

**Worcestershire Children First Safeguarding Children Policy  
(Including Child Protection)- adopted by  
Rigby Hall School**



**September 2020**

This policy is reviewed at least annually by the governing body and was

Last reviewed on Date: 1<sup>st</sup> September 2020  
Next Review Date: 1<sup>st</sup> September 2021

**Signature..... (Chair of Governors)**

**Print Name Huw Powell**

Staff contact and details	3
Introduction	6
Safeguarding Commitment	7
Roles and responsibilities	18
Records, Monitoring and Transfer	21
Procedures for Managing Concerns - 5.9 Children missing from education - 5.10 Children with family members in prison - 5.11 Child Criminal Exploitation (CCE) - 5.12 Child Sexual Exploitation (CSE) - 5.13 County Lines - 5.14 Domestic Abuse - 5.15 Operation Encompass - 5.16 Homelessness - 5.17 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage) - 5.18 FGM mandatory reporting duty for teachers - 5.19 Forced Marriage - 5.20 Preventing radicalisation - 5.21 The prevent duty - 5.22 Channel - 5.23 Peer on Peer/Child on Child abuse - 5.24 Sexual violence and sexual harassment between children in schools and colleges - 5.25 Sexual Harassment - 5.26 Children with additional vulnerabilities - 5.27 Protecting Children - 5.28 Allegations against staff - 5.29 What school and college staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children - 5.30 Managing professional disagreements - 5.31 The use of 'reasonable force' in schools and colleges - 5.32 Private Fostering -LA notification when identifies - 5.33 Children looked after	22
Contextualised Safeguarding	34
Mental Health	35
Children potentially at greater risk of harm	36
Inspection	36
Other relevant policies	37
Annex A - Form 1 for Recording Concerns	38
Annex B – Role of the designated safeguarding lead	39
Annex C - Online Safety	42

## Model Child Protection and Safeguarding Policy 2020

<b>Governors' Committee Responsible:</b>	<b>Curriculum</b>
<b>Governor Lead:</b>	<b>Huw Powell</b>
<b>Designated Safeguarding Lead of Staff:</b>	<b>Samantha Hayward</b>
<b>Prevent Lead:</b>	<b>Samantha Hayward</b>
<b>CSE lead:</b>	<b>Samantha Hayward</b>
<b>Status &amp; Review Cycle:</b>	<b>Statutory Annual</b>
<b>Next Review Date:</b>	<b>6<sup>th</sup> September 2021</b>

## Safeguarding Statement

### COVID-19

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19).

Rigby Hall School will follow the current government guidance to maintain the school as a safe place for pupils.

Rigby Hall School will take reasonable steps to protect staff, pupils and others from coronavirus (COVID-19) within the education setting.

The school will

- Ensure that all pupils regularly wash their hands and put on hand sanitizer as they leave transport and get on to transport.
- Ensure that pupils follow the catch it, bin it, kill it regime and use the yellow topped bins provided.
- Ensure that on line work is provided for all pupils who are absent from school due to COVID-19 and contact parents / carers regularly to ensure that they are ok
- Ensure PPE and cleaning products are provided for all classes.
- Ensure bubbles are secure and do not mix.
- Ensure that any member of staff that comes face to face with a parent / carer is wearing a facemask or visor.
- Ensure that all communal touchpoints (photocopier, drinks urns, lap top trolley, I pad trolley, toilets) have a pack of antibacterial wipes to minimise cross contamination.
- Ensure staff have an environment they can eat their lunch and take breaks in that ensures bubbles can be kept separate and is well ventilated
- Pupils eat their lunch in their bubbles not in a communal area, all cutlery and crockery is washed separately.
- Ensure pupils have support for their anxieties around COVID-19.
- Regularly update the operations manual for school in relation to guidance.
- Ensure pupils receive their entitlement to SALT, school nurse and OT in a safe way. Full PPE is worn by the therapists.

- Ensure all other visitors do not enter the building when pupils are in school, unless it is to rectify a health and safety concern.
- Ensure that the school is cleaned daily and that classrooms and the playground are fogged weekly.

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers>

Rigby Hall School recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Child protection forms part of the school’s safeguarding responsibilities.

The School’s policy safeguarding /Child protection policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2020 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools ), the Non-maintained Special Schools (England) Regulations 2015 (for non-maintained special schools) and the guidance contained in Working Together to Safeguard Children 2018, the DfE’s statutory Guidance “Keeping Children Safe in Education September 2020, Ofsted guidance and procedure

Rigby Hall School is a 4–18 Special School for children with moderate, severe and complex learning needs based in Bromsgrove. We recognise that our children are more vulnerable than other children and endeavour to ensure that they have a safe environment in which to learn. We educate our pupils to keep safe through the curriculum, particularly through PSHEC and computing lessons.

Our pupils travel from across the County to attend our school and we work alongside various agencies from different parts of the County to support them. These include bus drivers and escorts, Occupational Therapists, Speech and Language Therapists, Social Workers (Safeguarding and Children with Disabilities), Early Intervention Family Support, Targeted Family Support, CAMHs, Mentor Link, NHS and the police. Where necessary we also work with alternative providers to ensure our pupils have access to a curriculum that suits their needs.

Pupils are taught in smaller classes that enable their individual needs to be met. Lessons are highly differentiated and supported to ensure all children can access learning.

**Key Personnel:**

---

**The Designated Safeguarding Lead (DSL) is Samantha Hayward**

Contact details:

email: shayward@rigbyhall.worcs.sch.uk

Telephone: 01527 875475 / 07935 223374

---

**The deputy DSL(s) are Tracey Smith**

Contact details:

email: head@rigbyhall.worcs.sch.uk

Telephone: 01527 875475 / 07935 223378

---

**The deputy DSL(s) are Shelley Hughes**

Contact details:

email: shughes@rigbyhall.worcs.sch.uk

Telephone: 01527 875475 / 07716 642824

---

**The deputy DSL(s) are Ben Homer**

Contact details:

email: bhomer@rigbyhall.worcs.sch.uk

Telephone: 01527 875475 / 07922 425004

---

**The nominated safeguarding governor is Huw Powell**

Contact details:

email: thebps@waitrose.com

---

**The Headteacher is Tracey Smith**

Contact details:

email: head@rigbyhall.worcs.sch.uk

Telephone: 01527 875475 / 07935 223378

---

**The Chair of Governors is Huw Powell**

Contact details:

email: thebps@waitrose.com

**Other named staff and contacts:**

- Designated Teacher for Children in Care: Samantha Hayward
- Online safety Co-ordinator: Samantha Hayward
- Safeguarding in Education Adviser, WCC: Denise Hannibal
- Local Authority Designated Officer/Position of Trust: Contact Duty Number on **01905 846211** who will put you through to the LADO on call. Kevin Mills, Bev Fain, Jo Gandy, Kenny Edgar, Emma Arnold or Jon Hancock.
- Family Front Door: **01905 822666** (core working hours)
- Out of hours or at weekends: **01905 768020**

**To submit an online Cause for Concern notification log onto:**

<http://www.worcestershire.gov.uk/childrensocialcare>

## 1. Introduction

1.1 Rigby Hall School fully recognises the contribution it can make to protect and support pupils in School. The aim of this policy is to safeguard and promote our pupils' welfare, safety, health and well-being by creating an honest, open, caring and supportive environment. The pupils' welfare is of paramount importance.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- Keeping Children Safe In Education 2020 – please see DFE website for most updated version.
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- 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
- 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
- [West Midlands procedures:](#)
- [WCF levels of need guidance:](#)
- Staff should have regard to the DfE statutory guidance 'Relationships education, relationships and sex education (RSE) and health education' June 2019 (Last updated July 2019) by including opportunities in the curriculum, specifically through PSHE and ICT, for children to develop the skills they need to recognise and stay safe from abuse and to know who they should turn to for help.

This may include covering relevant issues for schools through Relationships

Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which will be compulsory from September 2020. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects. The statutory guidance can be found here:

[Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#). Colleges may cover relevant issues through tutorials. The following resources may help schools and colleges: • DfE advice for schools:

## teaching online safety in schools

- UK Council for Internet Safety (UKCIS)27 guidance: [Education for a connected-world](#)
- National Crime Agency's CEOP education programme: [Thinkuknow](#)
- Public Health England: [Rise Above](#)

**1.2** This policy applies to all staff, governors, volunteers and visitors to the school. Child protection is the responsibility of all staff. We ensure that all parents and working partners are aware of this policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on the school website and by raising awareness at meetings with parents/carers.

**1.3** Where the Governing Body provides services or activities directly under the supervision or management of school staff, the school's arrangements for child protection will apply. Where services or activities are provided separately by another body, the Governing Body will seek assurance in writing that the body concerned has appropriate policies and procedures in place to safeguard and protect children and there are arrangements to liaise with the school on these matters where appropriate.

## 2. Safeguarding Commitment

**2.1** Rigby Hall School will adopt an open and accepting attitude towards children as part of its responsibility for pastoral care. Staff encourage children and parents/carers to feel free to talk about any concerns and to see school as a safe place when there are difficulties. Children's worries and fears will be taken seriously, and children are encouraged to seek help from members of staff.

**2.2** Rigby Hall School will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to;
- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty.
- Include in the curriculum activities and opportunities (specifically through PSHE/ ICT) which equip children with the skills they need to stay safe from abuse (including online) and to know where to get help.
- Ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on new staff and volunteers who will work with children including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools (s128). For senior leaders in Academies/Independent schools and for Governors in maintained schools (Since September 2018)
- As Education Safeguarding Practitioners we will liaise with the three safeguarding partners in line with Working Together 2018 (updated February 2019)
- Within our local area statistics show in July 2020 that Antisocial behaviour and Violence & sexual offences are the two highest crimes committed and therefore, are particular focus for our school. Data taken from <https://www.crime-statistics.co.uk>

**2.3** Safeguarding in the Curriculum is a key part of education at Rigby Hall School. We use cross curricular lessons to support our pupils and ensure that they are both age and understanding appropriate. We support our pupils' learning through thrive sessions that may further discuss these topics if required, allowing bespoke education for or vulnerable learners.

Children are taught about safeguarding in schools. The following areas are among those addressed in PSHE/SRE and in the wider curriculum.

- **Bullying/Cyber Bullying**

- **Early Years**

- Pupils are taught to be kind to one another and learn how to play appropriately through support of adults and setting up play activities where the pupils can learn to play together, sharing and playing appropriately (not hitting out / snatching).

- **Key Stage 1**

- Pupils talk about how to be a kind friend and dictate which kind of behaviour is typical of being a good friend using pictures and symbols. Pupils then discuss the symbols if appropriate.

- **Key Stage 2**

- We teach about bullying on a daily basis through general support on how to play, share, take turns and how to play fairly. We teach specific bullying lessons through stories and activities through PSHE lessons, this also covers areas of discrimination. We have an anti-bullying week and discussions about what is and isn't bullying. Cyber bullying is taught through Computing lessons, PSHE and in a safety week.

- **Key Stage 3**

- We show explicit examples of bullying using videos and photos. We explore how bullying affects people and recognise emotions involved. We look at what makes a good friend and sorting types of behaviour in to acceptable and unacceptable. We invite outside agencies in to school such as the NSPCC and the Police.

- **Key Stage 4**

- We have Anti-bullying Alliance week every year to highlight bullying and we promote the Odd Socks campaign to celebrate diversity within the school.

- We use real life scenarios and discussions prompted by cards – What would you do? These will then lead in to debates and discussions.

- We look in to the rights at work and what to do if there is bullying in the work place. We use CEOP to support with on line bullying and make our Young People aware of where they can get support.

- **Key Stage 5**

- This is covered through Work Right and Employability Modules – Working with others. It covers respect, communication, how to get support and bullying in the work place. We also cover this topic in focused PSHE sessions.

- **Complex Needs**

- Children in the Chestnut Centre will take part in the whole school anti-bullying week. Children will also have structured play sessions with adults in order to understand and learn how to be a kind friend. The children will be supported to listen to stories about having good friends and will be supported to role play being kind to peers. Children from the Chestnut Centre are highly supported at playtimes and when socialising with others. The children in the Chestnut Centre have a specialist space and resources in order to keep them safe and stimulated. The children are always supervised when using technology.

- Drugs, Alcohol and Substance Abuse

#### **Early Years and Key Stage 1**

Children do not cover these topics explicitly due to their limited understanding of the concepts. However, they learn about healthy and unhealthy. They may use symbols and support to learn to ask for things and to ask for help.

#### **Key Stage 2**

Pupils in Key Stage 2 learn about healthy and unhealthy lifestyles. The content will range from healthy food choices and exercise to drug, alcohol and substance abuse depending on the pupils' ability to comprehend these topics, cope emotionally with talking about them, their level of maturity and background.

#### **Key Stage 3**

We look at what drugs and alcohol are and the effects they have on the body. We use scenarios to decide on good choices and bad choices, sorting symbols of safe / unsafe drugs. We discuss the medication that they may take and why these are safe drugs.

We use photos and videos of the consequences of drug and alcohol misuse to prompt discussion, role play and creative writing. We also have visits from outside agencies such as the police to support the children.

#### **Key Stage 4**

We consolidate learning at Key Stage 3 and use resources such as Drug aware and the Really film and resource pack to support the Young People.

We look at support for substance misuse – who to go to for help.

#### **Key Stage 5**

This is covered through Healthy Living and Drug and Alcohol Awareness Modules (OCNWMR) and discreet PSHE lessons. We consider how to make healthy choices.

#### **Complex Needs**

Children are taught about dangers around us and in the home through practical everyday sessions. For example, children may be taught about cleaning and be supported to ensure they put away cleaning products after using them. The children in the Chestnut Centre will be supported to think about how to keep their own bodies healthy and make good choices about what we eat and drink. Children will therefore be supported through structured teaching, role play and play to learn about healthy foods and healthy bodies.

- Online Safety / Mobile technologies

#### **Early Years and Key Stage 1**

Pupils learn how to use equipment safely, with the support of adults. In Early Years they begin this process by learning how to use a range of equipment (touch screen computers, iPads and table tablet). In Key Stage 1 pupils learn to access technology by turning devices on and selecting games / apps under supervision, requesting apps by asking adults first.

#### **Key Stage 2**

We cover on-line safety through e-safety week and also through Computing topics. Pupils learn about how to recognise and report issues online and who to tell if they are uncomfortable with anything that they see. This is also linked with PSHE and lessons about stranger danger where we aim to make pupils more aware that people may not always be who they seem to be.

#### **KeyStage 3**

We use resources such as CEOP, CHILDNET and the Alison Ruggles Trust to ensure our pupils understand the dangers online.

We use sorting activities and role play to decide what is acceptable and unacceptable to share online. We watch videos of what can happen when you share inappropriate information. We have also had the NSPCC come to talk to the pupils. We work proactively with our pupils when matters arise and use comic strip conversations to address real life online issues.

#### **Key Stage 4**

We use resources from CHILDNET such as 'Trust me' and 'Just send it'. These videos promote work and discussion around the topics.

We also use the Sexting in Schools resource pack to explain to pupils the dangers and the legality of sexting and texting images of themselves or others.

#### **Key Stage 5**

This is covered through discreet PSHE Sessions including Understanding Grooming, Sexting, Digital Footprint, Gaming and Social Media. Meetings with Keyworkers are regularly held to ensure that any personal issues are addressed and personalised lessons delivered as and when required.

#### **Complex Needs**

The children in the Chestnut Centre will be supported to use technology appropriately and safely. The children will be supervised at all times when using or engaging with technology. The children will learn how to look after technology well, using and storing equipment appropriately.

- Stranger Danger

#### **Early Years**

Pupils learn to name people who are significant to them. Pupils learn to ask for help from familiar adults (through symbols and photo cards).

#### **Key Stage 1**

Pupils identify people who are significant to them and identify how they are kind to us. Pupils learn to seek these trusted adults out for help, not people they do not know.

#### **Key Stage 2**

This is taught through stories and activities in PSHE lessons. Pupils are given scenarios and asked to discuss what they would do in a given situation. This then leads to discussion about who we can and cannot trust. This is also linked to online safety and making "friends" online. For many pupils in Key Stage 2 this would be particularly linked to gaming online.

#### **Key Stage 3**

Stranger danger is linked closely with CSE and Online safety. Knowing what to say to Strangers and what not to say. We use instruction writing and role play to model how to behave with strangers. We also learn how to behave in the community through educational visits and teach our pupils what to do if approached by a member of the public.

#### **Key Stage 4**

As with Key Stage 3, pupils are learning about Stranger Danger within the context of their community. Recognising how to speak to people they do not know ie: at a shop and who to approach if concerned. Pupils are also taught to recognise that abuse does not always come from strangers and if someone they know is a danger to them that they should tell someone.

#### **Key Stage 5**

This is covered in the personal safety module (OCNWMR) and revisited when making trips out in to the community, by ensuring that they know how to stay safe and get help if needed.

### **Complex Needs**

The children will be supervised on educational visits to the local community, the children will be supported to learn about 'stranger danger' by using symbols and social stories reminding children not to talk to or touch people they do not know. Children will also be learning to follow an adult agenda (staying with the adult and responding to instructions).

- Fire and Water Safety

### **Early Years and Key Stage 1**

Pupils learn about People Who Help Us, role playing firefighters and engaging in sensory drama where pupils are taught that fire is hot. (e.g. images of fire and touching heated pads.) Pupils are made aware of dangers of water as they are encountered for example on trips if there is a pond, whereby they are shown visual symbols on holding hands and 'looking'.

### **Key Stage 2**

Fire and water safety are taught through role play and stories in PSHE. We also have visits from the Fire Brigade so pupils can see how a fire engine operates. We also go swimming in year 6 and pupils are taught water safety within their lessons. If pupils are visiting areas with water, they are talked to as part of the risk assessment to remind them of expectations and behaviour around water. Pupils in Key Stage 2 attend Bell boating festivals and learn about the safety requirements in boats such as wearing life jackets.

### **Key Stage 3**

In Key Stage 3 fire and water safety is covered in science, knowing how to safely light a Bunsen burner, the properties of fire and water and the dangers they present. Pupils learn about how fire can spread and what is flammable. The Fire Brigade visit school and all pupils get to talk to the Fire Men about their job and how to stay safe.

Some pupils will try out sailing at the local reservoir and will learn about safety on the water and what equipment they need to keep themselves safe.

### **Key Stage 4**

As is Key Stage 3 pupils study topics related to fire through their accredited science courses. They also meet the Fire Brigade and look in to what a job as a Fire Man would be like and what qualifications they would need to become one.

Some pupils may access swimming through leisure activities or be involved with outdoor educational activities such as canoeing, kayaking and raft building.

### **Key Stage 5**

This is covered through the Health and Safety at work modules (ASDAN). Some of our Young People will cover Fire and Water safety through safe use of equipment in Towards Independence Modules (ASDAN). During Duke of Edinburgh lessons and the expedition, we walk along the canal so water safety is essential. Once camping we cook our own food so we learn how to safely use the cookers and not to light fires in the Countryside.

### **Complex Needs**

The children in The Chestnut Centre take part in regular fire alarm exercises and are supported by the use of signs and symbols to exit safely. The children are also supported to learn about fire safety through role playing firemen and women when learning about the roles of 'people who help us'. The children will learn in a fun and practical way about what firemen do to support us. The children in the Centre will

also learn about water safety through visiting places outside of the school grounds and walking safely away from water danger. Children will always be supported to stay safe around water, with the use of symbol and signing support.

- Peer to Peer Abuse

- Early Years and Key Stage 1**

- Pupils are taught to be kind to one another. Adults support the pupils to share and to use kind hands and kind feet. If there are disagreements staff will support the pupils to make friends and will use social stories and comic strip conversations to address the issues and resolve them.

- Key Stage 2**

- This is taught regularly as part of on-going support in making and retaining friendships and in how to play, share and take turns with consideration to other people's feelings.

- Key Stage 3 and Key Stage 4**

- Children are taught about Peer to Peer Abuse through PSHE lessons, they access the Deal resources from the Samaritans to support this work. Within the school ethos the pupils are taught that they have a support network to enable them to report any concerns. There are worry boxes around the school for pupils to use and these are monitored by the school council. Restorative justice is used to support any incidents with children and these help to readdress behaviours. RSE lessons are used to teach about good and bad touch and what is acceptable.

- Pupils learn about consent through lessons using the appropriate resources.

- Specialised agencies such as New Start Network are used for personalised programmes if required.

- Key Stage 5**

- This is covered alongside the online safety PSHE sessions and also through looking at healthy and unhealthy relationships including topics on consent, the law and abuse and controlling behaviour. We teach that it is not always people outside of school who can behave in this way but the people in school or friends.

- Complex Needs**

- The children in the Chestnut Centre are taught to be kind to one another. Use of social stories, role play, stories and singing support the children to treat each other kindly.

- Sexual Violence and Sexual Harassment

- Early Years and Key Stage 1**

- Pupils are taught to respect their bodies through their daily routines e.g. when getting changed for PE, often children will remove underwear with their trousers, and after toileting, they may forget to pull their trousers up, so they are given verbal 'pants on' symbols if required.

- Key Stage 2**

- This is taught through relationships and friendships at this age. We explore what is appropriate and inappropriate touch using the NSPCC Pants resources, including Pantasaurus.

- <https://www.nspcc.org.uk/preventing-abuse/keeping-children-safe/underwear-rule/>

- Key Stage 3 and Key Stage 4**

- RSE lessons cover the topics of rape and sexual assault. Pupils are taught what is right and wrong, legal ages for sex and sexual activities and where to go for support. Links are made to CSE, Stranger Danger and Peer to Peer abuse. Highlighting to our pupils that it is not always a stranger who may attack us is very important. The subject is taught sensitively and appropriately for the understanding of our pupils learning needs.

In science pupils are taught about reproduction and the human body. Some pupils may have protective behaviours workshops run by our own staff or external staff to support with this area.

### **Key Stage 5**

This is taught through learning about healthy and unhealthy relationships in discreet PSHE sessions. It is also covered when looking at digital safety e.g. pornographic materials.

### **Complex Needs**

The children in the Chestnut Centre will learn about their own bodies and the bodies of others. Children will be supported to sensitively learn about 'safe touch' and 'kind hands'. More able children will learn about private parts of the body and where we can safely touch. Children will always be supported to talk or engage with an adult if they are distressed, through various methods of communication.

- Road Safety

### **Early years and Key Stage 1**

In Early Years pupils learn to hold hands of adults around school and on trips with visual support and now and next boards.

In Key stage 1 pupils encounter several walks to the local park (typically the Oakalls park which has lots of roads to cross in a residential area) to develop their road safety, following the road safety code – stop, look and listen (with visual prompts)

### **Key Stage 2**

Road safety is taught through simulations in the playground or a safe place and then transference to real situations through walking around the local environment. The pupils all experience walking down to the local church for services of worship at Harvest, Christmas and Easter. Some children learn bikeability skills to ensure they are safe riding a bicycle on the road.

### **Key Stage 3**

Pupils access trips out of school in various subjects which support crossing the road. They use online games and videos to learn about the dangers of the road and how to stay safe.

### **Key Stage 4**

Pupils are out and about in the community for maths lessons, walking to local shops and cafés to buy things using money. Some pupils are more independent than others and they may walk to school independently or catch a bus. At Key Stage 4 some pupils support younger pupils when walking down to the church for acts of worship.

### **Key Stage 5**

Students learn about road safety when accessing the community, this is achieved through practical sessions in a range of different environments. Some of our young adults receive travel training and use bus and train transport to get to school. Likewise, they travel to different areas such as Worcester and Birmingham using a train or bus.

### **Complex Needs**

The children will be supervised on educational visits to the local community, the children will be supported to learn about road safety by using symbols and social stories reminding children about the dangers of the road. All children will be supported according to ability and understanding and therefore support will be allocated accordingly. Children will also learn road safety awareness by role playing 'traffic' and 'traffic wardens' within the classroom

- Domestic Abuse

### **Early Years and Key Stage 1**

Pupils are taught about healthy relationships through home corner role play, small world play and stories. They are taught to have kind hands, kind feet and kind words through daily expectations, assemblies and throughout their play experiences.

### **Key Stage 2**

In PSHE we discuss how no one should be hurt by another person regardless of age, race, gender, size, disability or sexuality. We do not teach specifically about Domestic Abuse at Key Stage 2 unless there was a specific need to for specific children.

### **Key Stage 3**

We use resources such as Safelives.org.uk and the NSPCC to teach about domestic abuse in PSHE lessons. Pupils are taught that any form of violence is unacceptable and where to go for help. Topics in books in English sometimes link to this and can be explored further.

### **Key Stage 4**

In Key stage 4 we examine the impact of domestic abuse as well as the law around it and how to get help. Pupils learn about support networks such as Women's aid, Young Minds and Victim support.

### **Key Stage 5**

This is taught through learning about healthy and unhealthy relationships in discreet PSHE sessions. We use the Disrespect Nobody resources.

### **Complex Needs**

Children will be supported to talk about and learn about our family and the people at home. The children will be supported to think about how these people help and support us and to in turn, talk about how we can show our affection for each other. Children will be encouraged to think about and talk about what makes a happy home, using supportive material such as talking mats and symbolised support.

- Healthy Relationships / Consent

### **Early Years and Key Stage 1**

Pupils are taught about healthy relationships by learning about who is safe and who is not safe. They learn how to play with their friends and how to trust adults who they know. Pupils learn to be kind to each other. They explore who is in their family, who they like and what makes them feel safe.

### **Key Stage 2**

This is taught through work on friendships in PSHE and also on a regular basis through playtimes where staff advise on consensual play and touch, for example when playing tag and other contact games. In PSHE we also talk about hugging and kissing others and discuss when this is ok and appropriate and when it isn't.

### **Key Stage 3**

We use the Healthy Toolkit to support us in teaching Healthy relationships and consent. We use a variety of resources in PSHE such as Safe4me, NSPCC, Disrespect Nobody and Loveisrespect.org. We learn about different types of family and how they are made up, which links to Modern British Values and RE. In English lessons subject matter is discussed and link in to healthy relationships.

We look at consent in general, is it o to borrow items, touch people and linked to kissing and sexual activities. Pupils learn what is appropriate an inappropriate and how to get support.

### **Key Stage 4**

At Key Stage 4 the pupils are taught about consent and the legalities around it. We use case studies to discuss what actions young people should take. We link Consent to CSE and to alcohol and substance misuse as well as to online safety. We continue to look at what makes healthy relationships, the diversity of different

families and that everyone should feel safe in their home and with their friends. We continue to highlight that people known to you and harm you as well as strangers.

### **Key Stage 5**

Taught through scenarios in discreet PSHE sessions. Our young adults are asked to consider what they believe to be healthy and unhealthy and consider what is acceptable in a relationship. We also discuss how relationships are often portrayed in film and television.

### **Complex Needs**

Children are taught about who they live at home with and who keeps them safe. They will learn how to play with one another through support and symbols and will recognise what makes them feel safe. Children in the Chestnut Centre will explore ways to keep themselves self-regulated and how to express if they are unhappy.

- So called Honour Based Abuse issues (HBA) e.g. Forced Marriage, Female Genital Mutilation (FGM)

### **Early Years and Key Stage 1**

Pupils in Early Years and Key Stage 1 learn that we are all different and that we like different things. They learn about different festivals such as Holi, where we learn a dance and throw paint around. We also learn who is safe and who is not safe.

### **Key Stage 2**

This is taught through work on friendships in PSHE and also on a regular basis through playtimes where staff advise on consensual play and touch, for example playing tag and other contact games. In PSHE we also talk about hugging and kissing others and discuss when this is ok and appropriate and when it isn't. We look at different religions and that everyone is different, we may try food and immerse ourselves in a day linked to a different religion learning that people believe different things.

### **Key Stage 3**

Pupils will be taught that some practices are used around the world that are dangerous through PSHE lessons. We use resources such as the FGM game teachers resource pack and Orchid Project true and false statements.

### **Key Stage 4**

In PSHE we use the Silent Scream documentary, Everybody's business film, Women's support project and the film - Sara's story. Pupils are encouraged to discuss how they would support a friend if they suspected that any of these topics were affecting them.

### **Key Stage 5**

This is taught through functional skills English work by looking at items in the news. Our young adults are asked to consider what some people have been subjected to and why this still happens.

### **Complex Needs**

Children in the Chestnut Centre will be taught about different cultures and beliefs in weekly discreet RE sessions. If applicable to the child's understanding, discussions will be held about making good choices and not keeping secrets. Children will also be encouraged to talk to an adult if they are upset about anything another person is forcing them to do.

- Sexual Exploitation of Children (CSE)

### **Early Years and Key Stage 1**

Children are taught about people who are safe and not safe. They are also taught how to ask for help in communication lessons using voice, signing or symbols.

### **Key Stage 2**

Through PSHE and when we get changed for PE or Swimming we talk about private areas of our bodies and what is ok and not ok to show people. We also talk about when it is ok to show other people e.g. when getting help with going to the toilet or at the doctors. We link to being safe and unsafe online especially through gaming, discussing who we should add as friends on social media and on online gaming platforms.

When we teach about stranger danger we highlight that some people who we meet might want to give us things and this might not be safe for us.

### **Key Stage 3**

In PSHE we learn that people are not always what they seem to be. We use resources such as 'It's not okay' resource pack to teach about CSE. We also have links to Barnardo's, the children's society and the NSPCC Pants campaign. Children are taught that some areas can be unsafe to go to.

### **Key Stage 4**

In PSHE lessons pupils watch the CEOP exploited film to support their learning. They will refer to story lines in soap operas to support learning about CSE and highlight the way grooming happens for young children. An emphasis on other children grooming for gangs is given at this age.

### **Key Stage 5**

This is taught through PSHE and the age of consent through Healthy and Unhealthy relationships. Young people are taught how abusers break these laws and what is in place to help protect children and young people. We use video clips to support learning and draw on the experiences of young people.

### **Complex Needs**

Children in the Chestnut Centre will be taught about different cultures and beliefs in weekly discreet RE sessions. If applicable to the child's understanding, discussions will be held about making good choices and not keeping secrets. Children will also be encouraged to talk to an adult if they are upset about anything another person is forcing them to do.

- Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)<sup>1</sup>.

### **Early Years and Key Stage 1**

In Early Years pupils explore festivals and events familiar to them, e.g. Christmas, Easter, as well as exploring festivals from a wider range of cultures through themed weeks, e.g. Diwali, Holi.

In Key stage 1, pupils follow the Worcestershire RE syllabus, exploring how Christian, Muslim and the Jewish faith is celebrated in the UK and the differences between them. Through these lessons and exploration of activities, pupils are taught to respect and celebrate different beliefs.

### **Key Stage 2**

Key stage 2 also develop their understanding of different cultures and beliefs through RE lessons and through PSHE lessons. Learning that people are different in other cultures. Work around how we should and should not treat people who are different is completed in PSHE lessons and reflection time.

### **Key Stage 3**

---

<sup>1</sup>[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/380595/SMSC\\_Guidance\\_Maintained\\_Schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/380595/SMSC_Guidance_Maintained_Schools.pdf)

Using newspapers and online resources to look at the plight of Refugees, migrants trying to get in to Europe and their plight. We have a Prevent day that supports understanding of the complex factors behind Prevent. This is addressed through PSHE, RE and English.

#### **Key Stage 4**

As in Key Stage 3 Key Stage 4 study the differences in religious beliefs in RE and how these can impact on communities and societies. News stories are reflected on and choices discussed, what would you do if ...? We use resources such as Shamima Begum's story, Trust Me from CHILDNET and Inspire – counter-extremism and women's aid organisation.

Through RE pupils visit places of worship such as a Gurdwara to support their understanding.

#### **Key Stage 5**

We use Living in a Diverse Society module (OCNWMR) to open discussions with our young people about how people are different and choose to hold different beliefs. They are encouraged to participate within the local community and see differences as a strength. We also look at news articles to find out how extremist views have led to violence and persecution.

#### **Complex Needs**

The children will be learning about British values by thinking about rules and responsibilities we have in school and out of school. Children will be supported by adults to follow school rules. Children will engage in supported play with each other in order to learn respect and tolerance of others, and to learn that we are all different. Children will also be supported to engage in various religious festival celebrations, and will be supported to understand and respect all beliefs. As a Centre we would like to ensure all of our children have a voice and will be listened to, we will be supporting pupils to do this by asking opinions – through the use of a 'talking mat'.

## **2.4 Support**

Rigby Hall School recognises that children who are abused or who witness violence may find it difficult to develop a sense of self-worth and view the world in a positive way. For such children school may be one of the few stable, secure and predictable components of their lives. Other children may be vulnerable because, for instance, they have a disability, are in care, or are experiencing some form of neglect. Our school seeks to remove any barriers that may exist in being able to recognise abuse or neglect in pupils with Special Educational Needs or Disability. We will seek to provide such children with the necessary support and to build their self-esteem and confidence.

## **2.5 Raising concerns/complaints.**

We respond robustly when concerns are raised or complaints made (from children, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. The school will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The school's complaints procedures are available on the school website.

### **3. Roles and Responsibilities**

#### **3.1. General**

All adults working with or on behalf of children have a responsibility to safeguard and promote their welfare. This includes a responsibility to be alert to possible abuse and to record and report concerns to staff identified with child protection responsibilities within the school (currently called Designated Safeguarding Leads). Staff should be aware that they may need to work with other services as needed and assist in making decisions about individual children.

The Teachers' Standards 2012 state that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their decisions about individual children.

Every member of staff, including volunteers working with children at our school, is advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned and '*think beyond the obvious*'. When concerned about the welfare of a child, staff members should always act in the interests of the child and have a responsibility to take action as outlined in this policy. They take account of the '*one chance rule*' in relation to honour based abuse issues, that an adult may have only one opportunity to save a potential victim.

All staff are encouraged to report any concerns that they have and not see these as insignificant. On occasions, a referral is justified by a single incident such as an injury or disclosure of abuse. More often however, concerns accumulate over a period of time and are evidenced by building up a picture of harm over time; this is particularly true in cases of emotional abuse and neglect. In these circumstances, it is crucial that staff record and pass on concerns in accordance with this policy to allow the DSL to build up a picture and access support for the child at the earliest opportunity. A reliance on memory without accurate and contemporaneous records of concern could lead to a failure to protect. At Rigby Hall School we use My Concern as a recording tool for all concerns in regards to our pupils.

#### **3.2 The Designated Safeguarding Lead**

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection. This should be explicit in the role-holder's job description (see Annex B, which describes the broad areas of responsibility and activities related to the role).

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputy (or deputies) should be trained to the same standard as the designated safeguarding lead.

Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection, as set out above, remains with the designated safeguarding lead. This responsibility should not be delegated.

The designated safeguarding lead and any deputies should liaise with the three safeguarding partners and work with other agencies in line with Working Together to Safeguard Children. NPCC- When to call the police should help designated safeguarding leads understand when they should consider calling the police and what to expect when they do.

During term time, the designated safeguarding lead and/or a deputy should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

The designated safeguarding lead and any deputies should undergo training to provide them with the knowledge and skills required to carry out the role. The training should be updated every two years. (WCF Education Safeguarding SLA -DSL annual training)

In addition to their formal training as set out above, their knowledge and skills should be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

The names of the Designated Safeguarding Leads for the current year are listed on **page 3** of this document.

All staff should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors. Where the Headteacher is also the sole proprietor, concerns should be reported directly to the Local Authority Designated Officer (LADO).

NSPCC's <https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/> dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by their school or college. Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

### [NSPCC - When to call the police](#)

Statutory guidance contains further information on [The Role and Responsibilities of the Designated Teacher](#)

### **3.3 Maintained school governors**

In accordance with the Statutory Guidance “Keeping Children Safe in Education” September 2020 the Governing Body will ensure that:

- The school has a child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
- The policy should be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
- Governors in maintained schools are required to have an enhanced criminal records certificate from the DBS.

- It is the responsibility of the governing body to apply for the certificate for any of their governors who do not already have one.
- Governance is not a regulated activity and so governors do not need a barred list check unless, in addition to their governance duties, they also engage in regulated activity.
- Schools should also carry out a section 128 check for school governors, because a person subject to one is disqualified from being a governor. Using the free Employer Secure Access sign-in portal via the Teaching Regulation Agency's (TRA)
- Teacher Services' web page, schools can easily check if a person they propose to recruit as a governor is barred as a result of being subject to a section 128 direction.
- The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Head Teacher, a nominated Governor and other staff involved in the recruitment process have undertaken Safer Recruitment Training.
- There are procedures for dealing with allegations of abuse against members of staff and volunteers/ people in a position of trust.
- There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role (at least one deputy) with appropriate arrangements for before/after school and out of term activities.
- The Designated Safeguarding Lead undertakes effective Local authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) via safeguarding e-briefings etc.
- The Head Teacher, and all other staff and volunteers who work with children (including early years practitioners within settings on the school site), undertake appropriate training which is regularly updated (at least every year); and that new staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities (including this policy and Part 1 of Keeping Children Safe in Education 2020). Training should include FGM/Prevent/Child Exploitation.
- Any deficiencies or weaknesses in these arrangements brought to the attention of the Governing Body will be rectified without delay.
- The Chair of Governors (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against the Head Teacher, with advice and guidance from the Local Authority Designated Officer (LADO).
- Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers - "Guidance for Safer Working Practice for those who work with children in education settings October 2015".
- Information is provided to the Local Authority (on behalf of the WSCP) when requested, for example through the Annual Safeguarding Return (e.g. section 175 audit and the [GET SAFE risk assessment tool](#)).
- Governing bodies and proprietors should ensure that children are taught about safeguarding, including online safety. Schools should consider this as part of providing a broad and balanced curriculum.
- There is an individual member of the Governing Body who will champion issues to do with safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and reports to the Governing Body.
- The school contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2018 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).

- GDPR- It is important that governing bodies and proprietors are aware that among other obligations, the Data Protection Act 2018 and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure in [Data protection: toolkit for schools](#) - Guidance to support schools with data protection activity, including compliance with the GDPR.
- The school complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. In conjunction with the Head and DSL they should assess the level of risk within the school and put actions in place to reduce that risk

### **3.4 Head Teacher**

The Head Teacher of the school will ensure that:

- The Safeguarding policies and procedures adopted by the Governing Body are effectively implemented and followed by all staff.
- Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.
- Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to a child or young person are notified to the Local Authority Designated Officer in a timely manner.
- All staff and volunteers feel able to raise concerns about poor or unsafe practice in regard to children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).
- All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children's Services) or the Police.

## **4 Records, Monitoring and Transfer**

**4.1** Well-kept records are essential to good child protection practice. All staff are clear about the need to record and report concerns about a child or children within the school. The record should include the child's words as far as possible and should be timed, dated and signed. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

**4.2** Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

**4.3** Child protection records are stored securely, with access confined to specific staff, e.g. Designated Safeguarding Leads and the Head Teacher.

**4.4** Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals (eg child who repeatedly goes missing) and ensuring these are acted upon. Each stand - alone file should have a chronology of significant events.

**4.5** When children transfer school, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to

pass these directly to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, should be copied.

**4.6** A record of any allegations (proven) made against staff is kept in a confidential file by the Head / Principal.

## **5. Procedures for Managing Concerns**

**5.1** Rigby Hall School adheres to child protection procedures that have been agreed locally through the Safeguarding Worcestershire <https://www.safeguardingworcestershire.org.uk/>

**5.2** Where we identify children and families in need of support, we will carry out our responsibilities in accordance with the [West Mercia Consortium inter-agency procedures](#) and the [WSCP Levels of Need Guidance](#).

**5.3** The Designated Safeguarding Lead (DSL) should be used as a first point of contact for concerns and queries regarding any safeguarding concern in our school. Any member of staff or visitor to the school who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

**5.3** All concerns about a child or young person should be reported without delay and recorded in writing using My Concern, all staff have log ins and are able to report a concern, attach documents and add body maps using MY Concern.

**5.4** The DSL will consider what action to take and have appropriate discussions with parents/carers prior to referral to children's social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation

**5.5** All referrals will be made in line with [local procedures](#) as detailed on the [Worcester Children First Website](#).

**5.6** If, at any point, there is a risk of immediate serious harm to a child a referral should be made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head teacher. Concerns should always lead to help for the child at some point.

**5.7** Staff should always follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:

- the situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable;
- they are convinced that a direct report is the only way to ensure the pupil's safety.

**5.8** Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head teacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point they should contact Children's Services directly with their concerns.

## **5.9 Children missing from education**

All staff should be aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and can also be a sign of child criminal exploitation including involvement in county lines. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future. Staff should be aware of their school's or college's unauthorised absence and children missing from education procedures. School contacts families to find out why children are not in school. This is recorded and monitored. Children are discussed with Education Welfare Support and the best course of action for supporting children to return to school is sought. Children who have missed education for ten days consecutively are reported to the authority using the designated form, and this is followed up by the CME team.

### **5.10 Children with family members in prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. NICCO provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **5.11 Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or to threaten other young people. Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late; and
- children who regularly miss school or education or do not take part in education.

### **5.12 Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media).

The above CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

The department provide: [Child sexual exploitation: guide for practitioners](#)

### **5.13 County lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”.

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children’s homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as ‘plugging’, where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

Further information on the signs of a child’s involvement in county lines is available in guidance published by the [Home Office](#).

### **5.14 Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

### **5.15 Operation Encompass**

Rigby Hall School are receiving Operation Encompass Notifications. Operation Encompass is to highlight that a Domestic Abuse Incident has taken place and the police have been called. It is about keeping an eye on changed behaviour and logging anything out of the ordinary. Operation Encompass is working really well in Worcestershire Schools and Worcestershire Children First have successfully notified over 5500 incidents. All this is great news for children and their families. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform Worcestershire Children First, who then inform the School (usually the Designated Safeguarding Lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable support to be given to the child according to their needs.

## 5.16 Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

In most cases school and college staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the designated safeguarding lead (or a deputy) should ensure appropriate referrals are made based on the child's circumstances. The department and the Ministry of Housing, Communities and Local Government have published joint statutory guidance on the provision of accommodation for 16 and 17 year olds who may be homeless and/or require accommodation: [here](#).

## 5.17 'honour-based' abuse (including Female Genital Mutilation and Forced Marriage)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as **breast ironing**. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

### Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers.

### **5.18 FGM mandatory reporting duty for teachers**

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by “to discover that an act of FGM appears to have been carried out” is used for all professionals to whom this mandatory reporting duty applies. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.<sup>105</sup> Unless the teacher has good reason not to, they should still consider and discuss any such case with the school’s or college’s designated safeguarding lead (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

#### **What should schools do?**

Rigby Hall School will contact Family Front door when they have a concern about a child, they should contact Family Front Door if the concerns are based on more concrete indicators – i.e., the young person says this is going to happen to them, or disclosure that it has happened to them or to an older sister – schools should make a child protection referral and inform the Police as required by the mandatory reporting duty. Schools should not:

- Contact the parents before seeking advice from children's social care;
- Make any attempt to mediate between the child/young person and parents.

It is important to keep in mind that the parents may not see FGM or Breast Ironing as a form of abuse; however, they may be under a great deal of pressure from their community and or family to subject their daughters to it. Some parents from identified communities may seek advice and support as to how to resist and prevent FGM for their daughters, and education about the harmful effects of FGM and Breast Ironing may help to make parents feel stronger in resisting the pressure of others in the community. Remember that religious teaching does not support FGM or Breast Ironing.

#### **The ‘one chance’ rule**

In the same way that we talk about the 'one chance rule' in respect of young people coming forward with fears that they may be forced into marriage, young people disclosing fears that they are going to be sent abroad for FGM are taking the 'one chance', of seeking help.

It is essential that we take such concerns seriously and act without delay. Never underestimate the determination of parents who have decided that it is right for their daughter to undergo FGM. Attempts to mediate may place the child/young person at greater risk, and the family may feel so threatened at the news of their child's disclosure that they bring forward their plans or take action to silence her.

### **5.19 Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence,

threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. The Forced Marriage Unit has published [statutory guidance](#) and [Multi-agency guidelines](#), pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmf@fco.gov.uk](mailto:fmf@fco.gov.uk).

## 5.20 Preventing radicalisation

Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

As defined in the Government's Counter Extremism Strategy, <https://www.gov.uk/government/publications/counter-extremism-strategy>.

As defined in the Revised Prevent Duty Guidance for England and Wales, <https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>.

As defined in the Terrorism Act 2000 (TACT 2000), <http://www.legislation.gov.uk/ukpga/2000/11/contents>

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral. The school's or college's designated safeguarding lead (and any deputies) should be aware of local procedures for making a Prevent referral.

## 5.21 The Prevent duty

All schools and colleges are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard109

to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty should be seen as part of schools’ and colleges’ wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised [Prevent duty guidance: for England and Wales](#). The guidance is set out in terms of four general themes: risk assessment, working in partnership, staff training, and IT policies.

There is additional guidance: [Prevent duty guidance: for further education institutions](#) in England and Wales that applies to colleges.

## 5.22 Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual’s engagement with the programme is entirely voluntary at all stages. Guidance on Channel is available at: [Channel guidance](#).

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.

## 5.23 Peer on peer/child on child abuse

Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

## 5.24 Sexual violence and sexual harassment between children in schools and colleges Context

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

- making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up;
- not tolerating or dismissing sexual violence or sexual harassment as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”; and
- challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

What is sexual violence and sexual harassment? It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act 2003 as described below:

**Rape:** A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

**Assault by Penetration:** A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

**Sexual Assault:** A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

**What is consent?** Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

## 5.25 Sexual harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual “jokes” or taunting;

- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include: non-consensual sharing of sexual images and videos;

- sexualised online bullying;
- unwanted sexual comments and messages, including, on social media;
- sexual exploitation; coercion and threats; and upskirting.

## Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

The response to a report of sexual violence or sexual harassment. The 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

If staff have a concern about a child or a child makes a report to them, they should follow the referral process. As is always the case, if staff are in any doubt as to what to do they should speak to the designated safeguarding lead (or a deputy). Additional advice and support

- What to do if you're worried a child is being abused – DfE advice
- Domestic abuse: Various Information/Guidance - Home Office (HO)
- Faith based abuse: National Action Plan - DfE advice
- Relationship abuse: disrespect nobody - Home Office website

*On page 95 of KCSIE September 2020, you will find additional advice and support.*

## 5.26 Children with additional vulnerabilities

There are many children who have additional needs or whose living arrangements may mean that they are more vulnerable to harm, for example children with special educational needs, disabled children, children in public care or privately fostered children. It is essential that the school knows who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children (for example, Virtual School for Children in Care).

The school will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration; no single point of contact for the school as a child has a number of care-givers and involved professionals; assumptions that state approved care-givers are providing safe care for the child; communication needs of a child which can lead to over reliance on parental accounts and interpretations.

## 5.27 Protecting children

- Governing bodies and proprietors should be doing all that they reasonably can to limit children’s exposure to the above risks from the school’s or college’s IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.
- Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.
- The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: [UK Safer Internet Centre: appropriate filtering and monitoring](#).
- Guidance on e-security is available from the [National Education Network](#). Support for schools is available via the: [schools' buying strategy](#) with specific advice on procurement here: [buying for schools](#).
- Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors should consider a whole school or college approach to online safety. This will include a clear policy on the use of mobile technology in the school or college. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and the school and college should carefully consider how this is managed on their premises.
- Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

## Education at home

- Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: [safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education](#)

## 5.28 Allegations against staff

Rigby Hall School should be mindful of the position of trust that they are in when working within an education setting. They need to comply with guidance about conduct and safe practice, including safe use of mobile phones. Pupils' allegations or concerns about staff conduct will be taken seriously and followed up in a transparent and timely way.

This part of the guidance is about managing cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity with children in a school or college. This guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers has:

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

- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

This part of the guidance relates to members of staff, supply staff and volunteers who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Members of staff, **supply staff and volunteers** who are currently working in any school or college regardless of whether the school or college is where the alleged abuse took place. Allegations against a teacher who is no longer teaching should be referred to the police. Historical allegations of abuse should also be referred to the police.

Schools and colleges as employers have a duty of care to their employees. They should ensure they provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the school or college are not the employer of an individual they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

## Supply Teachers

- In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency or business (referred to in this section as ‘the agency’).
- Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome. Governing bodies and proprietors should discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.
- Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children’s social services. The school or college will usually take the lead because agencies do not have direct access to children or other school staff, so they will not be able to collect the facts when an allegation is made, nor do they have all the relevant information required by the LADO as part of the referral process. Supply teachers, whilst not employed by the school or college, are under the supervision, direction and control of the governing body or proprietor when working in the school or college. They should be advised to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the school during the investigation.
- When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency’s human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

### **5.29 What school and college staff should do if they have safeguarding concerns about another staff member who may pose a risk of harm to children**

If staff have safeguarding concerns, or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- this should be referred to the headteacher or principal;
- where there are concerns/allegations about the headteacher or principal, this should be referred to the chair of governors, chair of the management committee or proprietor of an independent school; and
- in the event of concerns/allegations about the headteacher, where the headteacher is also the sole proprietor of an independent school, this should be reported directly to the designated officer(s) at the local authority.

The Headteacher (or Chair of Governors) on all such occasions will discuss the content of the allegation with LADO, prior to undertaking any investigation.

The school will follow the DfE and West Mercia procedures [LA procedures](#) for managing allegations against staff, a copy of which is available in school.

Where a head teacher is also the sole proprietor of an independent school it is now mandatory to report to the LADO

The Head teacher (or Chair of Governors) will be guided by the LADO and an HR consultant when considering suspension or other neutral protective steps.

Publication of material that may lead to the identification of a teacher who is the subject of an allegation is prohibited by law; this includes verbal conversations or written material including content placed on social media sites.

### **5.30 Managing Professional Disagreements**

On occasions there will be disagreements between professionals as to how concerns are handled and these can impact on effective working relationships. The school will support staff to promote positive partnerships within school and with other agencies and will ensure that **staff** are aware of how to escalate concerns and disagreements if appropriate and use the WSCP escalation procedures<sup>7</sup> if necessary.

<sup>7</sup><http://westmidlands.procedures.org.uk/local-content/4gjN/escalation-policy-resolution-of-professional-disagreements>

### **5.31 The use of 'reasonable force' in schools and colleges**

There are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

• Departmental advice for schools is available <https://www.gov.uk/government/publications/use-of-reasonable-force-in-schools>

• Advice for colleges is available on the AOC website. <https://www.aoc.co.uk/>

### **5.32 Private fostering - LA notification when identified**

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of school staff through the normal course of their interaction, and promotion of learning activities, with children.

The school or college should then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

See DfE statutory guidance [Children Act 1989 Private fostering](#) for comprehensive guidance on private fostering

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Most privately fostered children remain safe and well but safeguarding concerns have been raised in some cases, so it is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

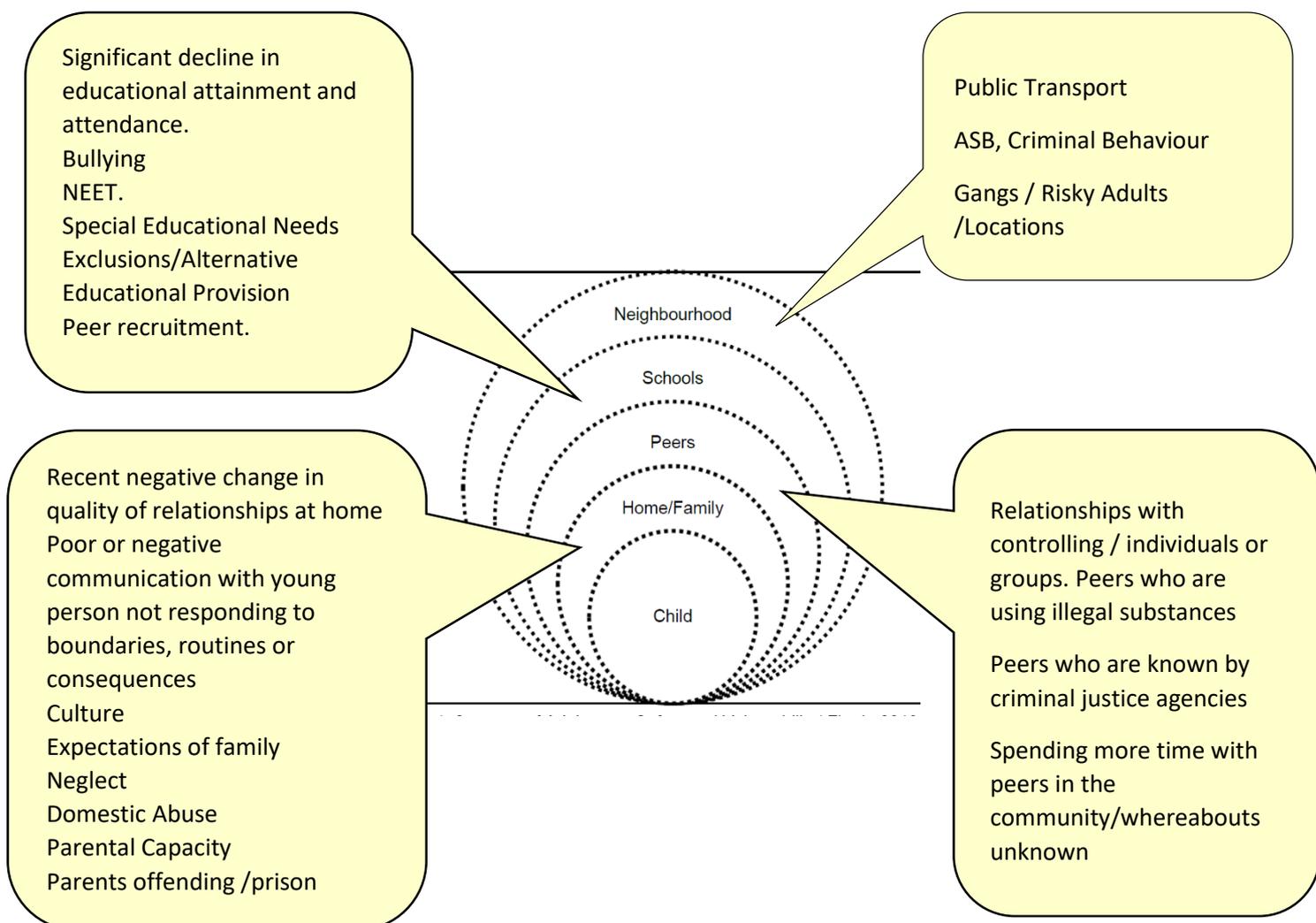
### **5.33 Looked after children and previously looked after children**

The most common reason for children becoming looked after is as a result of abuse and/or neglect. Governing bodies and proprietors should ensure that staff have the skills, knowledge and understanding to keep looked after children safe.

In particular, they should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents, or on an interim or full care order) and the child's contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated Safeguarding lead should have details of the child's social worker and the name of the Virtual School head in the authority that looks after the child.

## **6 Contextualised Safeguarding**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.



## 7 Mental Health

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

The department has published advice and guidance on Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools (which may also be useful for colleges). In addition, Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive promote positive health, wellbeing and resilience among young people including its guidance Promoting children and young people's emotional health and wellbeing. Its resources include social media, forming positive relationships, smoking and alcohol. See Rise Above for links to all materials and lesson plans.

## **8 Children potentially at greater risk of harm**

Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Findings from the Children in Need review, '[Improving the educational outcomes of Children in Need of help and protection](#)' contains further information; the conclusion of the review, '[Help, protection, education](#)' sets out action Government is taking to support this.

## **9 Inspection**

- Since September 2019, Ofsted's inspections of early years, schools and post-16 provision are carried out under Ofsted's Education Inspection Framework. Inspectors will always report on whether or not arrangements for safeguarding children and learners are effective.
- In addition to the framework and inspections handbooks, Ofsted publishes specific guidance to inspectors on inspecting safeguarding: Inspecting safeguarding in early years, education and skills settings.
- The Independent Schools Inspectorate (ISI) is approved to inspect certain independent schools and will also report on safeguarding arrangements. ISI has a published framework which informs how it inspects at Independent Schools Inspectorate.

### ***Other Relevant Policies***

The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond compliance with child protection procedures. The safeguarding duty is relevant for the discharge of all functions and activities. This policy needs to be considered in conjunction with the following policies which can be found on the school website.

- Behaviour Management
- Staff Code of Conduct
- Racist Incidents
- Anti-Bullying (including Cyber Bullying)
- Physical Interventions/Restraint (DfE Guidance "Use of Reasonable Force" and "Screening, Searching and Confiscation")
- Special Educational Needs
- Sexual Violence and Sexual Harassment Policy
- Trips and Visits
- Work Experience and Extended Work Placements
- First Aid and the Administration of Medicines
- Health and Safety
- Healthy Relationships
- Education
- Site Security
- Complaints Procedure
- Safe and Appropriate Use of Images
- Equal Opportunities
- Toileting/Intimate Care
- Online Safety
- Extended School Activities
- Supporting Pupils/Students with Medical Conditions
- Looked After Children
- Private Fostering
- Preventing Extremism and Radicalisation
- Whistleblowing

**Annex A**

**Logging a Concern about a Child’s Safety and Welfare – all staff and visitors**

Pupil's name:		DOB:	Year:
Date:		Time:	
Name:  .....		.....	
Print		Signature	
Position:			
Note the reason(s) for recording the incident.			
Details of concern/incident - record the who/what/where/when factually (use reverse or continuation sheet if necessary):			
Any other relevant information (witnesses, immediate action taken)			
Action taken			
Reporting staff signature .....		Date .....	
DSL – Response/Outcome			
DSL signature .....		Date .....	

## **Annex B: Role of the Designated Safeguarding Lead**

Governing bodies, proprietors and management committees should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety). This should be explicit in the role holder's job description. This person should have the appropriate status and authority within the school to carry out the duties of the post. They should be given the time, funding, training, resources and support to provide advice and support to other staff on child welfare and child protection matters, to take part in strategy discussions and inter-agency meetings, and/or to support other staff to do so, and to contribute to the assessment of children.

### **Deputy designated safeguarding leads**

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

### **Manage referrals**

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required;
- support staff who make referrals to local authority children's social care;
- refer cases to the Channel programme where there is a radicalisation concern as required;
- support staff who make referrals to the Channel programme;

refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and

- refer cases where a crime may have been committed to the Police as required. Work with others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners;
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations;
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member;
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice and expertise for all staff.

## Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements.

have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so;

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff;
- are alert to the specific needs of children in need, those with special educational needs and young carers;
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation;

understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations and practitioners;

- are able to keep detailed, accurate, secure written records of concerns and referrals;
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation;

are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college;

- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online;

- obtain access to resources and attend any relevant or refresher training courses; and

encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

## Raise Awareness

The designated safeguarding lead should:

- ensure the school's or college's child protection policies are known, understood and used appropriately;
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this;
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school and college leadership staff.

Their role could include ensuring that the school or college, and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

## Child protection file

Where children leave the school or college (including for in-year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving.

For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

## Availability

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable.

It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

## Annex C: Online Safety

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation; sexual predation: technology often provides the platform that facilitates harm. An effective approach to online safety empowers a school or college to protect and educate the whole school or college community in their use of technology and establishes mechanisms to identify, intervene in, and escalate any incident where appropriate.

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

- content: being exposed to illegal, inappropriate or harmful material; for example pornography, fake news, racist or radical and extremist views;
- contact: being subjected to harmful online interaction with other users; for example commercial advertising as well as adults posing as children or young adults; and
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example making, sending and receiving explicit images, or online bullying.

### Education

Opportunities to teach safeguarding, including online safety. Resources that could support schools and colleges include:

- Be Internet Legends developed by Parent Zone and Google is a free internet safety curriculum with PSHE accredited lesson plans and teaching resources for Key Stage 2 pupils
- Disrespectnobody is Home Office advice and includes resources on healthy relationships, including sexting and pornography
- Education for a connected world framework from the UK Council for Internet Safety supports the development of the curriculum and is of particular relevance to RSHE education and Computing. It is designed, however, to be usable across the curriculum and beyond (covering early years through to age 18) and to be central to a whole school or college approach to safeguarding and online safety.
- PSHE association provides guidance to schools on developing their PSHE curriculum
- Teaching online safety in school is departmental guidance outlining how schools can ensure their pupils understand how to stay safe and behave online as part of existing curriculum requirements
- Thinkuknow is the National Crime Agency/CEOPs education programme with age specific resources
- UK Safer Internet Centre developed guidance and resources that can help with the teaching of the online safety component of the Computing Curriculum.

### Protecting children

Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place.

Whilst considering their responsibility to safeguard and promote the welfare of children, and provide them with a safe environment in which to learn, governing bodies and proprietors

should consider the age range of their pupils, the number of pupils, how often they access the IT system and the proportionality of costs vs risks.

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty. The UK Safer Internet Centre has published guidance as to what “appropriate” filtering and monitoring might look like: UK Safer Internet Centre: appropriate filtering and monitoring.

Guidance on e-security is available from the National Education Network. Support for schools is available via the: schools' buying strategy with specific advice on procurement here: buying for schools.

Whilst filtering and monitoring is an important part of the online safety picture for schools and colleges to consider, it is only one part. Governors and proprietors should consider a whole school or college approach to online safety. This will include a clear policy on the use of mobile technology in the school or college. Many children have unlimited and unrestricted access to the internet via 3G, 4G and 5G in particular and the school and college should carefully consider how this is managed on their premises.

Whilst it is essential that governing bodies and proprietors ensure that appropriate filters and monitoring systems are in place, they should be careful that “over blocking” does not lead to unreasonable restrictions as to what children can be taught with regard to online teaching and safeguarding.

The Prevent duty Departmental advice for schools and childcare providers and Prevent Duty Guidance For Further Education Institutions

#### Reviewing online safety

Technology in this area evolves and changes rapidly. A free online safety self-review tool for schools can be found via the 360 safe website. UKCIS has published Online safety in schools and colleges: Questions for the governing board to help responsible bodies assure themselves that their online safety arraignments are effective.

#### Education at home

Where children are being asked to learn online at home the department has provided advice to support schools and colleges do so safely: safeguarding-in-schools-colleges-and-other-providers and safeguarding-and-remote-education

#### Staff training

Governors and proprietors should ensure that, as part of the requirement for staff to undergo regularly updated safeguarding training and the requirement to ensure children are taught about safeguarding, including online safety, that online safety training for staff is integrated, aligned and considered as part of the overarching safeguarding approach.

#### Information and support

There is a wealth of information available to support schools, colleges and parents/carers to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

#### Advice for governing bodies/proprietors and senior leaders

- Childnet provide guidance for schools on cyberbullying
- Educateagainsthate provides practical advice and support on protecting children from extremism and radicalisation
- London Grid for Learning provides advice on all aspects of a school or college’s online safety arrangements
- NSPCC provides advice on all aspects of a school or college’s online safety arrangements

- Safer recruitment consortium “guidance for safe working practice”, which may help ensure staff behaviour policies are robust and effective
- Searching screening and confiscation is departmental advice for schools on searching children and confiscating items such as mobile phones
- South West Grid for Learning provides advice on all aspects of a school or college’s online safety arrangements
- Use of social media for online radicalisation - A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
- UK Council for Internet Safety have provided advice on sexting-in-schools-and-colleges and using-external-visitors-to-support-online-safety-education

Remote education, virtual lessons and live streaming • Case studies on remote education practice are available for schools to learn from each other

- Departmental guidance on safeguarding and remote education including planning remote education strategies and teaching remotely
- London Grid for Learning guidance, including platform specific advice
- National cyber security centre guidance on choosing, configuring and deploying video conferencing
- National cyber security centre guidance on how to set up and use video conferencing
- UK Safer Internet Centre guidance on safe remote learning

Support for children

- Childline for free and confidential advice
- UK Safer Internet Centre to report and remove harmful online content
- CEOP for advice on making a report about online abuse

Parental support

- Childnet offers a toolkit to support parents and carers of children of any age to start discussions about their online life, to set boundaries around online behaviour and technology use, and to find out where to get more help and support
- Commonsensemedia provide independent reviews, age ratings, & other information about all types of media for children and their parents
- Government advice about protecting children from specific online harms such as child sexual abuse, sexting, and cyberbullying
- Government advice about security and privacy settings, blocking unsuitable content, and parental controls
- Internet Matters provide age-specific online safety checklists, guides on how to set parental controls on a range of devices, and a host of practical tips to help children get the most out of their digital world
- Let’s Talk About It provides advice for parents and carers to keep children safe from online radicalisation
- London Grid for Learning provides support for parents and carers to keep their children safe online, including tips to keep primary aged children safe online
- Lucy Faithfull Foundation StopItNow resource can be used by parents and carers who are concerned about someone’s behaviour, including children who may be displaying concerning sexual behaviour (not just about online)
- National Crime Agency/CEOP Thinkuknow provides support for parents and carers to keep their children safe online
- Net-aware provides support for parents and carers from the NSPCC and O2, including a guide to social networks, apps and games
- Parentzone provides help for parents and carers on how to keep their children safe online

- Parent info from Parentzone and the National Crime Agency provides support and guidance for parents from leading experts and organisations
- UK Safer Internet Centre provide tips, advice, guides and other resources to help keep children safe online

## **APPENDIX 1**

### **Safer Recruitment and DBS checks – policy and procedures**

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below. The SCR will be monitored and checked by the DSL/HT/Safeguarding Governor on a regular basis, throughout the academic year: Example half termly

#### **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.
- Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: [Disqualification under the Childcare Act 2006 \(August 2018\)](#).

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.

**Regulated activity** means a person who will be:

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

### **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.

### **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
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

### **Governance**

- All members of the governance will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity

