Raglan Primary School and Nursery
Part of Connect Schools Academy Trust

Child Protection and Safeguarding Policy

Raglan Primary School and Nursery are committed to safeguarding and promoting the welfare of children and young people and expects all staff and volunteers to share this commitment.

	Date
Date of Review	September 2023
Date of Next Review	September 2024

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SUMMARY OF CHANGES	
Date	**Change**
September 2023	References to Keeping Children safe in Education amended to 2023 throughout
	Amended terminology – 'CAF' known as Early Help Assessment.
Dec 2023	Updated Appendix for Filtering and Monitoring Standard for CSAT and Webscreen Filtering Instructions. Appendix 10 and 11
Jan 2024	Links adjusted and new LADO referral link added to p.2

Key Persons

AGENCY	CP TEAM	ROLE	CONTACT DETAILS
Bromley Children's Safeguarding Partnership	Gemma Taylor	Local Authority Designated Safeguarding Lead (LADO)	020 8461 7669 (via Bromley Safeguarding Children's Board) gemma.taylor@bromley.gov.uk lado2@bromley.gov.uk (general enquiries) lado@bromley.gcsx.gov.uk (secure email) Lado Referral Link: LADO Referral (bromley.gov.uk)
Bromley Children's Safeguarding Partnership	Libby Kember	Senior Education Safeguarding Officer	Libby.kember@bromley.gov.uk 0208 461 7266
Bromley Safeguarding Nursing Team	Alice Hammond	School Nurse Health Advisor (SCPHN)	alice.hammond1@nhs.net 0208315 8715 (option 8) Mobile: 07511414327

Metropolitan Police (South BCU)	Dave Stringer	Chief Superintendent, South BCU (Croydon, Bromley and Sutton Boroughs)	www.met.police.uk dave.stringer@met.police.uk 0207 230 1212
Bromley Integrated Care Board (Prev: Clinical Commissioning Group)	Dr Angela Bhan	Managing Director	0208 176 5330 broccg.contactus@nhs.net www.bromleyccg.nhs.uk
Bromley Council (Children's Services)	Janet Bailey	Director of Children's Services Includes: Children's Social Care and Education	Janet.Bailey@bromley.gov.uk
Bromley Local Authority Bromley Council	Jared Nehra	Director of Education	jared.nehra@bromley.gov.uk 020 8313 4501
Multi-Agency Safeguarding Hub (MASH) (Or Bromley Help, Support and Safeguarding Hub for Children and Families)		MASH Team	020 8461 7373/7379/7026 mash@bromley.gov.uk out of Hours 030 0303 8671
Bromley Safeguarding Partnership Bromley council		Early Help Assessment Team	mash@bromley.gov.uk 020 8461 7174

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Post Adoption Team Education & Social Care Bromley Council	Megan Elwell	Senior Practitioner Adoption Team	megan.elwell@bromley.gov.uk 020 8313 4245 www.bromley.gov.uk
Bromley Virtual School	Sally Kelly	Head of the Virtual School	sally.kelly@bromley.gov.uk
Anti-Radicalisation		PREVENT Team	020 7340 7264 Counter.terrorism@education.gsi.gov.uk
Raglan Primary School	Matt De Freitas	DSL	mdefreitas@raglan.bromley.sch.uk
	Danielle Mead	DDSL	dmead@raglan.bromley.sch.uk
	Martin Hunter	DDSL/Inclusion	mhunter@raglan.bromley.sch.uk
	Emily Ingrey	DDSL	eingrey@raglan.bromley.sch.uk
	Sam Collins	DDSL/Family Liason Officer	scollins@raglan.bromley.sch.uk
	Steph Bridge	After School Club	sbrdige@raglan.bromley.sch.uk
	Cindy Carberrry	Breakfast Club	ccarberry@raglan.bromley.sch.uk
	James Faiers	Chair of Governors	jfaiers@raglan.bromley.sch.uk

Additional Advice and support

Abuse or safeguarding Issue	Link to Guidance/Advice	Source
Abuse	What to do if you're worried a child is being abused https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/419604/What_to_do_if_you_re_worried_a_child_is_being_abused.pdf	DfE Advice

	Domestic Abuse: Various Information/Guidance https://www.gov.uk/guidance/domestic-abuse-how-to-get-help#history	Home Office
	Faith Based Abuse: National Action Plan https://www.gov.uk/government/publications/nationalactionplan-to-tackle-child-abuse-linked-to-faith-or-belief	DfE Advice
	OE Teachers' National helpline https://www.operationencompass.org/ 02045 5139990	DfE Advice
Bullying	Preventing bullying including cyberbullying https://www.gov.uk/government/publications/preventingandtackling-bullying https://www.gov.uk/government/publications/review-of-sexual-abuse-in-schools-and-colleges/review-of-sexual-abuse-in-schools-and-colleges (see linked documents)	DfE Advice
Children and the courts	Advice for 5 – 11 year old witnesses in criminal courts https://www.gov.uk/government/publications/youngwitnessbooklet-for-5-to-11-year-olds	MoJ Advice
Children missing from education, home or care	Children missing education https://www.gov.uk/government/publications/childrenmissingeducation	DfE Statutory Guidance
	Children missing from home or care https://www.gov.uk/government/publications/childrenwhorun-away-or-go-missing-from-home-or-care	DfE Statutory Guidance
	Children and adults missing strategy https://www.gov.uk/government/publications/missingchildrenand-adults-strategy	Home Office Strategy
Children with Family Members in Prison	National Information Centre on Children of Offenders https://www.nicco.org.uk/	Barnardo's in partnership with Her Majesty's Prison and Probation Service advice

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Children with Family members in the court system	CAFCASS Cafcass, 16th Floor, Southern House, Wellesley Grove, Croydon, CR0 1XG Website: www.cafcass.gov.uk Call Centre: 0300 456 4000	Bromley Safeguarding Partnership
Child Exploitation	County Lines: Criminal exploitation of children and vulnerable adults https://www.gov.uk/government/publications/criminalexploitatio n-of-children-and-vulnerable-adults-county-lines	Home Office Guidance
	Child Sexual Exploitation: guide for practitioners https://www.gov.uk/government/publications/childsexualexploi tation-definition-and-guide-for-practitioners	DfE
	Trafficking: Safeguarding Children https://www.gov.uk/government/publications/safeguardingchil dr en-who-may-have-been-trafficked-practice-guidance https://www.gov.uk/government/publications/modern-slavery-how-to-identify-and-support-victims	DfE and HO Guidance

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Drugs	Drugs: Advice for Schools https://www.gov.uk/government/publications/drugs-adviceforschools	DfE and ACPO advice
	Drugs Strategy 2017 https://www.gov.uk/government/publications/drugstrategy-2017	Home Office Strategy
	Information and Advice on Drugs https://www.talktofrank.com/	Talk to Frank Website
	ADEPIS Platform sharing information and resources for schools covering drug (and alcohol) prevention http://mentor-adepis.org/

Bromley Changes (Young people's Drug and Alcohol Services)
 0208 289 1999
 referrals.bromley@cgl.org.uk | Website developed by Mentor UK |
"Honour – Based" Abuse	Female Genital Mutilation: Information and Resources https://www.gov.uk/government/collections/femalegenitalmutilation	Home Office
	Female Genital Mutilation: multi agency statutory guidance https://www.gov.uk/government/publications/multiagencystatutory-guidance-on-female-genital-mutilation	DfE, DH and HO Statutory Guidance
	Forced Marriage: Information and Practice Guidelines https://www.gov.uk/guidance/forced-marriage	FCO and HO
Health and Well-Being	Fabricated or Induced Illness: safeguarding children https://www.gov.uk/government/publications/safeguardingchildr en-in-whom-illness-is-fabricated-or-induced	DfE, department for Health and HO
	Rise Above: Free PSHE resources on health, well-being and resilience https://www.pshe-association.org.uk/curriculum-andresources/resources/rise-above-schools-teaching-resources

https://www.coramlifeeducation.org.uk/scarf/ | Public Health England |
	Medical Conditions: Supporting children in school https://www.gov.uk/government/publications/supportingpupilsa t-school-with-medical-conditions--3	DfE Statutory Guidance
	Mental Health and Behaviour https://www.gov.uk/government/publications/mentalhealth-andbehaviour-in-schools--2	DfE advice
	Rise Above https://riseabove.org.uk/	DfE advice

Homelessness	Homelessness: How local authorities should exercise their functions https://www.gov.uk/guidance/homelessness-code-ofguidancefor-local-authorities https://www.bromley.gov.uk/downloads/file/1293/homelessness_strategy_2018-23	HCLG
Online	Sexting: responding to incidents and safeguarding children https://www.gov.uk/government/groups/uk-council-forchildinternet-safety-ukccis https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/896323/UKCIS_Education_for_a_Connected_World_.pdf	UK Council for child internet safety
Private Fostering	Private Fostering: Local Authorities https://www.gov.uk/government/publications/children-act1989private-fostering https://www.bromleysafeguarding.org/articles.php?id=638	DfE Statutory Guidance
Radicalisation	Prevent duty guidance https://www.gov.uk/government/publications/preventdutyguidance	HO Guidance
	Prevent duty advice for schools https://www.gov.uk/government/publications/protectingchildrenfrom-radicalisation-the-prevent-duty	DfE advice
	Educate against Hate Website https://educateagainsthate.com/	DfE and HO
	Prevent E-Learning https://www.elearning.prevent.homeoffice.gov.uk/la2/screen1.html https://shop.melearning.co.uk/learning/bromley/	DfE advice
Violence	Gangs and youth violence for schools and colleges https://www.gov.uk/government/publications/advice-toschoolsand-colleges-on-gangs-and-youth-violence	HO Advice
	Ending violence against women and girls 2016-2020 strategy (update July 21) https://www.gov.uk/government/publications/strategy-to-end-violence-against-women-and-girls-2016-to-2020/ending-violence-against-women-and-girls-strategy-2016-to-2020-accessible-version	HO Strategy

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	Violence against women and girls: national statement of expectations for victims https://www.gov.uk/government/publications/violenceagainstwomen-and-girls-national-statement-ofexpectations	HO Guidance
	Sexual Violence and sexual harassment between children in schools and colleges https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014224/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf	DfE advice
	Serious violence strategy https://www.gov.uk/government/publications/seriousviolencestrategy	HO Strategy
Modern Slavery	NRM https://www.gov.uk/government/publications/human-trafficking-victims-referral-and-assessment-forms/guidance-on-the-national-referral-mechanism-for-potential-adult-victims-of-modern-slavery-england-and-wales	Gov.uk Guidance
Special Educational Needs and Disabilities Information	SENDIASS Find your local IAS service (councilfordisabledchildren.org.uk)	Local Authority service

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 to the procedures of the three safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

› Behaviour policy
› Pastoral support system
› Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    o Healthy and respectful relationships
    o Boundaries and consent
    o Stereotyping, prejudice and equality
    o Body confidence and self-esteem
    o How to recognise an abusive relationship (including coercive and controlling behaviour)
    o The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    o What constitutes sexual harassment and sexual violence and why they're always unacceptable

The Board of Trustees has an overarching role in ensuring that policies, procedures and training in CONNECT schools are effective and comply with the law at all times.   The Trust's over-arching statement on Safeguarding and Child Protection is available on the website (www.connectschoolsacademytrust.com), but it is the responsibility of all schools within the Trust to develop their own policy to encompass the Trust's ethos.

The Local Governing Board (LGB)
The Governing Board will:

› Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
› Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation
› Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
› Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
› Make sure:

- o The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
- o The DSL takes lead responsibility for understanding the filtering and monitoring systems and process in place in school
- o Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- o All staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- o The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- o That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
- o The school has appropriate filtering and monitoring systems in place and review their effectiveness (See Appendix 10)
- o The DfE's filtering and monitoring standards are reviewed, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- o All staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- o Staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

- › Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - o Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - o Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - o Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

Where we receive an allegation relating to an incident that happened when an individual or organisation was using the school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), this will be dealt with in the same way as any other safeguarding allegation. We will follow our usual policies and procedures, including informing the LADO as appropriate.

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate (see appendix 3).
All governors will read Keeping Children Safe in Education in its entirety.

Designated Safeguarding Lead

Raglan Primary School has designated Safeguarding Leads (DSLs) alongside a team of Deputy Designated Safeguarding Leads (DDSL). The DSL will

- co-ordinate action within the school and liaise with Children's Social Care and other agencies over cases of abuse and suspected abuse;

- act as a source of advice within the school;

- ensure that staff are familiar with the policy and procedures;

- be responsible for record keeping;

- refer individual cases of suspected abuse;

- arrange and lead regular Safeguarding Team meetings; liaising with agencies about individual cases and organising training on child protection within school.

- liaise with the Head Teacher (or deputy in the Head Teacher's absence) advising them of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult to support them in the case of a police investigation or search.

- Have a good understanding of harmful sexual behaviour

- 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 instigators (widely referred to as perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support

- Take lead responsibility for understanding the filtering and monitoring processes which are in place in school

The DSL is supported by a Safeguarding Team which includes a Deputy Designated Safeguarding Lead (DDSL). The Safeguarding Team should consist of no less than two people. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns.
The Safeguarding Team can be contacted Out of Hours, if necessary, using the Safeguarding Email or their mobile phones.
When the DSL is absent, the deputies will act as cover.
If the DSL and deputies are not available, the BASC leads will act as cover. The MASH Team (Bromley Help, Support and Safeguarding Hub for Children and Families) Out of Hours Team or Childline can be contacted in event of a member of staff being uncontactable.

Head Teacher

The Head Teacher must ensure that there is DSL in post and must ensure that up-to-date records relating to Child Protection are kept. These include:

- Staff training records;
- Signed Code of Safe Conduct forms; The Single Central Record (SCR).
- Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website

- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.   This training must include online safety training.

- Ensuring that Induction training refers to safeguarding policy

- 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 relevant staffing ratios are met where applicable, for example the ratios specific to early year's provision.

- Ensuring that each child in the EYFS is assigned a key worker.

- Overseeing the safe use of technology, mobile phones and cameras in the early years setting.

- Making decisions regarding all low-level concerns, although they may wish to collaborate with the DSL on this

Virtual School Heads

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. Bromley's Virtual Head details can be viewed on page 9 above.

All staff

All staff will be given a copy of this Policy in September 2023 and will sign the form to confirm that they have read and understood the Policy and agree to follow it.   In addition, all staff will read and understand Parts 1 and Annex B of the Department for Education's statutory safeguarding guidance, (Keeping Children Safe in Education 2023), and review this guidance at least annually.

Staff will 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).

Staff will know and understand their expectations, roles and responsibilities around the filtering and monitoring systems used in school.

Staff will provide a safe space for pupils who are LGBTQ+ to speak out and share their concerns.

All staff will be aware of:

- Our systems which support safeguarding, including the staff Code of Conduct *and* the role of the designated safeguarding lead (DSL) and deputies, the **Behaviour Policy**, the **Online Safety Policy** and the safeguarding response to children who go **missing from education**.   (See also safeguarding procedures for individual schools within the Trust)

- The early help process (sometimes known as the common assessment framework or Early Help Assessment) and their role in it, including identifying emerging problems, liaising

with the DSL, and sharing information with other professionals to support early identification and assessment

- 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** and **radicalisation**, and **serious violence** (including that linked to county lines) and these are rarely stand alone

- **Extra-familial** harms can take a variety of forms and be multiple

- **Previously looked after children** who potentially remains vulnerable.   All staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together, and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

- The importance of **reassuring victims** that they are being taken seriously and 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, trans or questioning (**LGBTQ+)** can be targeted by other children

  - What to look for to i**dentify children** who need help or protection

- **Children not feeling ready or knowing** how to tell someone that they are being abused, exploited, or neglected.   They may not recognise their experiences as harmful, and may feel embarrassed, humiliated, or may be being threatened. Staff should determine how best to build trusted relationships with children and young people which facilitate communication.

See below for more detail on how staff are supported to do this.

Volunteers

Volunteers and work experience students who work in CONNECT schools will have training on Child Protection issues, be vigilant and understand the processes to report any concerns to a member of staff. A member of the safeguarding team will carry out this training (see also Appendix 2).

Aims

We aim to ensure that:

- Appropriate action is taken in a **timely manner** to safeguard and promote children's welfare

- All staff are aware of their **statutory responsibilities** with respect to safeguarding
- Staff are properly **trained in recognising and reporti**ng safeguarding issues
- All staff are aware of how **GDPR regulations** operate alongside sharing safeguarding information with other agencies.

We will be succeeding when:

- All staff have received appropriate training in child protection issues and procedures, including online safety.
- All staff throughout the academic year will have Prevent training and FGM training (Home Office online training & Enable online training) and are alert to the signs and who to contact.
- All staff receive safeguard updates when necessary and termly update emails regarding Prevent and FGM.
- When all staff receive Online-Safety training and understand potential serious violence linked to county lines.
- Encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the Trust may put in place to protect them.
- All child protection concerns are dealt with promptly and recorded appropriately (with hard paper copies and secure digital recording).
- Information is promptly and carefully assessed and passed to relevant statutory agencies.
- All staff are provided with **Parts 1 and Annex B** of Keeping Children Safe in Education (DfE 2023) and are aware of specific safeguarding issues.
- All Designated Officers undergo formal child protection training every two years (in line with LCSB) and receive regular (annual) safeguarding refreshers (e.g. via e-bulletins) Ensuring that children are taught about safeguarding in an age appropriate way (in-line with DfE 2023 guidance).
- Appropriate filters and appropriate monitoring systems are in place to safeguard children from potential harmful and inappropriate online material, and staff understand their expectations, roles and responsibilities in relation to these.   The DSL has responsibility for understanding the systems in place in school.   (See Appendix 10)
- All staff know the process to make a referral to social care and to seek the support of the DSL or DDSL if the DSL is unavailable.
- We create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.
- All staff are aware of escalating a concern as outlined in BSCB Escalating Concerns policy and adhere to the Whistleblowing Policy.

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 procedures set out by our local safeguarding children's board, which includes what contextual safeguarding is and implications on children.

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This policy is also based on the following legislation:

- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018., which set out who is disqualified from working with children.

- This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

- General Data Protection Legislation 2018

- Teaching Online Safety in School 2019 this guidance from the DfE outlines how schools can ensure their pupils understand how to stay safe and behave online as part of forthcoming and existing curriculum requirements.

- 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 Head Teacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our 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. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment

- 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

- <u>Working Together to Improve School Attendance</u> includes information on how schools should work with local authority children's services where school absence indicates safeguarding concerns

This policy also complies with our funding agreement and articles of association.

Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment
- Preventing impairment of children's mental or 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.

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.

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.

Children includes everyone under the age of 18.

Victim Whilst 'Victim' is a widely understood and recognised term, not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. We will use any term the child feels most comfortable with when managing an incident

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms, however at Raglan we use the term "**Instigator**" as in some cases, abusive behaviour can be harmful to the instigator too. We will decide what's appropriate and which terms to use on a case-by-case basis

The following **three safeguarding partners** are identified in KCSIE (2023) and defined in the Children's Act 2004, as amended by chapter 2 of The Children and Social Work Act (2017). They will make arrangements to work together to safeguard and promote the welfare of local children including identifying and responding to their needs:

- Bromley LA
- Bromley CCG

- Chief of Police

The DSL will attend regular forums with local authority -safeguarding partners and update the safeguarding team on changes in the local authority threshold of need.

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 or disabilities
- 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 have previously been looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated
- In receipt of Early Help

Confidentiality

It is important that all staff and volunteers feel confident that they will be supported if they have to deal with a safeguarding issue.   It is also vital that the confidentiality of parents and pupils is respected.   Staff will be mindful 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 (2015) 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 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 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

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

- Information must be shared on a 'need-to-know' basis, but you do not need consent to share information if a child is suffering, or at risk of, serious harm, or withholding will impinge the support or progress of a child

- Staff should never promise a child that they will not tell anyone about an allegation, as this may not be in the child's best interests

- Confidentiality is also addressed in this policy with respect to record-keeping, see below, and allegations of abuse against staff in Appendix 3

- If staff are at any doubt about sharing information, they should speak DSL/DDSL

- Egress or password document, will be sent for children with safeguard concern

- If a victim asks the school not to tell anyone about sexual violence or sexual harassment:
  - There's no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
  - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
  - The DSL 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 instigator 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 (or deputy)

Information Sharing

Staff will be pro-active in sharing information with local agencies. All staff are trained in UK GDPR/Data Protection Act (DPA) and understand their duties with regard to the legislation and know that they are expected to share safeguarding information effectively.

The school co-operates with our statutory duty if named as a relevant safeguarding agency.

Recognising abuse and taking action

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

If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL/DDSL as soon as possible if you make a referral directly. A referral direct to the local authority can be made at:

https://www.bromley.gov.uk/children-families/reporting-child-abuse

or via the NSPCC website at:

https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/report/

If a child makes a disclosure to you

If a child discloses a safeguarding issue to you including non-recent abuse, you should:

- Always take the disclosure seriously
- 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. 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
- 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. Teaching staff will record on Safeguard and inform the DSL or safeguarding team of the record. Support Staff, Administrators, Visitors (inc supply teachers), site-team and volunteers will record using the form in Appendix 8.

Sign and date the write-up and pass it on to the DSL or member of the safeguarding team immediately. Return to the safeguarding team within 24 hours to ensure that you are notified of action and have access to emotional support if required See Appendix 8

- Alternatively, if appropriate, make a referral to children's social care and/or the police directly (and tell the DSL as soon as possible that you have done so

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

All children should feel supported and kept safe, and never made to feel like they are creating a problem for reporting abuse, sexual violence or sexual harassment.

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

The Department for Education's Keeping Children Safe in Education (2023, p161) 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.

<u>**Any teacher who either:**</u>
- **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**

must immediately report this to the police, personally. This is a 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 and involve children's social care as appropriate.

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

Any member of staff who suspects a pupil is *at risk* of FGM, should speak to the DSL and follow our local safeguarding procedures.

If you have concerns about a child (*as opposed to a child being in immediate danger*)

Signs that should always be a cause for concern may be changes such as:

- Difficulty concentrating and not doing as well at school

- Becoming withdrawn
- Mood or behaviour changes, for example:
    - Becoming more irritable
    - Being angry
    - Aggressive behaviour
    - Clinginess
    - Attention-seeking behaviour
    - 'Acting out'
    - Tiredness
    - Mental health needs, for example, signs of depression, anxiety, eating disorders or post-traumatic stress disorder (PTSD)
    - Self-harming
    - Risk-taking behaviour, for example:
        - Stealing
        - Bullying
        - Running away
        - Sexual activity
        - Trespassing or vandalism
        - Fighting
        - Truancy
        - Using drugs or alcohol, especially if they didn't before

Remember: be professionally curious. If you see something that doesn't feel right, no matter how small, report it to the DSL.

Raglan Primary School and Nursery
Part of Connect Schools Academy Trust

Flowchart of Actions where there are Concerns about a Child
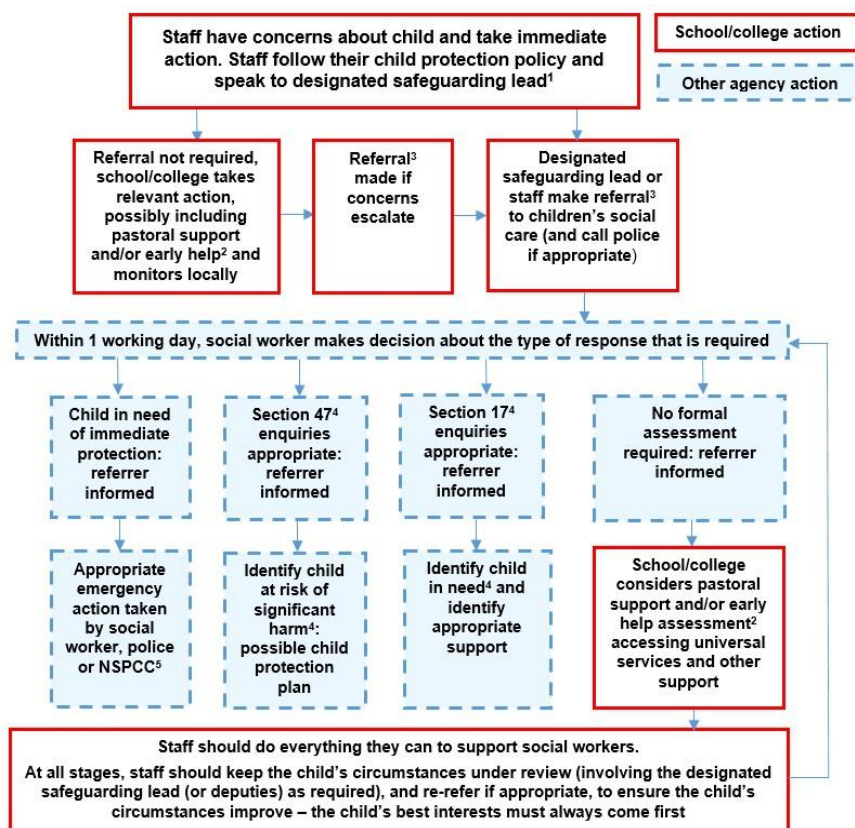
Figure 1 (above and Appendix 8) illustrates the procedure to follow if you have concerns about a child's welfare and the child *is not in immediate danger*.

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly (see 'Referral' below).

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Early Help Assessment

If Early Help is appropriate, the DSL/DDSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements

The DSL/DDSL 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 and reported to the Bromley Local Authority Early Help Assessment Team. At Risk Groups include:

- Young Carers
- Children with SEND

- Pupils with Health Conditions
- Pupils with Mental Health Needs
- Pupils with a family member in prison or are affected by parental offending
- Pupils at risk of Honour-Based abuse (such as FGM or Forced Marriage)
- Pupils who are consistently absent from school, including persistent absences for part of the school day

Referral

If it is appropriate to refer the case to Local Authority Children's Social Care or the police, the DSL/DDSL will make the referral or support you to do so.

If you make a referral directly you must tell the DSL/DDSL as soon as possible and record the incident promptly.

The Local Authority should 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 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 or person who made the referral must contact the Local Authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

If you have concerns about Extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to Local Authority Children's Social Care directly if appropriate (see 'Referral' above).

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

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

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

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

Staff have yearly Prevent Training

Serious Violent Crime

All Staff are aware of the risk factors that increase the likelihood of involvement in serious violence. These include:

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

Indicators which may signal that children are at risk from, or are involved with, serious violent crime include:

- Unexplained gifts and new possessions
- Increased absence from school
- Changes in friendships and relationships
- Significant decline in performance
- Signs of self-harm
- Signs of assault and unexplained injuries
- Changes in behaviour

Modern Slavery

All staff know that Modern Slavery can include:

- Human- trafficking and slavery
- Servitude
- Forced or compulsory labour

This exploitation takes many forms, for example sexual exploitation, forced labour, forced criminality and the removal of organs.

Staff must report any concerns of Modern Slavery / Exploitation to the DSL who make a decision as to whether to refer potential victims to the NRM (National Referral to Modern Slavery Mechanism).

If you have a Mental Health or Wellbeing 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.
All 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 staff have a mental health concern about a child that is also a safeguarding concern, they will take immediate action by contacting the DSL.

Promoting the Wellbeing of children and young people

The school will teach children about safeguarding in order that they can recognise when they are at risk and how to get help when they need it. At Raglan, through various teaching and learning opportunities as part of providing a broad and balanced curriculum, the children will be taught about various aspects of safeguarding including on line safety and strategies to support their personal wellbeing.

Pupils with SEND 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 SEND or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

- Learning Mentor

- Emotional Literacy Support Assistant

- Nurture Group

- Outside agency therapeutic support

- Consistent support plans and risk assessments

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 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 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 and/or academic support

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 has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, the Inclusion Manager, 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 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

Concerns Around Adults in School (about a staff member or volunteer, contractor or supply teacher)

Low-Level Concerns

The term low-level concern does not mean that it is insignificant but it means that the behaviour towards a child does not meet the harms threshold. If there is any doubt as to whether a low-level concern meets the harm threshold, then consult your local authority designated officer (LADO) see page 2 for contact details.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

A low-level concern is any concern – *no matter how small and even if no more than a 'nagging doubt'* – that an adult working in or on behalf of the school may have acted in way that:

- Is inconsistent with the staff code of conduct including appropriate conduct outside of school
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO

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

- Being over friendly with children

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

Sharing low-level concerns

If you have concerns about a member of staff (including a contractor, supply teacher volunteer), or an allegation is made about a member of staff (including a contractor, supply teacher volunteer) posing a risk of harm towards a child/children, speak to the Head Teacher as soon as possible.
Concerns about the DSL should be brought to the attention of the Head Teacher or DSL.
If you have concerns about the Head Teacher, speak to the EHT or, if preferred, the Chair of the Trust Audit and Risk Committee or the governor with responsibility for Safeguarding.

The Head Teacher/Safeguarding Governor/DSL/EHT/Chair of the Trust Audit and Risk Committee will then follow the procedures set out in Appendix 3, in line with Trust procedures, if appropriate.

Following Bromley safeguarding procedures, the school will inform the LADO / Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

Allegations of abuse made against other pupils (Child-on-Child Abuse)

We recognise that children are capable of abusing other children, and that children with SEND are 3 times more likely to be abused than their peers. Abuse will never be tolerated or passed off as "banter" or "part of growing up".   Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the Inclusion Lead.

The DfE has published detailed advice to support schools. The advice from September 2021 is available here:
https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassmentbetween-children-in-schools-and-colleges

This includes, what sexual violence and sexual harassment look like, important context to be aware of, related legal responsibilities for schools and colleges and advice on a whole school approach to preventing child on child sexual violence and sexual harassment.

We adopt a zero tolerance approach to sexual violence and sexual harassment, because we recognise that failure to do so can lead to a culture of unacceptable behaviour and in the worst case scenario, a culture that normalises abuse.

We recognise that even if there are no reports, it doesn't mean it's not happening.

We will always challenge physical behaviour (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.

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
- Prejudice-based and gender-based discriminatory bullying (see Behaviour Policy)
- Involves non-consensual sexual activity, including but not limited to: sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, or sexually inappropriate pictures or videos (including sexting, sharing of nudes and semi-nudes), forcing someone to strip, touch themselves sexually or engage in sexual activity with a third party
- Abuse in intimate/personal relationship between peers
- Involves upskirting (typically when a photograph is taken under a person's clothing without them knowing, for sexual gratification or to cause the victim humiliation, distress or alarm). Upskirting is a criminal offence. Raglan has a zero-tolerance to downblousing.
- Online abuse, including abusive, harassing, misogynistic messages, non-consensual sharing of images (particularly in chat groups) and sharing of abusive images and pornography to those who don't want to receive such content.
- Children who are LGBTQ+ can be targeted by other children. In some cases, a child who is perceived by other children to be LGBTQ+ (whether they are or not) can be just as vulnerable as children who identify as LGBTQ+. Raglan Primary School has a zero tolerance approach to homophobia, biphobia and transphobia.

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

- You must tell the DSL and record the allegation, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a *risk assessment* and *support plan* into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged instigator(s)
- The DSL 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 will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged instigator. We will ask the police if we have any questions about the investigation.

Opportunities to teach safeguarding

We have a duty to ensure that children are taught about how to keep themselves and others safe, including online. Relevant topics will be included within Relationships and Health Education

We understand that we play a crucial role in preventative education which prepares our children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic and sexual violence/harassment. We have a clear ethos and set of Values which are upheld and demonstrated throughout all aspects of our school, and are underpinned by our behaviour policy and pastoral support system, as well as by a planned programme of evidence-based PSHE and RSE using the Coram SCARF materials, delivered in regularly timetabled lessons and reinforced throughout the whole curriculum and in assemblies.

This has been developed to be age appropriate (especially when considering the needs of children with SEND and other vulnerabilities) and will cover issues such as:
• healthy and respectful relationships
• boundaries and consent
• stereotyping, prejudice and equality
• body confidence and self-esteem
• how to recognise an abusive relationship, including coercive and controlling behaviour
• the concepts of, and laws relating to- sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and Female Genital Mutilation (FGM), and how to access support, and
• what constitutes sexual harassment and sexual violence and why these are always unacceptable.

Responding to reports of sexual violence and sexual harassment

Our initial response to a report from a child is important. It is essential that all victims 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 abuse, sexual violence or sexual harassment or the situation dismissed as 'banter'. A victim must never be made to feel ashamed for making a report.

We will follow our usual safeguarding practices in such cases, including:

• not promising confidentiality at this initial stage as it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children's social care) to discuss next steps.

• the report will only be shared with those people who are necessary in order to progress it.

- We will explain to the victim what the next steps will be and who the report will be passed to

- We recognise a child is likely to disclose to someone they trust: this could be anyone on the school staff. It is important that the person to whom the child discloses recognises that the child has placed them in a position of trust.

- We will provide a safe space for children to speak out and share their concerns with members of staff

- We will be supportive and respectful of the child, listening carefully to the child, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc;

- We will devote full attention to the child and listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, staff should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, it is essential a written record is made;

- The staff member will immediately write up a thorough summary only recording the facts as the child presents them. The notes should not reflect the personal opinion of the note taker. Notes of such reports could become part of a statutory assessment by children's social care and/or part of a criminal investigation;

- Where the report includes an online element, we will be aware of searching screening and confiscation advice (for schools) and UKCCIS sexting advice (for schools and colleges).

- The designated safeguarding lead (or deputy) should be informed, as soon as practically possible.
- The DSL should consider that:

    o Parents or carers should normally be informed (unless this would put the victim at greater risk)

    o 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, and

    o 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. Whilst the age of criminal responsibility is 10, if the alleged instigator is under 10, the starting principle of referring to the police remains

- We will (in most cases) engage with both the victim's and alleged instigator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment, but decide it on a case-by-case basis)

- The exception is if there is reason to believe informing a parent or carer will put the child at additional risk

- We will carefully consider what information to provide about the other child involved, and when, making sure that we work with relevant agencies to ensure our approach to information sharing is consistent

- It's good practice to:

  o Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress

  o Meet with the alleged instigator's parents or carers to discuss what is being put in place that will impact them, e.g. moving them out of classes with the victim. You should explain the reason behind any decision

- The DSL or DDSL would attend these meetings, deciding what other agencies should attend on a case-by-case basis

- We will provide support to children who have witnessed sexual violence, especially rape and assault by penetration

- We will try to ensure the victim, alleged instigator(s) and any witnesses are not being bullied or harassed

We will minimise the risk of Child-on-Child abuse or harassment (including sexual) by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing or up-skirting (including down blousing) towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent (RSHE education)
- Ensuring pupils know they can talk to staff confidentially through regularly reinforcing this message and talking to the children, for example in assemblies and circle time and understand their role in preventing and responding where they believe a child may be at risk
- Ensure staff reassure victims that they are being taken seriously
- Being 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
- Ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- LGBTQ+ inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help schools counter homophobic, biphobic and transphobic bullying and abuse. We have a zero tolerance culture towards homophobia, biphobia and transphobia.

The DSL will take the lead role in any disciplining of the alleged instigator(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

Nudes and Semi-Nudes (sexting / 'youth produced sexual imagery')

If staff are 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 *immediately*.

Staff must **not**:

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

Staff must report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. 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 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 will make an immediate referral to police and/or children's social care if:

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the 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 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, in consultation with the Head Teacher 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

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review 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 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, the incident may be referred to the police by dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded promptly.

Child abduction and Community Safety Incident

All staff are knowledgeable in the school's Missing in Education protocol (also see Appendix 4) and Late Collections Policy. Staff adhere to the collection procedures to ensure children only go home with their designated adults. All staff know and understand Private Fostering is an arrangement made privately (ie without the involvement of a local authority) for the care of a child under the age of 16 (under 18, if disabled), by someone other than a parent or close relative, with the intention that it should last for 28 days or more. Staff will inform the safeguarding team if they have information or suspicions regarding Private Fostering.

Staff are aware that Child Abduction is when a child/children are taken from their parents/carers without permission and this can be committed by parents or other family members, by people

known but not related to the child (such as neighbours, friends and acquaintances, and by strangers).

In the event of a Community Safety Incident (such as unknown adult loitering near school or trying to talk to children), or if something is perceived as suspicious or does not feel right, staff will report this (or be informed of) these incidents immediately.

Online Abuse and Cybercrime: 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, our school aims to:
Have robust processes (including filtering and monitoring systems) 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, including mobile and smart technology (which we refer to as 'mobile phones')
Set clear guidelines for the use of mobile phones for the whole school community
Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk
Our approach to online safety is based on addressing the following categories of risk:
Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, antisemitism, 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

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're a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities

around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.   All staff will also receive cyber safety training annually.

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 all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

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

Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively

Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website here.   The Head Teacher is responsible for overseeing the safe use of mobile phones and technology in Early Years.

All staff are aware that technology is a significant component in many safeguarding issues and that abuse can happen online, offline or both (see above Child-on-Child abuse and E Safety Policy). Staff are aware that some groups of children are potentially at more risk of harm than others, including online harm.

Children who are particularly skilled in computing and technology may be drawn into Cybercrime, either deliberately or inadvertently. Cybercrime is defined as criminal activity committed using computers and/or the internet. This includes activities such as hacking, 'denial of service' attacks (where a website is made unavailable), creating and using malware, such as viruses.

We understand that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so).

Mobile phones, cameras and technology

Staff are allowed to bring their personal phones to school for their own use but will limit such use to *non-contact time* when pupils are *not* present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.
 Staff will not take pictures or recordings of pupils on their personal phones or cameras.

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

Visitors will be made aware that they should not use mobile phones whilst on site, and that under no circumstances should they take photographs.

Notifying parents

Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL/ DDSL / ADSL will normally do this in the event of a suspicion or disclosure.   Other staff will only talk to parents about any such concerns following consultation with the DSL.

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

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

Complaints and concerns about school safeguarding practices

Complaints against staff

Complaints against staff (including temporary, supply, coaches or peripatetic teachers) 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).

Whistle-blowing

The Trust has a Whistle Blowing Policy which staff should refer to should they feel that our Safeguarding Policy is unsafe or failing pupils. (Trust Whistleblowing Policy)

Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded, either in writing, or on the Safeguard software. If you are in any doubt about whether to record something, discuss it with the DSL. Paper records will be securely stored and digital records via a secure online platform (Safeguard).

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

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school and in accordance with the Trust's Data Retention Policy. Information will be sent securely to schools on transition which will have been checked by two adults prior to sending and a receipt will be obtained via a secure online portal (for example egress). If a child/children leave the borough or country and there are no details of a receiving school, Bromley Admissions Team and the designated EWO will be informed.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main pupil file.
To allow the new school/college to have support in place when the child arrives, this should be within:

- › **5 days** for an in-year transfer, or within
- › **The first 5 days** of the start of a new term

If the concerns are *significant or complex, and/or social services are involved*, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

Training

All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

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.

All staff will undertake Prevent awareness training and FGM Training throughout the year.

All staff will receive general training about the filtering and monitoring systems in place in school, and will understand that the DSL has responsibility for understanding these systems.

Staff will also receive safeguarding and child protection updates through termly e-mail updates and staff meetings as required.

Volunteers and work experience student will receive appropriate training, if applicable.

The DSLs, Deputies and Assistants

The DSLs, Deputies and Assistants 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 (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

Governors

All governors and trustees will receive appropriate safeguarding and child protection (including online) training at induction, which is regularly updated, to equip them with the knowledge to provide strategic challenge and understand their responsibilities.

Recruitment – interview/appointment panels

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

For agency and third party supply staff written confirmation to show the dated relevant checks and appropriate certificated have be secured by the agency and the enhanced DBS has been provided in respect to the member of staff.

Disqualification Regulations under the Child Care Act

 The school complies with all safeguarding legislation and therefore ensure that anyone who works in, or is directly concerned with managing:

- Early years provision (providing care for a child up to and including reception age)
- Later years provision (providing care outside school hours for children under 8 but not including school activities such as choir and sports teams)

Is not disqualified under the [Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018](#).

Where a third party is used for school activities ,the school will obtain confirmation from the third party that the employer has informed the member of their staff that they will be committing an offence if they work in a school setting or are involved in its management while disqualified from doing so and that they have asked their staff to inform them if they consider that they could be disqualified.

Monitoring arrangements

This policy will be reviewed **annually** by the Head Teacher.   At every review, it will be approved by the full governing board.

Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Code of Conduct
- Complaints
- Children Looked After
- Health and Safety
- Attendance
- Online Safety
- Children with Medical Needs
- Curriculum Policies including Sex and relationship and health education (PHSE/RSE)
- Educational Visits
- Volunteers
- Late Collection
- CSAT Whistle-Blowing
- CSAT Recruitment and Selection Policy and Procedures
- CSAT The Equal Opportunities Policy
- CSAT Disciplinary and Grievance Procedures
- CSAT Data Protection Policy
- CSAT Trust Critical Incident Management Policy

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (2023)

They are not however exhaustive, and staff should make themselves aware of the information contained on the Bromley Safeguarding Children Board website which is regularly updated and links to other very useful safeguarding sites.

http://www.bromleysafeguarding.org/

Appendix 1: Types of Abuse

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

- Seeing or hearing the ill-treatment of another

- Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

Contextual Safeguarding

Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. We recognise that parents and carers may have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Contextual Safeguarding recognises that young people are vulnerable to abuse in a range of social contexts.

If there are any concerns staff and parents should share with the DSL immediately.

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

We will record all information on the checks carried out in the school's single central record (SCR). We follow requirements and best practice in obtaining these checks, as set out below.

Appointing new staff

When appointing new staff, we will:

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

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. Shortlisted candidates should be asked to complete a self-declaration of their criminal record or information that would make them unsuitable to work with children.

In addition, as part of the shortlisting process, we will consider carrying out an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which we might want to explore with the applicant at interview.   We will advise shortlisted candidates that online searches may be done as part of our due diligence checks.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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 (once a week or more often, or on more than 3 days in a 30 day period) in a school or college, for teaching, training, instructing, caring for or supervising children
- Carrying out paid, or unsupervised unpaid, work **regularly** in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

Existing staff

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

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If 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.

Confirmation from the agency that the supply/agency staff, coaches or peripatetic teachers will have completed Safeguarding training from their agencies will be obtained. The staff must read and sign to say they understand KCSIE 2022 Parts 1 & 5 and Annex A & C, the Connect School Child Protection and Safeguarding Policy, Behaviour Policy and the Staff Code of Conduct) p.166 KCSIE 2022

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This 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.

Trainee/student teachers

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 and Childcare Act 2006.

Volunteers

We will:
- *Never* leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers.

- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the Childcare Disqualification (Regulations) 2009 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 trustees and local governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity.

All trustees and local governors will have the following checks:

- Right to work in the UK
- Other checks if, in the last 5 years they have lived, travelled or worked abroad for more than three months
- A section 128 directive if they have any financial responsibility

Work Experience

Adults who supervise pupils on work experience

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

DBS Checking

Where students **over the age of 16** undertake work experience in school, they will be subject to an enhanced DBS check as a volunteer at the school. They *cannot* undertake work experience without this.

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Appendix 3: Allegations of Abuse Made Against Staff

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

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

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

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

Our procedures for dealing with allegations will be applied with common sense and judgement. In the case of an allegation to a member of supply or third party staff, an investigation would precede any dismissal (p 84, KCSIE 2022).

Low level concerns

Sharing low-level concerns

It is essential that any such concerns, including those which do not meet the harms threshold, are shared confidentially with the DSL and are recorded and dealt with appropriately. The DSL will inform the Head Teacher of all the low-level concerns, and ultimately the Head Teacher will make a decision in relation to the concern in collaboration with the DSL. See Appendix 3 for further information on referral processes.

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose and the action taken. The name of the individual sharing their concerns should also be recorded. If the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

Records of low-level concerns will be kept on the staff member's personnel file and reviewed regularly to identify any patterns of behaviour. Where a pattern of behaviour is identified, further advice will be sought from the school's HR representative and/or LADO and the necessary action taken. If, at any time, the harms threshold is met, the case will be referred to the LADO immediately.

As part of the review process, consideration will be given as to whether there are wider cultural issues within the school that enabled the behaviour to occur and, where appropriate, policies will be revised or additional training delivered to minimise the risk of such behaviours being repeated.

When dealing with any allegation against a staff member, supply teacher, volunteer or when dealing with low-level concerns, the Trust Managing Allegations Policy should be consulted and followed

Suspension

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

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

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

Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence) or
- **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 Head Teacher (or EHT where the Head Teacher is the subject of the allegation) – will take the following steps:

- Immediately 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 EHT (acting as the 'case manager') may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of

a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police

- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation

- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate

- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate. They can also seek advice and support from their Trade Union Representative, or from the counselling services offered to staff through the Health Assured EAP Scheme.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

Timescales

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

Individuals returning to work after suspension

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

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

Unsubstantiated or malicious allegations

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

Confidentiality

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

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

- Awareness of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- What can be done 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, what information can be shared and any support for the children involved

- The potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality

- What, if any, information can be reasonably given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

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

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

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious. We will not refer to any repeated concerns or allegations which have all been found to be false, unfounded, unsubstantiated or malicious.

We will refer to substantiated allegations in references, provided that the information is factual and does not include opinions.

Learning lessons

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

This will include consideration of (as applicable):

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

Appendix 4: Specific Safeguarding Issues

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 call the police and all named contacts, and members of staff will search the area around the school.

Children who are absent from education

Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

Further information and support, includes:
•   Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

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

- Are at risk of harm or neglect
- 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 are absent 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 in immediate danger or at risk of harm.

Non-collection of children

If a child is not collected at the end of the session/day, they will be taken to main reception. We will call around all contacts in the first instance. If this does not result in the child being collected, we will advise contacts that if the child is not collected within 30 minutes of the end of the school day, then social services will be contacted.

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. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

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

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

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

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional.

Children who witness domestic abuse, either in the family setting or outside the immediate family are also victims as this can have a lasting effect on children. They may see, hear or experience the effects in their own home or in their own intimate relationships (teenage relationship abuse) in which they may be victims or instigators of abuse. This can have a long term impact on the child's health, well-being and development and their ability to learn.

FGM

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

Page 29 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 may be:
- Having difficulty walking, sitting or standing, or looking uncomfortable o 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

O Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
- Being reluctant to undergo any medical examinations o
- Asking for help, but not being explicit about the problem o
- Talking about pain or discomfort between her legs

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues

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

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

Forced marriage

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

In addition, since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

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

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

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

Preventing radicalisation

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

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

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding children board 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 this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

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

Prohibited Items

Raglan Primary School complies with the DfE Searching, screening and confiscation Guidance 2022: The Head Teacher or staff authorised by them can make the decision to search pupils or their possessions, without consent, if they have reasonable grounds for suspecting prohibited items, such as:
- Knives or weapons
- Alcohol
- Illegal or controlled drugs
- Stolen items
- Tobacco and cigarette papers or vape items

- Fireworks
- Pornographic materials
- Any article that staff reasonably suspect has been, or is likely to:
  - Cause personal injury
  - Damage to property or persons
  - Any items banned by the school and identified in the school rules

No member of staff with carry out any search without a member of the Safeguarding Team present. Parents and carers will be informed of any search.

New Migrant Families

Additional processes have been put in place by the local authority to smooth the transition into school of children from migrant families entering the UK in the light of the Ukrainian crisis. The DSL will work with the local authority when the children start school and will work with the parents and an interpreter to obtain background information.

We will be aware that the child may have witnessed traumatic events, and may be separated from members of the family who remain in the Ukraine.

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 are expected to sign in and wear a visitor's badge. Staff are expected to challenge anyone they see on site without a visitor badge visible.

All visitors to our setting, 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.

Appendix 5: Safeguarding Considerations for Remote Education

On-line safety

All schools are now using more online resources, and the resources used must all comply with the Trust GDPR requirements.   As part of the online planning process we must ensure children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online.   Staff must be aware that some children are more at risk of harm, and that this applies also to online harm.   As well as reporting routes back to the school this should also signpost children to age appropriate practical support from the likes of:

• Childline - for support

• UK Safer Internet Centre - to report and remove harmful online content ⎕

• CEOP - for advice on making a report about online abuse

Online-safety is regularly referenced in whole school assemblies and throughout the curriculum.

We are in regular contact with parents and carers, for example through weekly newsletters and also through the home learning being set each week.   We should use our lines of communication to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will asked to access and be clear who from the school their child is going to be interacting with online.

Parents and carers may well be looking for other support from the many companies offering tuition.   Schools must advise parents of the need to use reputable providers who can evidence their online safety and credentials for having access to children.   Schools should signpost parents and carers to the following support:

• Internet matters - for support for parents and carers to keep their children safe online

• London Grid for Learning - for support for parents and carers to keep their children safe online

• Net-aware - for support for parents and careers from the NSPCC

• Parent info - for support for parents and carers to keep their children safe online

• Thinkuknow - for advice from the National Crime Agency to stay safe online

• UK Safer Internet Centre - advice for parents and carers

Updates for keeping safe online are published on the school website for parent access with details for reporting online abuse.

Appendix 6: Children Adopted from Care

Adoption is a very sensitive issue and Raglan has a process to ensure that the child's move, either into or away from Raglan, is dealt with carefully and with a view to ensure that we do not jeopardise the child or the adoption placement. That a child is in care or adopted should be on a need to know basis. The member of staff with responsibility for looked after children is the Assistant Head Teacher for the phase and this is overseen by the Safeguarding Lead.

The Adoption Process

A child may arrive at school living with their pre-adoptive parents. At this stage, they are still a Child Looked After with parental responsibility shared between the LA and the pre-adoptive parents. The adoption will usually take place some months later at which point the parental responsibility moves to the adoptive parents.

When the child joins the school, the pre-adoptive parents may wish the child to be known by their surname, as it will change to this after the adoption. At this stage, the child must be registered with the legal surname and the pre-adoptive family surname as preferred.

Creating a MIS Record

Although it is likely that a CTF will be available from the previous school, there will be situations in which this is not the case to ensure that the child cannot be traced. If Raglan is the "previous" school, then the designated teacher should liaise with the social worker to determine whether a CTF can be generated with the new school as the destination. If not, the CTF can be generated with LLLL coding and the new school can collect from S2S.

If Raglan is the receiving school, the previous school SHOULD NOT be contacted until the designated teacher has spoken to the social worker.

The paper file should move to the new school via the social worker and the Virtual School who will go through the file to remove any information around the child's previous identity or which might be detrimental to the placement with the adoptive parents. This should also happen if a child is remaining at the same school.

UPN

The DfE guidance https://www.gov.uk/government/publications/unique-pupil-numbers clearly states the need for a new UPN to be issued. The previous UPN should be deleted, and NOT recorded under previous UPN. (There are some very limited situations in which the previous UPN information may be retained, but this is only with the permission of the adoptive parents and the LA adoption service, and a new UPN will still have to be generated).

The issue of a new UPN will mean that historic assessment and other educational data will be lost and have to be re-entered to the MIS against the new identity. As a minimum, this should be end of Key Stage results and summary attendance data for at least an academic year.

In the case of a child in school being adopted and staying at Raglan, the following is a step by step guide to dealing with the situation, which will involve creating a brand new student, making the existing student a Leaver and erasing any links between these two students.

Creating a new student

- Create a new student on the system in the child's new identity
- Enter the relevant class and use the date of adoption as the admission date
- Issue the student with a new UPN
- Ensure that the child's record shows the new address
- Check that the adoptive parents details are copied onto the new record, then break the link with the existing student
- Enter all relevant data relating to dietary, medical, ethnic/cultural and first language (provided y adoptive parents)
- There should be no previous school history or attendance history prior to the adoptive date – student must be treated as a completely new child.
- Enter assessment data as applicable or download from Key to Success

Amending the original student

- Search for the original existing Student and open their record
- The Legal & Preferred Surname and Forename must both read the pre-adopted legal names
- Delete the Student's Photograph
- All Registration details stay with the Student's record (including UPN)
- Delete the current Home Address
- Enter the School address as the Student's Current Address and set the Address Type as Home – This is to ensure that this record will not fail when you submit the next Census Return
- Highlight and Delete all Telephone Numbers and Email Addresses
- Highlight and Delete the Adoptive Parents in Contacts
- Enter the Date of Leaving and the Reason for Leaving as Unknown. In most circumstances the date of leaving will be before the date of adoption.
- Destination After Leaving field to be left blank
- It is important you check if there are any Linked Documents containing any reference to the new Student or his/her new adopted Parents. If so, they will need to be deleted
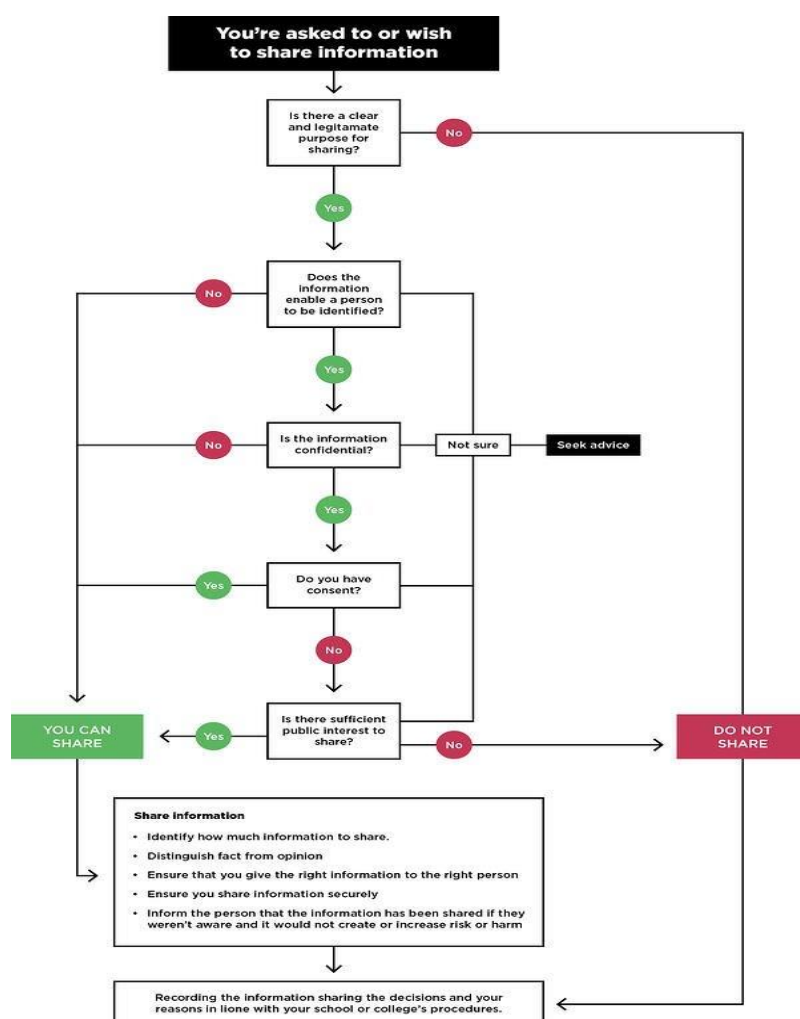
Pupil Premium

Whilst the child is in care, the school will receive Pupil Premium LAC, but once adopted the child will no longer be in the care of the LA. The child can be entitled to receive Pupil Premium (PP+) as a child who has been adopted from care, but the school will need the express permission of the adoptive parents on order to be able to claim this.

Appendix 7 - Information Sharing in Schools: The Seven Golden Rules to Follow

To keep children and young people safe in schools and colleges, you need to share information appropriately so the correct decisions can be made to protect them. This is why the government has outlined the seven golden rules for information sharing as safeguarding involves sensitive information which directly affects the welfare of children and young people.

However, clear boundaries around information sharing or disclosures are important to maintain confidentiality where appropriate. Underneath the seven golden rules for information sharing below, you'll also find a useful flowchart of key questions.

1. GDPR Isn't a Barrier to Sharing Information
2. Be Open and Honest
3. Seek Advice
4. Share With Consent Where Appropriate
5. Consider Safety and Wellbeing
6. Necessary, Proportionate, Relevant, Accurate, Timely and Secure
7. Keep a Record

https://blog.insidegovernment.co.uk/schools/information-sharing-the-seven-golden-rules-to-follow#:~:text=Necessary%2C%20Proportionate%2C%20Relevant%2C%20Adequate,fashion%20and%20also%20shared%20secure

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APPENDIX 8 – Disclosure and Concerns Reporting Form

Recording Form for Safeguarding Concerns

Staff, volunteers and regular visitors are required to complete this form and pass it to a member of the DSL team if they have a safeguarding concern about a child in our school.

If the concern if relating to an adult, pass the form directly to the Head Teacher

Information Required	Enter Information Here
Full name of child	
Date of birth	
Class	
Your name and position in the school	
Nature of concern/disclosure *Please include where you were when the child made a disclosure, what you saw, who else was there, what did the child say or do and what you said.* *[Ensure that if there is an injury this is recorded (size and shape) and a body map is completed]* *[Make it clear if you have a raised a concern about a similar issue previously]*	
Time, date & place of incident:	
Name and position of the person you passing this information to?	
Your Signature	
Time and date form completed	

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Body Map
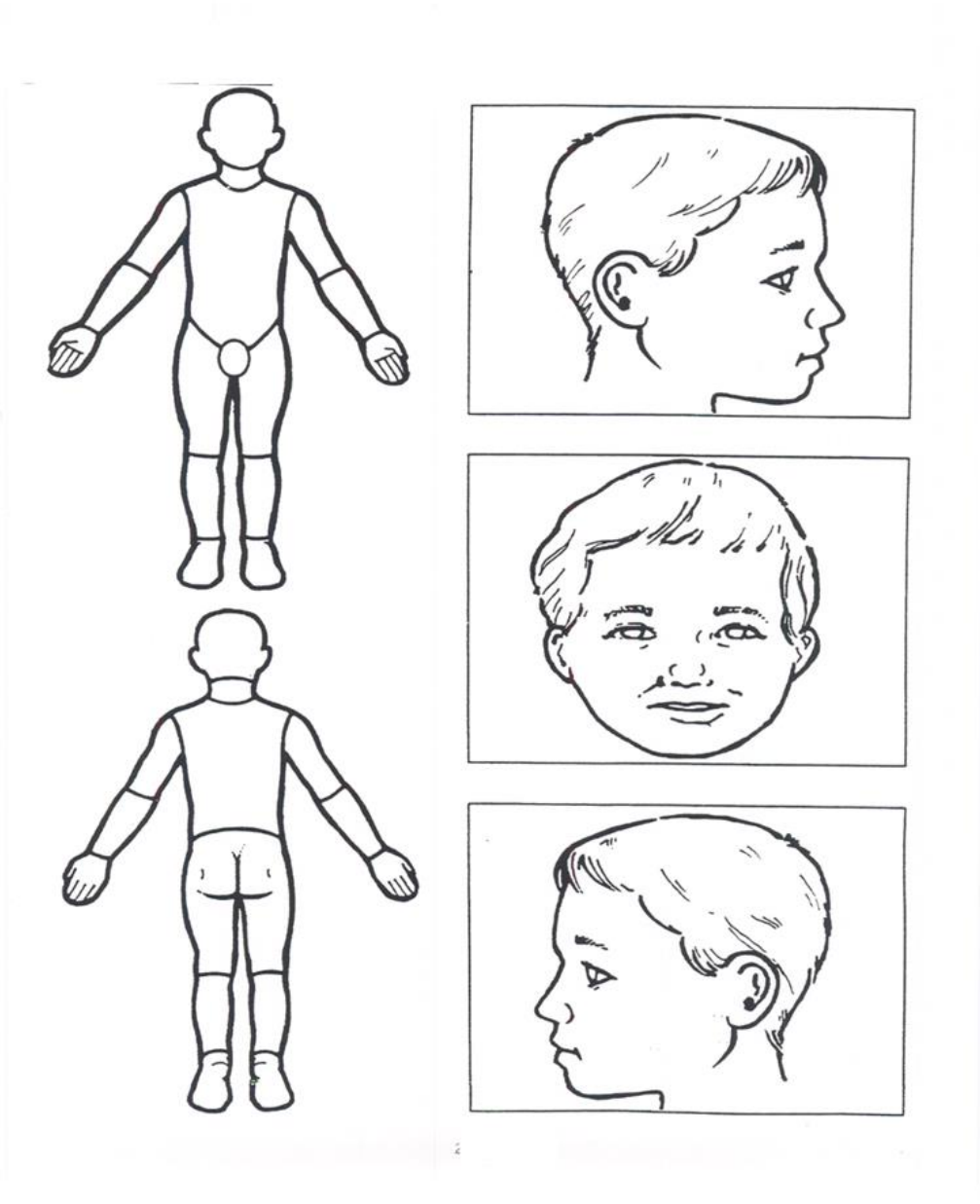
Indicate clearly where the injury was seen / alleged incident took place and attach this to the referral form

Appendix 9: Flowchart of Actions where there are Concerns about a Child

(quick reference)

Staff have concerns about child and take immediate action. Staff follow their child protection policy and speak to designated safeguarding lead[1]

School/college action

Other agency action

Referral not required, school/college takes relevant action, possibly including pastoral support and/or early help[2] and monitors locally

Referral[3] made if concerns escalate

Designated safeguarding lead or staff make referral[3] to children's social care (and call police if appropriate)

Within 1 working day, social worker makes decision about the type of response that is required

Child in need of immediate protection: referrer informed

Section 47[4] enquiries appropriate: referrer informed

Section 17[4] enquiries appropriate: referrer informed

No formal assessment required: referrer informed

Appropriate emergency action taken by social worker, police or NSPCC[5]

Identify child at risk of significant harm[4]: possible child protection plan

Identify child in need[4] and identify appropriate support

School/college considers pastoral support and/or early help assessment[2] accessing universal services and other support

Staff should do everything they can to support social workers.

At all stages, staff should keep the child's circumstances under review (involving the designated safeguarding lead (or deputies) as required), and re-refer if appropriate, to ensure the child's circumstances improve – the child's best interests must always come first

Appendix 10 - Filtering Standard for CSAT

Filtering Standard for CSAT

Schools within CSAT have a managed broadband service with one of two providers.

- **LGfL** provide a filtering system called **WebSense** (powered by NetSweeper).

- **EIS** provide a filtering system called **Smoothwall**.

For both systems TIO IT Consultants have access for the purposes of configuring settings, monitoring for issues, tweaking the filtering, and contacting providers for any support required.

How Filtering Systems Work

Filtering systems have categories that are either allowed or blocked for groups of users. A website that is categorised as abortion may be allowed for staff but blocked for students. Each school has its own list of exceptions as well; websites that are allowed or denied.

If a student goes on a website that contains a computer game and an explicit advert at the side of the webpage then the filtering system will allow the game site, block the advert and show both these entries in the filtering log.

These settings are put into a policy and assigned users or devices. At the CSAT schools there are staff policies which are applied to Windows staff logins computers and staff mobile devices and there are student policies which are applied to Windows student logins and student devices.

Guest Wi-Fi networks intentionally deny users access to the school network but still provide a filtered connection to the Internet via a specific policy.

How Monitoring Systems Work

Monitoring software will log more detailed activity for users of a device. These systems may take snapshots of computer screens if certain key words are triggered and will provide instant reports to designated users. Schools should risk assess if they require monitoring software, or if they can adequately monitor devices using staff observation.

Monitoring systems must be integrated into the school computer network and involve specialist software that runs on the computers in the background. If the school has iPads, these devices will need to have their normal web browser hidden and removed so that users are directed to the monitoring software's web browser for accessing the internet. This is required because monitoring requires all users to be logged in for the capturing of information to be effective.

Overseeing of Systems

TIO Consultants access the filtering systems to check filtering policies and ensure that:
•   They are applying to the correct users and devices on the school network.

•   The correct categories are allowed or denied.

•   The school's custom lists are updated according to need.

School staff can also check the filtering system:

•   **The URL Checker tool** in the filtering system can be used to check a particular website address. Based on the type of user or device you select and the category that the address belongs to, it will tell you if the content is allowed or blocked.

•   **Scheduled reports** can be run that will send data to relevant staff. Schools should choose the reports they feel are most useful. There are several LGfL summary reports available including, Top Websites (Allowed), Top Websites (Denied), Most Active IP Addresses, Top Denied IP Addresses, Category Summary, PREVENT Categories Summary and Adult Content Categories Summary

•   **SWGfL's testing tool** can be run to check that the filtering system is operational. It will show if the school's systems are compliant.

Both providers have confirmed that

•   They are members of the Internet Watch Foundation

•   They implement the CTIRU block list which cannot be bypassed.

•   Techniques and technologies to bypass filtering is also blocked.

Any monitoring software purchased by the school will include reporting functionality that can be configured to provide instant alerts to DSL's for any issue of concern, from suicide to terrorism.
The schools filtering and monitoring provision is reviewed annually by TIO IT Consultants as part of a suite of Cyber Security checks undertaken to ensure the security and integrity of the school network.

Reporting Concerns

Staff should notify a TIO Consultant if unsuitable material has been accessed, if they are teaching topics which could create unusual activity on the filtering logs, there is failure in the software or abuse of the system or if they notice abbreviations or misspellings that allow access to restricted material.

Filtering systems will identify the device name, date, time, and search criteria of an incident.
If a website needs to be blocked or if there are concerns that the filtering system is not operating correctly, staff should immediately log a ticket with the IT consultant who will investigate.

Training

Training is available for DSL's here: https://lgfl.bookinglive.com/book/add/p/5
TO access the filtering system, DSL's can log in with their USO accounts. The Headteacher can provide this access via their USO account with the help of their TIO Consultant.

J. Tillman
TIO Trust Team Manager
November 2023

Appendix 11 - Filtering System Guide
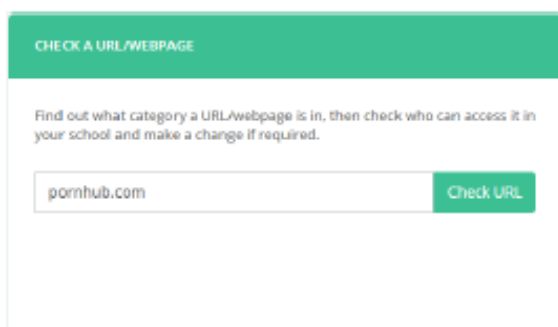
Filtering System Guide

Schools on the London Grid for Learning use a filtering system called WebScreen. DSLs can be given access to this portal and should raise a request with the IT Department to get access. Once this is done, visit the following link and log in with your USO credentials. https://webscreenx.lgfl.org.uk/

Settings have been configured to link the system to the schools' network. Do not change any settings in the system. This website should be accessed to check websites and filtering reports only.
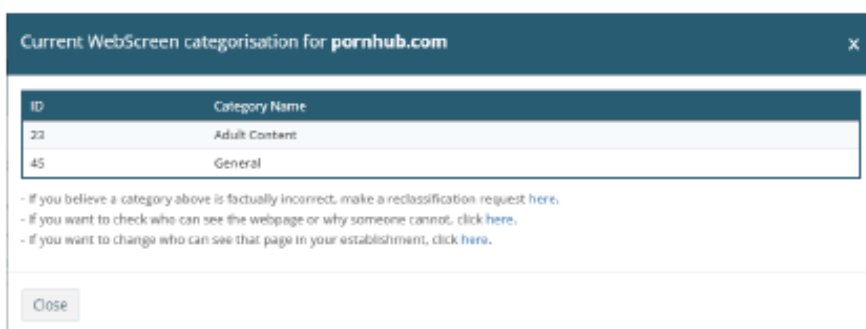
Checking a web address

When logged in, the main dashboard has a Check URL tool. You can type in a web address to quickly check how it's been classified in the system. Most websites will be put into categories that are shared across the LGfL network.Lets check the website pornhub.com to ensure its been categorised.

CHECK A URL/WEBPAGE

Find out what category a URL/webpage is in, then check who can access it in your school and make a change if required.

pornhub.com   Check URL

Current WebScreen categorisation for **pornhub.com**   x

ID	Category Name
22	Adult Content
45	General

- If you believe a category above is factually incorrect, make a reclassification request here.
- If you want to check who can see the webpage or why someone cannot, click here.
- If you want to change who can see that page in your establishment, click here.

Close

In the above example you can see that this website is correctly categorised as adult content.

Click on the link If you want to check who can see the webpage or why someone cannot, click here.

Alternatively go to Policies and choose the Test Tool.

Testing the Filtering

Discuss the Policy Groups and IP Ranges with the IT department so that you understand what parts of the network fall into each policy. Some policies are for devices such as student iPads or staff laptops. Others may be for users such as administrative staff or students.
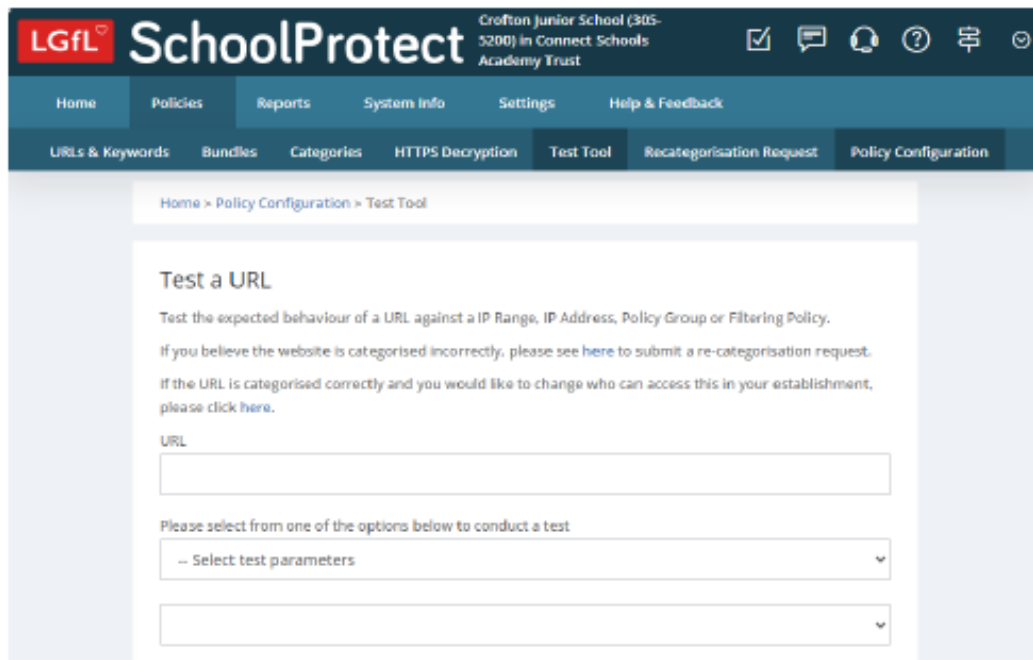
You can then check a website of your choice. From Policies choose the Test Tool. In the example below I have checked the gambling website 888.com against the student devices policy group. As you can see the website is denied.
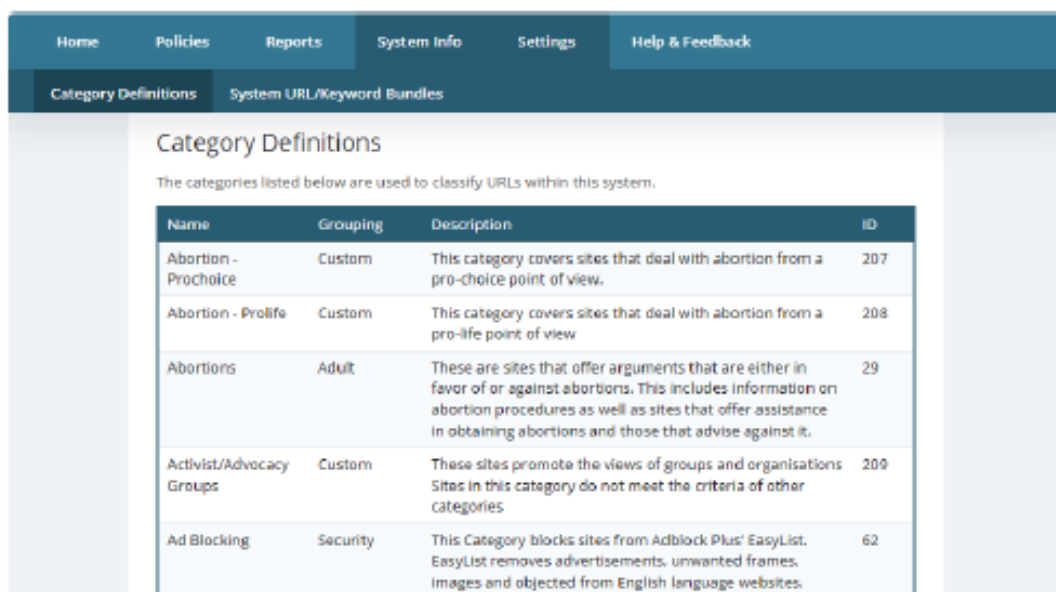
Understanding Categories

The URL checker and test tool, along with the reports in the system all mention categories of websites. To understanding what the categories are you can view the summary by clicking the System Info tab and then clicking Category Definitions.

Running Reports

The Reports menu lets you create a report. On the create reports screen you can select several reports to run. As an example, I will choose On Demand, Summary, and the report 'Category Summary'. In step 2 I will chose last week and in step 3 I will choose all the parts of the school network. Then I will run it.

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The report will show as waiting to be processed. Once it is finished it can be opened by clicking select. In this example I will view a HTML report.
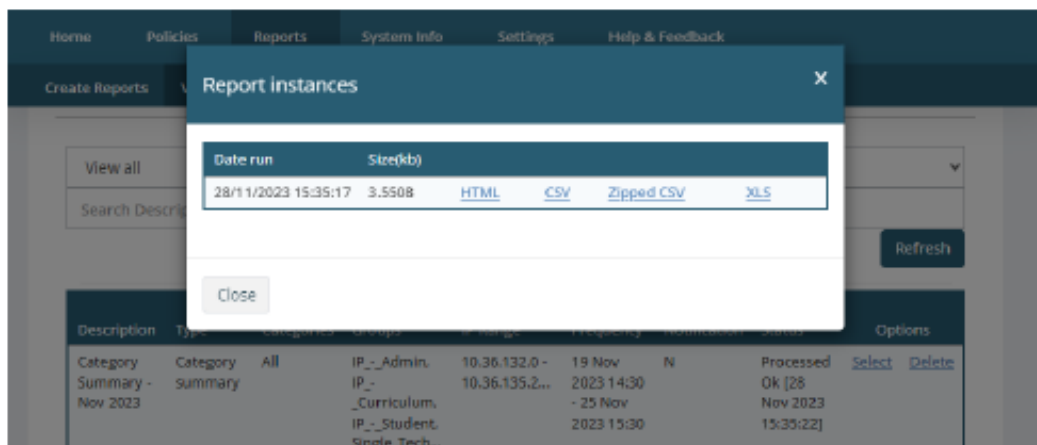
The report will show activity and a summary of the URLS allowed and blocked for each category.

Category summary (Bromley-Crofton Junior School)

Category	Total Requests	Request Percent	Requests Allowed	Requests Denied
General	3001559	38.4%	2796300	205259
Web Proxy	193547	2.48%	0	193547
United States	2122524	27.16%	1951192	171332
Local List	839000	10.73%	815233	23767
Games	6250	0.08%	0	6250
Adware	4617	0.06%	0	4617
Shared List	443466	5.67%	441144	2322
Pornography	281	0%	0	281
Tasteless/Illegal/Questionable	258	0%	0	258

Scheduling Reports

Reports can be emailed to you. For example, you may wish for the prevent categories report to be sent to your email address every Friday.

If you require further help using the system, please contact the IT Department.

J. Tillman
TIO Trust Team Manager
November 2023