van Rooyen	Contact 01908 563148
Designated Child Exploitations Lead	Lydia Read	Contact 01908 563148
Data Protection (GDPR) Officer	Ali Starr	Contact 01908 563148
Designated Safeguarding Lead (DSL/	Dawn Robinson	Contact 01908 563148
Deputy DSL/DDSLs(s)	Jayne Van Rooney Lydia Read (Social Worker) Sonia Camp David Thompson	Contact 01908 563148
Local Authority Designated Officer (LADO)	Debbie Young Kay Newman	<a href="mailto:Lado@Milton-keynes.gov.uk">Lado@Milton-keynes.gov.uk</a> 01908 254306
Safeguarding Governor	Gillian Lucas	Contact 01908 563148
Chair of Governors	Naomi Sumpter	Contact 01908 563148
Designated Governor for Safer Recruitment:	Gillian Lucas	Contact 01908 563148
Mental Health Lead	Alice Cottam	Contact 01908 563148
Designated CLA (Child Looked After) Lead, incl Previously Looked After	Jayne Van Rooyen	Contact 01908 563148

## 1. Introduction

- At Russell Street School, the governors and staff fully recognise the contribution schools make to safeguard children. We recognise that the safety and protection of all pupils is of paramount importance and that all staff, including volunteers, have a full and active part to play in providing early help to protecting pupils from harm.
- Ultimately, effective safeguarding of children can only be achieved by putting children at the centre of the system, and by every individual and agency playing their full part, working together to meet the needs of our most vulnerable children, in line with Working Together 2018 and Keeping Children Safe in Education 2023. The elements of this policy are prevention and protection and support.
- We place a great importance on teaching children how to keep themselves safe. Some examples of this are:

## iSafe

All children are taught the iSafe programme during the first half term of every academic year.



## Colour Monsters

All classes to use the Colour Monster books and materials to teach children emotional literacy vocabulary so that children can name emotions, talk about emotions, recognise emotions in others, learn strategies to regulate their emotions. By using these materials all children have a fully understood way of sharing their emotions and will develop a large set of emotional vocabulary to enable them to do this successfully.



## Jigsaw

Jigsaw is a planned programme of learning we teach throughout the school through which children acquire the knowledge, understanding and skills they need to successfully manage their lives – now and in the future. They develop the qualities and attributes pupils need to thrive as individuals, family members and members of society.

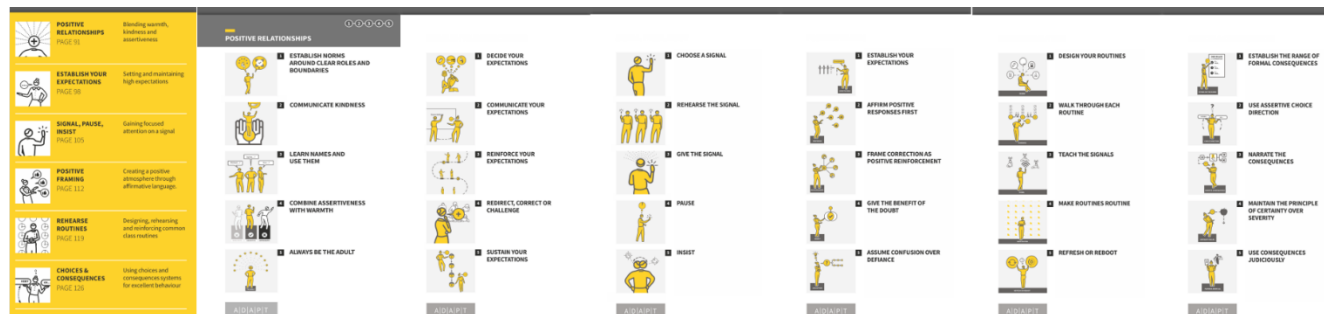


Age Group	Being Me in My World	Celebrating Difference	Dreams and Goals	Healthy Me	Relationships	Changing Me
<b>Ages 3-5 (F1-F2)</b>	Self-identity Understanding feelings Being in a classroom Being gentle Rights and responsibilities	Identifying talents Being special Families Where we live Making friends Standing up for yourself	Challenges Perseverance Goal-setting Overcoming obstacles Seeking help Jobs Achieving goals	Exercising bodies Physical activity Healthy food Sleep Keeping clean Safety	Family life Friendships Breaking friendships Falling out Dealing with bullying Being a good friend	Bodies Respecting my body Growing up Growth and change Fun and fears Celebrations
<b>Ages 5-6</b>	Feeling special and safe Being part of a class Rights and responsibilities Rewards and feeling proud Consequences Owning the Learning Charter	Similarities and differences Understanding bullying and knowing how to deal with it Making new friends Celebrating the differences in everyone	Setting goals Identifying successes and achievements Learning styles Working well and celebrating achievement with a partner Tackling new challenges Identifying and overcoming obstacles Feelings of success	Keeping myself healthy Healthier lifestyle choices Keeping clean Being safe Medicine safety/safety with household items Road safety Linking health and happiness	Belonging to a family Making friends/being a good friend Physical contact preferences People who help us Qualities as a friend and person Self-acknowledgement Being a good friend to myself Celebrating special relationships	Life cycles – animal and human Changes in me Changes since being a baby Differences between female and male bodies (correct terminology) Linking growing and learning Coping with change Transition
<b>Ages 6-7</b>	Hopes and fears for the year Rights and responsibilities Rewards and consequences Safe and fair learning environment Valuing contributions Choices Recognising feelings	Assumptions and stereotypes about gender Understanding bullying Standing up for self and others Making new friends Gender diversity Celebrating difference and remaining friends	Achieving realistic goals Perseverance Learning strengths Learning with others Group co-operation Contributing to and sharing success	Motivation Healthier choices Relaxation Healthy eating and nutrition Healthier snacks and sharing food	Different types of family Physical contact boundaries Friendship and conflict Secrets Trust and appreciation Expressing appreciation for special relationships	Life cycles in nature Growing from young to old Increasing independence Differences in female and male bodies (correct terminology) Assertiveness Preparing for transition

## A safe environment where children can thrive

We know that it is essential that all staff create an environment in which all pupils feel they belong and feel safe; an environment that allows all pupils to thrive as individuals and as learners. We do this by establishing appropriate learning-focused relationships where expectations are set high and where everyone know the routines and the boundaries.

We use the following WALKThrus (see below) to provide quality professional development for all staff ensuring everyone provides a consistent, calm, safe environment ensuring all children feel confident because of the positive relationships formed, to ask for help when needed.



## RSS Stars

All staff use the RSS Stars chart below across the year to ensure iSafe, character development, emotional literacy, forest school, a wide rich set of experiences, good mental health & wellbeing and the development of talents and interests are embedded. This is achieved through daily teaching, experiences, rewards and assemblies.



## Early Intervention

We employ a social worker (Lydia Read) to provide early intervention for families. Through early intervention we can identify and provide effective early support to children and families who are at risk of poor outcomes.

Effective early intervention works to prevent problems occurring, or to tackle them head-on when they do, before problems get worse. It also helps to foster a whole set of personal strengths and skills that prepare a child for adult life.

Early intervention can take different forms, from home visiting programmes to support vulnerable parents, to school-based programmes to improve children's social and emotional skills, to mentoring schemes for children.



## 2. Aims

This policy will contribute to the protection and safeguarding of our pupils and promote their welfare by:

- Clarifying standards of behaviour for staff and pupils;
- Contributing to the establishment of a safe, resilient and robust ethos in the school, built on mutual respect and shared values;
- Introducing appropriate work within the curriculum;
- Encouraging pupils and parents to participate;
- Alerting staff to the signs and indicators that all may not be well;
- Developing staff awareness of the causes of abuse;
- Developing staff awareness of the risks and vulnerabilities their pupils face;
- Addressing concerns at the earliest possible stage;
- Reducing the potential risks pupils face of being exposed to multiple harms including violence, extremism, exploitation, discrimination or victimisation;
- Recognising risk and supporting online safety for pupils, including in the home.

### THE LOCAL CONTEXT

MK Together is the Safeguarding Partnership in Milton Keynes.

The current priorities are:

Mental health  
Child Poverty  
Domestic abuse  
Violence crime  
Hate crime

Russell Street School plays an active role in multi-agency approaches including networking meetings and sharing collaborative working with the school nurse and local policing team.

## 3. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2023\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
  - Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent Duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights \(ECHR\)](#)

- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher will carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows Russell Street School to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils.
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination
- [Marriage and Civil Partnership \(Minimum age\) Act 2022](#), It will not be possible for anyone under 18 to marry or enter a civil partnership
- [DfE \(2022\) Working Together to improve school attendance](#), explains additional measures for children absent from Education
- [DfE \(2023\) Meeting digital and technology standards in school and colleges](#), supporting schools to safeguard pupils
- For schools with pupils aged under 8:
  - [The Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children
- For early years:
  - This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#)

#### 4. Definitions

**Safeguarding and promoting the welfare of children means:**

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

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

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

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

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

**Victim** is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

**Alleged perpetrator(s) and perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

## 5. Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 11)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 13)
- Are missing from education
- Whose parent/carers has expressed an intention to remove them from school to be home educated
- Are LGBTQ+

## 6. Roles and responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Staff will undertake training including online safety training, which will include understanding and expectations relating to filtering and monitoring. Our policy and procedures also apply to extended school and off-site activities.

### 6.1 All staff

All staff will:

- Be expected to read and understand Part 1 of Keeping Children Safe In Education (KCSIE) and annex A and B regardless of their role. [Keeping children safe in education - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/67260/Keeping_Children_Safe_in_Education.pdf)
- Undertake annual training to ensure KCSIE is fully understood as well as this Child Protection Policy.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection policy, the staff behaviour policy/code of conduct. The role and identity of the designated safeguarding lead (DSL/DDSLs). The behaviour policy, the online safety policy and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL/DDSLs, and sharing information with other professionals to support early identification and assessment



- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

Section 17 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## 6.2 The designated safeguarding lead (DSL/DDSLS)

The DSL/DDSLS are members of the senior leadership team. We take lead responsibility for child protection and wider safeguarding across the school.

During term time, the DSL/DDSLS will be available during school hours for staff to discuss any safeguarding concerns.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour
- Take lead responsibility for understanding the filtering and monitoring systems and processes in place

The DSL/DDSLS will also:

- Keep the senior leadership team informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.
- Produce an annual safeguarding audit and reporting to governors
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

The full responsibilities of the DSL/DDSLS are set out in their job description.



### 6.3 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
  - Are informed of all systems which support safeguarding, including this policy, as part of their induction
  - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DDSL/DDSLSs have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL/DDSLS is absent
- Appraisal of the DDSL/DDSLS
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Ensuring there is an annual safeguarding schedule for the safeguarding governor, and half termly reports
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the appointment of a suitably trained Designated Teacher for Looked After Children and a Senior Mental Health Lead. Both of these posts should be a member of the Senior Leadership Team or supported by a member of the Senior Leadership Team.
- Ensuring all listed policies in Appendix 4 are updated to reflect current legislation and guidance
- Ensuring they themselves audit the SCR termly to ensure compliance in relation to safeguarding requirements
- Ensuring the website in relation to safeguarding is compliant
- Making sure each child in the Early Years Foundation Stage is assigned a key person
- Making decisions regarding all low-level concerns, in collaboration with the DDSL/DDSLSs on this

### 7. Confidentiality

Russell Street School has procedures to ensure confidentiality and data protection with respect to safeguarding. These can be found in Data Protection Policy, Privacy notice for parents and carers – use of your child's personal data. We have processes and principles for sharing information within the school and with the 3 safeguarding partners and other agencies as required.

We note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff 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 without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL/DDSLS will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL/DDSLS should consider that:
    - Parents or carers should normally be informed (unless this would put the victim at greater risk)

- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.

If staff are in any doubt about sharing information, they should speak to the DSL/DDSLS.

Confidentiality is also addressed in this policy with respect to record-keeping in section 16, and allegations of abuse against staff in appendix 3.

## 8. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

### 8.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

Tell the DSL/DDSLS (see section 6.2) as soon as possible if you make a referral directly.

Our schools will set out their local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners.

Russell Street's flowchart can be found at the end of this policy

### 8.2 If a child makes a disclosure

If a child discloses a safeguarding issue you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Pass this information on to the DSL/DDSLS. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 8.1) and tell the DSL/DDSLS as soon as possible that you have done so. Aside from

these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process so by a relevant authority involved in the safeguarding process

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a ‘professional curiosity’ and speaking to the DSL/DDSLs if you have concerns about a child.

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

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

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

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

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth
- Personally report any cases to the police where it appears that an act of FGM has been carried out, also referred to as ‘known’ cases. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL/DDSLs and involve children’s social care as appropriate.

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

The duty for teachers mentioned above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.

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

Our school will follow local procedures detailed here:

DSL/DDSLs will contact the MASH on 01908 253169 during office hours Monday to Thursday, 9.00am to 5pm on Fridays 9am to 4.30pm or out of hours on 01908 265545. Northamptonshire MASH on 0300 126 7000.

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

Where possible, speak to the DSL/DDSLs first to agree a course of action.

If in exceptional circumstances the DSL/DDSLs is not available, this should not delay appropriate action being taken.

Speak to a member of the senior leadership team and/or take advice from local authority children’s social care. You can

also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL/DDSLS as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL/DDSLS as soon as possible.

### **Early help/family partnership**

If early help is appropriate, the DSL/DDSLS will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

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

We will use the Level of need document when to assess if a family requires Early Help.

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL/DDSLS will make the referral or support any member of staff to do so.

If any member of staff makes a referral directly (see section 8.1), you must tell the DSL/DDSLS as soon as possible.

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

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

## **8.5 If you have concerns about extremism**

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

If in exceptional circumstances the DSL/DDSLS is not available, this should not delay appropriate action being taken. Seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL/DDSLS or deputy as soon as practically possible after the referral.

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

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

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

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

## 8.6 If you have a mental health concern

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.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8.4.

If you have a mental health concern that is not also a safeguarding concern, speak to the Senior Mental Health Lead to agree a course of action.

## 8.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the chair of governors and local authority designated officer (LADO).

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

## 8.6 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

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

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

See appendix 4 for more information about child-on-child abuse.

### Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and tell the DSL/DDSLs, but do not investigate it
- The DSL/DDSLs will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- The DSL/DDSLS will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
- The DSL/DDSLS will contact the children and adolescent mental health services (CAMHS), if appropriate
- If the incident is a criminal offence and there are delays in the criminal process, the DSL/DDSLS will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.
- The DSL/DDSLS have been undertaken training in Managing sexualised behaviour with the NSPCC. They will use the continuum of behaviours tool to assist them, should any incidents happen. Contact would also be made with MASH team if it is deemed to be appropriate.

#### Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 8.10)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
  - Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
  - Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it will happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - Children can show signs or act in ways they hope adults will notice and react to
    - A friend may make a report
    - A member of staff may overhear a conversation
    - A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL/DDSLS if they have any concerns

The DSL/DDSLS will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **8.9 Sharing of nudes and semi-nudes ('sexting')**

Contact WILL be made with MASH team where appropriate.

If a member of staff is made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL/DDSLS immediately.

The member of staff must not:

- View, copy, print, share, store or save the imagery themselves, or ask a pupil to share or download it (if they have already viewed the imagery by accident, they must report this to the DSL/DDSLS)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL/DDSLS's responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

We will always explain that we need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL/DDSLS.

#### Initial review meeting

Following a report of an incident, the DSL/DDSLS will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and other DDSLS. This meeting will consider the initial evidence and aim to determine:

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

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



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

If none of the above apply then the DSL/DDSLS, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

#### Further review by the DSL/DDSLS

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL/DDSLS will conduct a further review to establish the facts and assess the risks. They will hold interviews with the pupils involved (if appropriate).

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

#### **Informing parents/carers**

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

#### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the police, dialling (101).

#### **Recording incidents**

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 16 of this policy also apply to recording these incidents.

#### **Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of Jigsaw.

#### **8.10 Reporting systems for our pupils**

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

We have systems for (all taught through iSafe)

- Reporting systems for pupils, e.g. what it looks like for pupils in terms of who they should report concerns to
- Making pupils aware of the reporting systems and processes,
- Ensuring pupils feel safe in submitting any concerns, e.g. reassurances provided following disclosures

## 9. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this we:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Ensure appropriate filtering systems are in place on devices and networks. However, we will ensure the filtering system does not cause “over blocking” which may lead to unreasonable restrictions to what pupils can be taught online

Our approach to online safety is based on addressing the following 4 categories of risk:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as 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, such as 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; and

**Commerce** – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

Children at RSS are not be allowed to bring mobile phones in school

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Staff will be aware of the filtering and monitoring system, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents’ evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras

- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

## 10. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

The DSL/DDSLS will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 11. Pupils with special educational needs, disabilities or health issues

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

Our school will offer extra pastoral support for these pupils. This includes:

Pupils with SEN, disabilities or certain health conditions will be supported through various ways. Including access to our onsite SEN provision, providing PCS / sign language.

Any abuse involving pupils with SEND will require close liaison with the DSL/DDSLS and the SENDCO.

## 12. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL/DDSLS and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL/DDSLS will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes.

For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral

### **13. Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL/DDSLS has details of children's social workers and relevant virtual school heads

The designated teacher LAC who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL/DDSLS to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans
- Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
- They should also identify and engage with key professionals, e.g. DSL/DDSLSs, SENDCOs, social workers, mental health leads and others.

### **14. Pupils with mental health needs**

We will ensure that staff have the skills, knowledge and understanding to keep children with mental health needs safe. In particular, we will ensure that:

- Appropriate staff have relevant information and training about children's mental health
- There are clear expectations of behaviour, well communicated social norms and routines reinforced by a highly consistent consequence system, which take into account educational, mental health and other needs or vulnerabilities
- There are clear systems and processes in place for identifying possible mental health problems including routes to escalate and refer
- We signpost local services available to support pupils including school nurses, GPs, trained professionals and voluntary organisations

We have appointed a Senior Mental Health Lead who is responsible for promoting the educational achievement of children with mental health needs

The Senior Mental Health Lead is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the Senior Mental Health Lead will:

- implement the 4 stage process, namely: Prevention, identification, early support and access to specialist support (see the guidance referenced in section 8.6)
- Work closely with the DSL/DDSLS and SENDCO to ensure children are supported and safeguarded

## 15. Complaints and concerns about school safeguarding policies

### 15.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### 15.2 Other complaints

Complaints received about Russell Street pupils will be followed up by using the behaviour and safeguarding policy. If a complaint is received about the school site or premises, the Business Manager will respond in line with the Health Safety Policy

Early years will take account of requirements related to complaints set out in the safeguarding and welfare section of the statutory framework for the Early Years Foundation Stage (paragraph 3.75).

### 15.3 Whistle-blowing

Russell Street School has a separate whistle-blowing policy that covers concerns regarding the way the school safeguards pupils – including poor or unsafe practice, or potential failures found on our website.

## 16. Record-keeping

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded on CPOMS.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL/DDSLS will ensure that their child protection file is forwarded promptly and securely (within the 5-day window), and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL/DDSLS will speak to the DSL/DDSLS of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

- Safeguarding referrals are made online using CPOMS
- All safeguarding and child protection related documents and records are online – CPOMS
- All access is via a log in a password
- All staff have access to report concerns
- Only DSL/DDSLS, have elevated access
- Paper documentation is scanned and uploaded to the relevant CPOMS area for the family or child
- Paper documents are then shredded
- Information on CPOMS is held in the CPOMS archive
- Transferring of information is via CPOMS where this allows
- Paper transfer is completed in person where possible or via recorded delivery where it is not
- Data protection policy is followed when sharing information with outside agencies and services
- Letter sent to previous school to collect information.

In addition:

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

## **17. Training**

### **17.1 All staff**

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
  - Manage behaviour effectively to ensure a good and safe environment
  - Have a clear understanding of the needs of all pupils

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

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

Volunteers will receive appropriate training, if applicable.

### **17.2 The DSL/DDSLs**

The DSL/DDSLs will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually through DSL refresher training and reading safeguarding developments.

They will also undertake Prevent awareness training.

### **17.3 Governors**

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

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

### **17.4 Recruitment – interview panels**

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

See appendix 2 of this policy for more information about our safer recruitment procedures.

#### 17.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

#### 18. Monitoring arrangements

This policy will be reviewed annually (Dawn Robinson Head Teacher). At every review, it will be approved by the governing body.

#### 19. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff behaviour/code of conduct
- Complaints
- Health and safety
- Attendance/ children who are absent from education
- Online safety
- Equality
- Relationships and sex education
- First aid
- Teaching, Learning & Curriculum (TLC)
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle-blowing
- IT and acceptable use
- Child on Child abuse

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.



## Appendix 1: Types of abuse

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

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

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

Emotional abuse may involve:

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

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

The activities may involve:

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

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

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

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

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

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

## Appendix 2: Safer Recruitment and DBS checks – policy and procedures

### Recruitment and selection process

The recruitment steps adopted by Russell Street School are those outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training. We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

#### Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

#### Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

#### Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
  - If they have a criminal history
  - Whether they are included on the barred list
  - Whether they are prohibited from teaching
  - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - Any relevant overseas information
  - Sign a declaration confirming the information they have provided is true

We will carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online.

#### Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

## **New staff**

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks.

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
  - For all staff, including teaching positions: [criminal records checks for overseas applicants](#)
  - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason why that person may be unsuitable to teach check that candidates taking up a management position\* are not subject to a prohibition from management (section 128) direction made by the secretary of state

\* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Pupils aged under 8: We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

### **Existing staff**

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- For those who have not had a new enhanced DBS check within the last 5 years of continuous service (this is not dependent on change of role)

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

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

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

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

### **Contractors**

We will ensure that any contractor, who is to work at the school has had the appropriate level of DBS This will be:

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

We will obtain the DBS check for self-employed contractors. We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances. We will check the identity of all contractors and their staff on arrival at the school.

As our pupils are aged under 8: For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

## **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Pupils aged under 8:

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

## **Governors**

All governors will have as a minimum an enhanced DBS check without a barred list check.

If they will be working in regulated activity, they will be required to have an enhanced DBS check with a barred list check.

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Pupils in alternative provision settings

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

### Appendix 3: Allegations of abuse made against staff

#### Section 1: Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

[Lado@Milton-Keynes.gov.uk](mailto:Lado@Milton-Keynes.gov.uk) tel 019082543307

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

If we're in any doubt as to whether a concern meets the harm threshold, we will always consult our local authority designated officer (LADO).

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

#### Suspension of the accused until the case is resolved

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

**Substantiated:** there is sufficient evidence to prove the allegation

**Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** there is sufficient evidence to disprove the allegation

**Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL/DDSLS and make a risk assessment of the situation. If necessary, the DSL/DDSLS may make a referral to children's social care
- If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing



the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. The School Business Manager/HR Manager will be able to provide support to members of staff. HR will also be able to assist members of staff.
- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

## Early Years

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The Headteacher will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

#### Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

#### Specific actions

##### Action following a criminal investigation or prosecution

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

##### Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

##### Individuals returning to work after suspension

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

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

##### Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL/DDSLS will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

## Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

## Confidentiality and information sharing

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

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

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

## Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold, set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Humiliating pupils
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

## Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 8.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

## Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff behaviour policy/code of conduct. The headteacher will be the ultimate decision maker in respect of all low level concerns though they may wish to collaborate with the DSL/DDSLs

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations, which work with children](#)

## Record keeping

All low-level concerns will be recorded in writing. See appendix 7 This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.

## Appendix 4: Specific Safeguarding issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular annex B

### Children missing from education

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

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

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

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

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

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

### Child criminal exploitation

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

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation

- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL/DDSLS. The DSL/DDSLS will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Further information and reporting concerns can be found in the flow chart found at the end of this policy.

### **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL/DDSLS. The DSL/DDSLS will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Further information and reporting concerns can be found in the Delta Federation flow chart, this can be found at the end of this policy.

### **Domestic abuse**

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.



Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development and ability to learn.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass – if your local force is not, check your local procedures and adapt if necessary.

The DSL/DDSLS will provide support according to the child's needs and update records about their circumstances.

### **Homelessness**

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

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

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

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

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

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

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

### **FGM**

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

Section 8.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues

- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs
- Potential signs that a pupil may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

## Forced marriage

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

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

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

The DSL/DDSLS will:

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

## Preventing radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will follow our procedures set out in section 8.5 of this policy, including discussing their concerns with the DSL/DDSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, further information and reporting concerns can be found in the flow chart found at the end of this policy.

### **Child-on-Child abuse**

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online, and can occur simultaneously between the two.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

When supporting victims, staff will reassure them that the law on child-on-child abuse is there to protect them, not criminalise them

Sexual violence and sexual harassment between children in schools

Our school has a zero-tolerance approach to sexual violence and sexual harassment, and that even if there are no reports, that doesn't mean that this kind of abuse isn't happening

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- re-assure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 8 of this policy, as appropriate. In particular, section 8.8 and 8.9 set out more detail about our school's approach to this type of abuse.

### **Serious violence**

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL/DDSLS.

### **Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

Visitors are expected to sign on to the electronic system. Once this has been done, they will be given a lanyard and visitor's badge.

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

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

#### **Non-collection of children**

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

Pupils are taken to the school office by the class teacher, the TA for the class or other appropriate adult. Staff to inform the DSL/DDSLs of the child's full name and their class. DSL/DDSLs to contact parents/carers. DSL/DDSLs to remain with the child until they are collected.

Report onto CPOMS as appropriate. Report to social work/ MASH as appropriate.

Contact the police if necessary

#### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will:

Contact is made with parents by parent mail.

Other contacts will be contacted if there is no response from parents

Dependent upon any risk assessment, a home visit may be undertaken

We will inform the Local Authority of any pupil who fails to attend or has been absent without the school's permission for a continuous period of 10 school days or more

## Appendix 5

### Low Level Concern Form

This form can be used to share any concern with the Head teacher, no matter how small or seemingly insignificant, even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that is inconsistent with the Schools' Code of Conduct (including inappropriate conduct outside of work) and/or in a way that on first glance does not appear to meet the allegation, 'harm' threshold.

A concise record is required, including brief context in which the low level concern arose, plus details which are chronological, precise and as accurate as possible, of any such concern and /or relevant incident[s]. [Continue on separate sheets as necessary]. The form should be signed, times and dated.

Details of CONCERN:

Name of Staff member:	Department and Role:
Signed :	Time and Date:

Received by:	
At [time]:	Date:



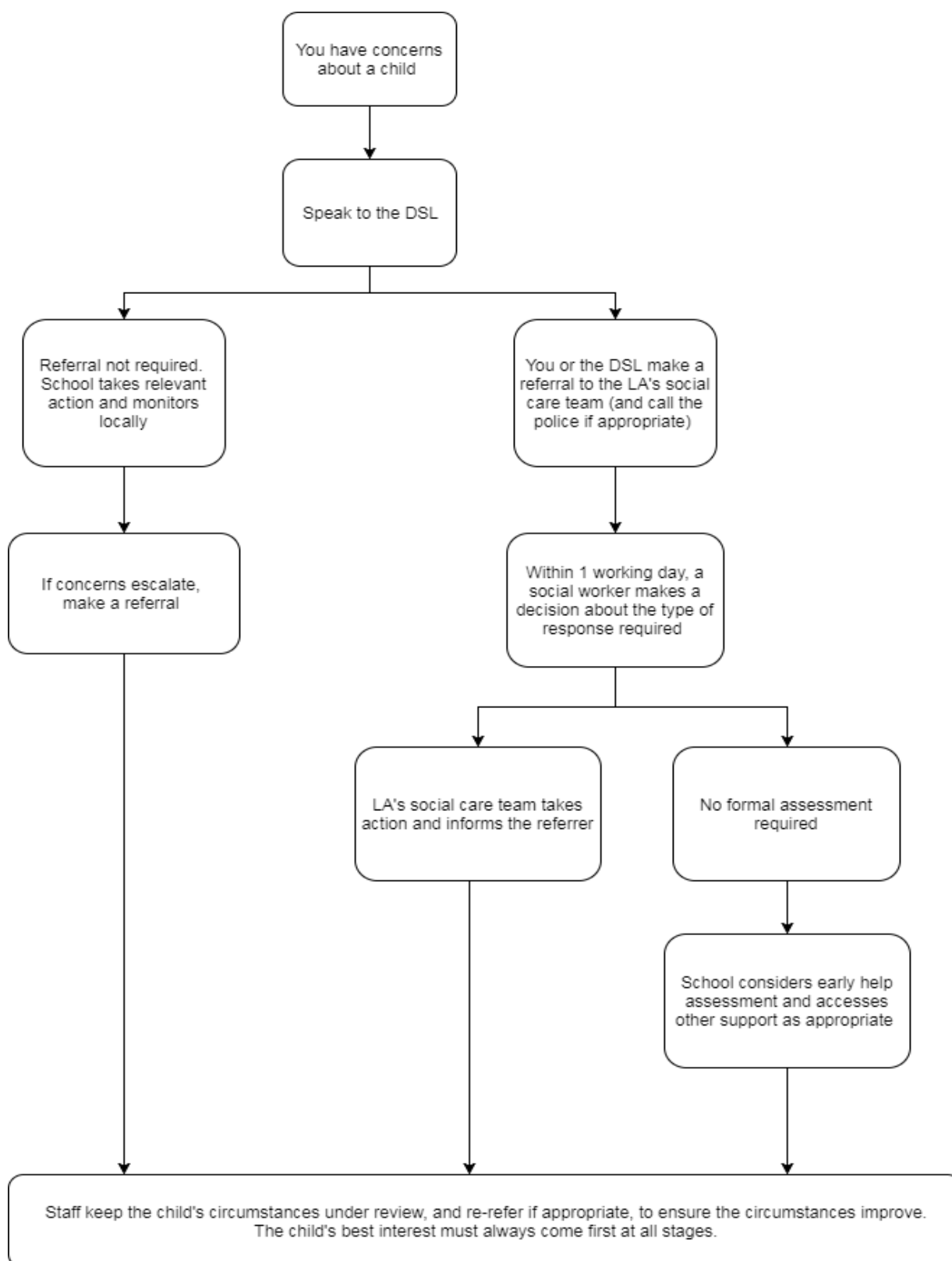
<p>WAS THE STAFF MEMBER SPOKEN TO? [Good practice will require a response].</p> <p>NO <input type="checkbox"/> - Give a brief but valid reason/explanation for not;</p>	
<p>YES <input type="checkbox"/> - Please complete detail below - STAFF MEMBER'S RESPONSE TO CONCERN:</p>  <p>ACTION TAKEN:</p>  <p>Was advice/guidance sought from the LADO and or Human Resources? Yes: <input type="checkbox"/> No: <input type="checkbox"/></p>	
Signed :	Dated :

This record form will be held securely, either digitally or in paper form, in one central file in accordance with the School's Code of Conduct and any associated guidance regarding the management of concerns and or allegations and in accordance with School's Data Management practices/policies.

Low Level Concern reporting will be treated as confidential as far as possible, however in certain circumstances it may be necessary to share and or disclose the information with third parties for relevant and necessary reasons. This includes where a reporter has indicated they wish to remain anonymous.

## Appendix 6

### Reporting Safeguarding concerns flow chart



# RSS Safeguarding Responsibilities Signing Agreement 2023 to 2024

## **PREVENT:**

I have been provided with training on Prevent and understand that if I have any concerns to possible extremism or radicalisation, whether it be a pupil, parent/ carer, member of staff or any member of the community including visitors, I must report this using the Child Protection referral process and to share with one of the Designated Safeguarding Teachers immediately. I understand that I may need to report through jointly with the DSL under the prevent duty

## **POSITIVE HANDLING:**

I understand I must adhere to the permitted actions in line with government guidelines on the restraint of children. The Education Act 1996 forbids corporal punishment but permits staff to use reasonable force to prevent a pupil from:

- Committing a criminal offence
- Injuring themselves or others
- Damaging property
- Acting in a way that is counter to maintaining good order and discipline at the school.

Reasonable means 'Using no more force than is needed.' The department advises a 'no contact' policy at a school can leave staff unable to fully support and protect their pupils and students. When using reasonable force in response to risks presented by incidents involving children with SEND or disabilities or with medical conditions schools should consider the risks carefully and recognise the additional vulnerability of these groups. (KCSIE, 2023)

I understand the use of positive handling is a final option and should never endorsed unless for the safety of the child or others and is a last resort. If there is another member of staff present when positive handling is required (for safety reasons) who has the appropriate training, this member of staff would provide the positive handling and I would support as appropriate in response to this member of staff. For any positively handling conducted, I will always ensure I inform a member of the senior leadership team and complete the positive handling bound book or CPOMS with factual accuracy. These must be seen and signed off by a senior leader.

Each incident will be considered, to ensure that the right action was taken and to consider how similar issues will be dealt with in future.

## **GENERAL DATA PROTECTION REGULATION (GDPR):**

I am aware GDPR came into enforcement on 25th May 2018 and if there are any concerns with regards to data breaches (for example where data is lost, accidentally deleted or stolen), I must inform the Data Protection Officer (Ali Starr) IMMEDIATELY (we only have 72 hours to report data breaches to the Information Commissioner Office – ICO). I understand the importance of keeping personal data of others, including email addresses, secure and it is advisable to avoid use of memory sticks for personal data and downloading personal data onto laptops. If paper copies including any personal data are required, these are to be kept secure during use and shredded as soon as no longer in use. Information on electronic devices including laptops, mobile phones and I pads, will be protected with passwords and when screens are not in use, locked so no one else can gain access to them.

As stated within KCSIE September 2023, I understand that: 'The Data Protection Act 2018' and UK GDPR regulations do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.' When considering whether to share information with colleagues and other organisations, maintaining the safety of the child is always the priority.

## **PUBLIC SECTOR EQUALITY DUTY (2011):**

I understand that I must adhere to the Equality Act 2021 and will not tolerate any discrimination against someone because of any of the protected characteristics (age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex and/ or sexual orientation). I understand that any bullying related to any of the protective characteristics, is a 'non-negotiable' and will not be tolerated with or towards any members of our community - children, staff, governors, trustees, parents/ cares and any visitor. I understand it is every member of the RSS community responsibility to speak out and ensure RSS provides a safe, happy and nurturing environment free from any form of bullying, intimidation or harassment and will share any concerns with the school DSL/DDSLs.

## **HEALTH AND SAFETY:**

I understand everyone has the responsibility to keep everyone safe and if there is any aspect of safety or safeguarding, I am aware of which may make an adult or child unsafe I must report it. This includes safety within the environment and school buildings.

## **FIRE SAFETY:**

I am aware if the fire alarm is heard, I need to ensure that I leave the building immediately, without collecting any belongings, walking calmly to meeting point where I remain until the 'all clear' has been given. I understand I must ensure that I am aware of the fire procedures in place where I am working.

#### **USE OF TECHNOLOGY:**

I understand that I can only take appropriate and purposeful photographs of pupils on school equipment. I am aware I need to check that we have parental;/ carer permission to take their photographs and they must not be stored in 'clouds' nor on memory sticks. I must not take photos using any personal device, including mobile phones. Any photos stored on school devices will be kept in line with our policy, reviewed and destroyed at appropriate times.

#### **USE OF SOCIAL MEDIA, INCLUDING INSTAGRAM, FACEBOOK ETC:**

I understand that under no circumstances will I communicate with a pupil via any form of social media, messaging via emails or texting and the like. I understand I will not share my email address, mobile number, Instagram, Facebook details etc. with any pupil, including when they leave the school.

I understand that I must keep my personal life separate from my professional life to avoid conflict.

Additionally, I am aware and understand that I must not talk about or mention the school within social media, including Facebook, Instagram and other sites, nor comment in any way that might show them in a negative light or bring the school into disrepute. I understand the importance of confidentiality in all areas of school life and that any comments cannot be made about the school under any circumstances. Additionally, I understand that I must take care that any photos or information shared on Facebook, Instagram and other sites are appropriate and will not reflect myself and the school in a negative light. I understand that breach of this can result in disciplinary action.

#### **CHILDCARE DISQUALIFICATION:**

Disqualification under the Childcare Act states that a person who is disqualified under the 2018 regulations may not:

- provide relevant childcare provision (this includes schools)
- be directly concerned in the management of such provision

By signing of this form, I can confirm that I have not been disqualified as stated within the Childcare Act and I can confirm I am appropriate and suitable to work with children. I am aware that I MUST inform the head teacher if there are any disqualifications, issues that affect my suitability to work with children or reasons for concern which arise.

I am aware that my behaviour in and out of work is considered and that low level concerns will be investigated and may be included on my personnel file.

#### **APPROPRIATE AND SUITABLE BEHAVIOUR FOR WORKING WITH CHILDREN:**

I am aware that I must ensure my behaviour towards and with children is appropriate at all times both during and outside of working hours. I understand an allegation of abuse against staff or volunteers can be made if I have:

- behaved towards a child or children in a way that has harmed 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 they may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Inappropriate behaviour includes contacting any pupil via social media, texting, WhatsApp, emailing, phoning etc. and taking photographs on personal devices as stated above.

In addition, I am aware that low level concerns, such as showing favouritism to a child, shouting at a child, engaging in rough play with a child or breaching the code of conduct, must be reported through to the Headteacher (or Chair of Governors) if the concern is about the Headteacher.

Low level concerns do not cause direct harm to a child, but they may indicate behaviour which if left unchallenged may build up to a concern that reaches the Harm criteria for a referral to the LADO.

I am aware that these will be recorded on my personnel file and will be shared with the LADO in the event of a referral being made.

#### **LOCKDOWN PROCEDURES:**

I know the school lockdown procedures and know what I need to do in the event of the school needing to be locked down.

#### **FEMALE GENITAL MUTILATION**

I can confirm that I have been provided with training on FGM and that I am legally responsible to report any concerns about the possibility to the DSL using the referral process immediately.

#### **EVACUATION PROCEDURES**

I know what I need to do in the event of the building needing to be evacuated, for example a gas leak, and will ensure I act calmly and swiftly to ensure myself and the children are evacuated safely.

## Code of conduct for suitability for working with children and young people

At Russell Street School we have professional ethics and a code of conduct that we will all work to. Everyone working or volunteering at Russell Street School needs to follow this code of conduct and ensure they always conduct themselves in an appropriate way.

This code of conduct is principally designed to safeguard children and young people within at Russell Street School but will also help you to identify the required standards of behaviour you need to follow as you carry out your role as a worker or volunteer. Following this code of conduct will reduce the likelihood of any misinterpretations of your actions or behaviour. It is key for you to remember that you have been allocated a position of trust and responsibility and you must act in accordance with this code of conduct at all times.

Please ensure you follow all of the following requirements:

Do treat all old colleagues and children equally with respect and dignity- offensive discriminatory or aggressive behaviour will not be tolerated under any circumstances

Do ensure you understand your role in any policies and procedures and know what you must do to follow them. For example, child protection, behaviour and health and safety. Be clear about what you should and must do if you are concerned about the safety or welfare of a child, young person or an adult

Do cooperate fully with any other professionals, colleagues and volunteers and ensure you always display high standards of behaviour, appearance and conduct

Do show the utmost respect for your peers and colleagues, children and their families and treat everyone how you would want to be treated yourself

Do understand that inappropriate behaviour will be followed up by the designated safeguarding lead and will be recorded. For more serious concerns, the decision made about how to respond to any concerns will be in consultation with the local authority designated officer

Do act as a role model for other young people and children and remember your behaviour may influence others

Do ensure that permission is sought from parents or carers for any photographs or videos of children or young people and that these may only be captured using the settings equipment - do not use your own personal devices

Do remember that your behaviour towards children young people and their families must be appropriate at all times and that you are in a position of trust and this should reflect your role

Sexual relationships with anyone under the age of 18 in your care will be treated as an abuse of trust and dealt with through the disciplinary procedures

Do be vigilant of changes in behaviour and inappropriate conduct in other colleagues and professionals or volunteers and if you have any concerns, you must report them to your designated safeguarding lead or head teacher or Whistleblow if there are concerns about your head teacher

Do remember that you are professional and you must maintain professional boundaries with all children and families that you work with at all times.

There are a number of key things that you must not do or ensure must not happen whilst working or volunteering at Russell Street School. These include:

Never spend time alone with children out of sight of others, including in offices with the doors closed

Never take or drop off a child alone and if you are taking a child home with another member of staff, ensure you are following agreed procedures and have agreed safeguards in place

Never take any child or children to your home with or without any other member of staff

Never engage in rough physical or sexual provocative games

Never allow or engage in any form of inappropriate touching or physical abuse

Do not take part in or tolerate behaviour that frightens, embarrasses or demoralises a child or young person or affects their self esteem

Never make any sexual suggestive comments to a child even in fun

Do not allow any allegations made by a child to go unchallenged, unrecorded or ignored. They must always be reported whether you feel they are accurate or not

Never make a child cry or use physical force as a form of control

Do not do things of a personal nature for any child or vulnerable adult they can do for themselves

If agreed as a school that this is needed, this must always be following the Intimate Care Policy and following their personal care plan

Do not ever contact children or families individually Via Facebook or any media including mobile phones

Do not make any promises you cannot keep and never agree to keep anything a secret which will put the safety of anyone at risk. Disclosures on child protection issues must be referred to the DSL/DDSLS at all times

Avoid favouritism and special friendships; we must remain and keep professional at all times. Remember children are not your friends and professional boundaries must be maintained

Do not take any pictures of any child using personal equipment

This code of conduct helps to protect the children and young people we work with and helps to reduce the risk of anyone working at Russell Street School who are using their role to help them access children to cause them harm. It also helps to identify any practise that could be misinterpreted which may lead to a false allegation being made.

Any breach of the code of conduct may lead to disciplinary action being taken. Serious breaches may result in referral to the police, social services or the Local Authority Designated Officer. Low level concerns will be recorded and kept on your records.

All workers or volunteers are expected to report any breach of conduct to the designated safeguarding lead or head teacher or designated officer.

Please complete the section below to confirm that you agree to follow this code of conduct.

- I understand my role and responsibilities as set out in these document(s):
  - 1. RSS Child Protection and Safeguarding Policy (including Managing Allegations Against Staff)– read and understood
  - 2. Part 1 and Annex Further Information of 'Keeping Children Safe in Education' DfE Guidance, 2023 (key changes were explained within the safeguarding training) – read and understood
  - 3. Behaviour Policy and Statement of Behaviour Principles – read and understood
  - 4. RSS Whistleblowing Policy 22 to 23 – read and understood
  - 5. Code of Conduct– read and understood
  - 6. RSS Safer recruitment policy 22 to 23 – Aware of the Policy and where to find it
  - 7. RSS Data Protection Policy – Read and understood
  - 8. Working Together to Safeguard Children (DfE 2018): Aware of this document and where to find it
  - 9. Equality Statement and school Equality plan including the equality objectives – Read and understood
  - 10. RSS Complaints Policy – aware of the policy and where to find it

- Consent

☐ I know that further guidance, together with copies of the policies mentioned above, are available on the school website and in the policies drive. I am aware that if I cannot locate a policy, I can ask any member of the Senior Leadership Team. I understand that by signing this document I am agreeing to follow these policies, if I believe that any of these policies are not effective, then I will raise this with the headteacher/ member of the SLT. I will not deviate from these policies for any individual child. If I become aware that any staff or volunteer is not following the policies, then I will immediately report this to the Headteacher and/ or SLT. I understand that if I do not understand any information in the Policy or in the above documents, I can see any of the Safeguarding Designated Leads

I understand it is my legal duty of care to speak to one of the DSLs if I have any concerns with regards to Safeguarding or Child Protection. I understand that it is important to share any concerns and if I am unsure if it is child protection or not, I will always discuss to clarify this. I am aware that if it is a Child Protection Issue, I must inform one of the DSL/DDSLS IMMEDIATELY so appropriate actions can be taken as soon as possible, the same day. I know the whistleblowing procedures and if I have raised at with the Head teacher and still have concerns or the concerns relate to the head teacher I will speak to the Chair of Governors

Full Name
Role
Date