The Sunflower Federation

Child Protection Policy

FGB 24th September 2025

(Due to be reviewed September 2026)

Emma Gritten _____

Chair of Governors

Merja Paakkonen _____

Head teacher

The Sunflower Federation Child Protection Policy is in line with the quality and standards expected from Hertfordshire Safeguarding Children Partnership (HSCP) and will be monitored by the Governing Body. This policy will also be reviewed annually or when new legislation requires changes, whichever is the soonest. This policy is approved by the Governing Body.

Contents

1. Safeguarding Policy Statement 3
2. Important Safeguarding Contacts 3
3. Legislation and Guidance 5
4. Definitions: Safeguarding and Child Protection 6
5. Equality Statement, Children with Protected Characteristics 9
6. Roles and Responsibilities of Staff including Leadership and Management 3
7. Family Help 9
8. Confidentiality and Sharing Information 11
9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns) 13
10. Online Safety and Filtering 27
11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers, and contractors 28
12. Record Keeping 37
13. Safeguarding Training and Development 38
14. Quality Assurance, Improvement and Practice 39
15. Additional Associated Safeguarding Policies and Procedures 39

1. Safeguarding Policy Statement

A whole-school, child-centred approach is fundamental to all aspects of everyday life at The Sunflower Federation we strive to create a culture which enables children to express their wishes and feelings and feel able to talk to staff about anything that is importance to them. We believe that every child deserves to receive an education within an environment where they feel safe to learn and develop. We want our pupils, staff, parents, and carers to have the confidence and trust in our aspirations and goals and to know that collaborative working together is fundamental to creating and maintaining a shared approach to safeguarding.

This means we ensure that the welfare of a child or young person is paramount and keeping them at the centre in our decision making when working with them, their families, and those supporting them.

This policy outlines our whole school approach and commitment to our legal duties and responsibilities to safeguard all children and young people up to the age of 18. It applies to all staff and volunteers, including agency staff and contactors.

These duties are set out in the Children Act (1989, 2004) and Working Together to Safeguard Children (2023). We are committed to providing support and help as soon as possible, underpinned by our values that children are best looked after within their families and support networks. We are also committed to working with other agencies, including the Local Authority, to strengthen opportunities to access support when we consider that a child and their family could benefit from early help or, if a child is at risk or potentially at risk of significant harm.

We hope that parents and carers will support us to undertake our statutory duties to offer early help support and share information with other agencies where necessary. We want to work in collaboration with parents and carers to promote the health and welfare of all our pupils. We know that when children feel safe they are free to learn and develop.

2. Important Safeguarding Contacts

School's In-House Contacts

Organisation / Role	Name	Contact details
Designated Safeguarding Lead (DSL)	Darren White	darren.white@breakspeare.herts.sch.uk 01923 263645
Deputy Designated Safeguarding Lead (DDSL)	Merja Paakkonen	merja.paakkonen@breakspeare.herts.sch.uk 01923 263645
Deputy Designated Safeguarding Lead (DDSL)	Liz Chard	lizchard@meadowwood.herts.sch.uk 0208 4204720
Deputy Designated Safeguarding Lead (DDSL)	Gillian Ellis	gillian.ellis@breakspeare.herts.sch.uk 01923 263645
Deputy Designated Safeguarding Lead (DDSL)	Pauline Atkins	pauline.atkins@breakspeare.herts.sch.uk 01923 381034
Deputy Designated Safeguarding Lead (DDSL)	Sarah Cauldwell	sarahcaudwell@meadowwood.herts.sch.uk 0208 4204720

Deputy Designated Safeguarding Lead (DDSL)	Frankie Fry	**frankie.fry@breakspeare.herts.sch.uk** 0208 4204720
Designated Teacher for Children Looked After (DT for CLA)	Darren White	**darren.white@breakspeare.herts.sch.uk** 01923 263645
Special Educational Needs Coordinator (SENCO)		
Mental Health Lead	Liz Chard	**lizchard@meadowwood.herts.sch.uk** 0208 4204720
DSL Prevent Lead	Merja Paakkonen	**merja.paakkonen@breakspeare.herts.sch.uk** 01923 263645
Chair of Governors	Emma Gritten	**emmagritten@meadowwood.herts.sch.uk**
Vice Chair of Governors	Narinder Sian	**narindersian@meadowwood.herts.sch.uk**
Link Governor for Safeguarding	Jane Rogers	**jane.rogers@meadowwood.herts.sch.uk**

Non School Contacts

Organisation / Role	Name	Contact details
Local Authority Designated Officer (LADO)	Duty LADO	*Strictly for professionals use only*
Hertfordshire County Council Children's Social Care	Customer Service Centre	Children's Social Care Report concerns about a child or request support | Hertfordshire County Council Children's Services Out of Hours Service (SOOHS) 0300 123 4043
Family Help and Support	Families First website, information for parents, carers, and professionals. Professionals can access support from Families First Coordinators when supporting a family with an FFA or other targeted and intensive support.	Families First (hertfordshire.gov.uk)
Prevent	Prevent referrals Parent guidance	https://thegrid.org.uk/assets/prevent-national-referral-form 2025.pdf Parents' Booklet (educateagainsthate.com)

	Advice line for members of the public Channel helpline	ACT Early | Prevent radicalisation 0800 011 3764 020 7340 7264
NSPCC Helpline	Helpline Email	0808 800 5000 help@NSPCC.org.uk
Police	Telephone	Emergency 999, non-emergency 101

3. Legislation and Guidance

Section 175 of the Education Act 2002 places a duty on schools and Local Authorities to safeguard and promote the welfare of pupils.

All education settings include:

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

Serious Crime Act 2015, Female Genital Mutilation Act 2003 - 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

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

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

The Human Rights Act 1998 - explains that being subjected to harassment, violence, and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the European Convention on Human Rights - ECHR Official Texts - ECHR - ECHR / CEDH

The Equality Act 2010 - makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting pupils regarding these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it is proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there is evidence that they are being disproportionately subjected to sexual violence or harassment

The Public Sector Equality Duty (PSED) | EHRC - explains that we must have due regard to eliminating unlawful discrimination, harassment, and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

This Child Protection policy is based on the Department for Education's (DfE's) statutory guidance.

Keeping Children Safe in Education (KCSiE) - sets out the legal duties that all schools and colleges in England must follow to safeguard and promote the welfare of children under the age of 18.

Working Together to Safeguard Children - is DfE guidance outlining what organisations and agencies must and should do to help, protect, and promote the welfare of all children and young people under the age of 18 in England.

Statutory guidance on the Prevent duty, Prevent duty guidance: England and Wales (2023) - all schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism".

Multi-agency statutory guidance on Female Genital Mutilation - sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.

The School Staffing (England) Regulations 2009 - sets out what must be recorded on the Single Central Record and the requirement for at least one person conducting an interview to be trained in Safer Recruitment techniques.

Hertfordshire Safeguarding Children Partnership (HSCP) - the three statutory partners (Hertfordshire County Council, Police and Health) have a joint and equal duty to ensure multi-agency safeguarding arrangements are in place at a local level, and that organisations and agencies are clear about how they will work together to safeguard children and promote the welfare of children.

Resolution of Professional Differences including Escalations - effective partnership working is key to keeping children and young people safe from harm. HSCP encourages constructive challenge as part of our culture of learning and partnership working. In May 2025, the HSCP published this revised policy for resolutions and escalations.

Specific guidance for Schools/Education - schools and educational institutions play a critical role in safeguarding children and young people. It is essential that they adhere to the established resolution process to ensure timely and effective resolution of professional differences.

Information sharing advice for safeguarding practitioners - produced by the DfE, outlines the importance of sharing information about children, young people, and their families in order to safeguard children. It provides clarity on when and how information can be shared legally and professionally to achieve improved outcomes.

Maintained schools' governance guide - 7. Compliance - provides guidance for governing bodies on how to meet their legal and regulatory responsibilities with regards to compliance. It covers various aspects of compliance, including education, funding and finances, health and safety, inspections, political impartiality, protecting and sharing information, safeguarding and pupil welfare, pupil behaviour, school admissions, school attendance, schools causing concern, school complaints, length of school day and year, opening, closing or making organisation changes to a school, managing school premises, control and community use of school premises, school uniform, staffing and performance management, and whistleblowing.

Early Years providers add:

This policy also meets requirements relating to safeguarding and welfare in the EYFS statutory framework for group and school-based providers.

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as the "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

4. Definitions: Safeguarding and Child Protection

All staff at The Sunflower Federation are required read our school's policies and procedures as part of their role so that they can keep our children safe and promote their wellbeing at all times.

Safeguarding is defined as:

- Providing help and support to meet the needs of children as soon as problems emerge
- Protecting children from maltreatment, whether that is within or outside the home, including online
- Preventing impairment of children's mental and physical health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes.

Working Together to Safeguard Children further extends this definition to include:

- Promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- Taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework.

Child/ren: The legal definition of a child in the UK includes everyone under the age of 18.

'Early Help' is a term used in Hertfordshire that refers to a wide range of interventions offered by various organisations and partner agencies, as well as services within the County Council and beyond. The primary early help service in Hertfordshire is known as "Families First" which is in place to help professionals and families find early help and information as soon as problems emerge to prevent issues from getting worse. Support and interventions under the Families First umbrella can help coordinate additional support to that which is available from a family's usual support network as well as more targeted and short pieces of interventions.

Families First Assessments (FFA) are used by practitioners who work with children, young people, parents, and carers where it is considered that the child/family would benefit from early help support. It is used to identify needs, and to organise the right support and services to address those needs at an early stage. The FFA process allows different agencies and services to share information and work together in a coordinated way.

For families with children under 18 (25 if they have a learning need or disability), Families First can help with issues such as parenting, mental and physical health problems, drug or alcohol dependency, domestic abuse, school-related concerns, debt problems, and risk of becoming homeless.

The Continuum of Need guidance aims to ensure that support in Hertfordshire is offered at the earliest opportunity, with an approach that enables us to work effectively alongside families. The Continuum of Need is a threshold document that supports everyone working with Hertfordshire's children and families to identify the "Level of Need" and the service responses that can be expected. It sets out how we can work together, by placing the child and family at the centre, sharing information, and working with families to help them to find solutions early to prevent their difficulties from escalating. It is not intended to be a prescriptive guide and does not replace professional judgement.

Child in Need: Under the Children Act 1989, local authorities are under a general duty to provide services for children in need for the purposes of safeguarding and promoting their welfare. A Child in Need is defined under Section 17 of the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired without the provision of services, or a child who is disabled. To fulfil this duty, practitioners undertake assessments of the needs of individual children, giving due regard to a child's age and understanding when determining what, if any, services to provide.

Child Protection: Under Section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child who lives or is found in their area is suffering or is likely to suffer significant harm, it has a duty to make such enquiries as it considers necessary to decide whether to take any action to safeguard or promote the child's welfare. Such enquiries, supported by other organisations and agencies as appropriate, should be initiated where there are concerns about all forms of abuse, neglect, and exploitation whether this is taking place in person or online, inside, or outside of the child's home. There may be a need for immediate protection whilst an

assessment or enquiries are carried out. Schools are required to cooperate with children's social care when carrying their inquiries and therefore we have a duty to share information when requested to do so.

Significant Harm is the threshold for a child protection response to support and or protect children. Harm is defined in the Children Act 1989 as the ill-treatment of a child or the impairment of their health or development. This can include harm caused by seeing someone else being mistreated, for example by witnessing domestic abuse. The phrase 'significant harm' was introduced by the Children Act 1989. The Act does not define 'significant.' The question of whether or not harm is 'significant' relates to its impact on a child's health or development.

The Gateway is the 'front door' to Hertfordshire's social care. The Gateway Service receives contacts and queries via calls or emails.

Contact - A 'Contact' is where a member of the public or a professional makes contact with Children's Services about a child who may be a child in need of support or protection, and where there is a request for information or a service.

Referrer - The 'Referrer' is the member of the public or professional making contact with Children's Services.

Referral - For this procedure, a 'Referral' is a possible outcome of a Contact, where a social worker or manager considers a statutory response may be required. In some instances, it may be identified that a child may be better supported via other services such as Early Help or Universal Services (e.g. health, schools, family centres, etc.).

The Gateway operates to the principle that every family (child and their parent/carer) has the right:

- To be told when a professional is worried about the safety or wellbeing of their child *by that professional*
- To have their consent obtained when someone wishes to make a request for support on their behalf
- To be front and centre of the plan to keep their child safe and well.

Multi Agency Safeguarding Hub (MASH) is co-located, within the Gateway. It is a partnership comprising of colleagues from Children's Services, Health, Police, and Probation; advisory support is provided by Independent Domestic Violence Advocates and satellite partners. These agencies work together to improve the quality of the information sharing process when identifying the needs and risks of children and their families. They make decisions at the earliest opportunity and make recommendations about what services and resources the child and family may benefit from.

Although all contacts being assessed by MASH or early help services are important, it is less likely that they will meet the threshold for Child Protection (significant harm).

Abuse is all forms of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm. Children may be abused in a family, in an institutional or community setting, by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children maybe abused by an adult or adults or by another child or children.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Section 9 provides the full definition.

Exploitation is a risk to children and young people that takes place outside of 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 abuse (including harassment and exploitation), domestic

abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines and radicalisation.

NB the terms abuse, neglect, and exploitation, and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap.

Children Looked After: A child is 'looked after' (in care) if they are in the care of the Local Authority for more than 24 hours. Children can be in care by agreement with parents or by order of a court. The placement providing the care can be a connected person to the child or a Local Authority approved foster carer.

Kinship Care refers to a type of care where a child who cannot be looked after by their birth parents is cared for by relatives or friends. The government in England has launched a Championing kinship care: the national kinship care strategy to improve kinship carers' financial stability, education, training, and partnership with local authorities and other agencies.

Legal Care Arrangements:

- Informal Kinship Care
- Special Guardianship Order (SGO)
- Child Arrangements Order (CAO)
- Kinship Foster Care
- Private Fostering
- Adoption by a Family Member or Friend

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

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

5. Equality Statement, Children with Protected Characteristics

Some children are at greater risk of harm, both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it. At the Sunflower Federation we are committed to anti-discriminatory practice and ensuring that all children are provided with the same protection regardless of any additional needs, barriers, or protected characteristics they may have. As stated in the Equality Act 2010, we recognise the protected characteristics that may be applicable to our pupils:

Age

Disability

Gender reassignment

Marriage and civil partnership

Pregnancy and maternity

Race

Religion or belief

Sex

Sexual orientation.

All staff and volunteers understand the importance of recognising that a child may benefit from Early Help intervention, and it is integral to our whole school approach to look and listen out particularly for children:

is disabled or has certain health conditions and has specific additional needs

- has special educational needs (whether or not they have a statutory Education, Health, and Care plan)
- has a mental health need
- is a young carer
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines
- is frequently missing/goes missing from education, home, or care
- has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit
- is at risk of modern slavery, trafficking, sexual and/or criminal exploitation
- is at risk of being radicalised or exploited
- has a parent or carer in custody, or is affected by parental offending
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- is misusing alcohol and other drugs themselves
- is at risk of so-called 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage
- is a privately fostered child.

Children with Special Educational Needs and Disabilities (SEND)

We know who our pupils are whom have special educational needs, disabilities, or additional health needs, we also recognise that they may face additional barriers, that can include:

- assumptions that indicators of possible abuse, such as behaviour, mood, and injury, relate to the child's impairment without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- assumptions that children with SEND can be disproportionally impacted by things like bullying - without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.
- reluctance to challenge carers (professionals may over-empathise with carers because of the perceived stress of caring for a disabled child)
- disabled children often rely on a wide network of carers to meet their basic needs and therefore the potential risk of exposure to abusive behaviour can be increased
- a disabled child's understanding of abuse
- lack of choice/participation.

Children Looked After (CLA)

The most common reason for a child to become looked after is as a result of abuse and/or neglect. We therefore ensure that the appropriate arrangements are in place to support these children and keep them safe from further harm. This includes:

- appointment of a Designated Teacher (DT) for CLA
- appropriate staff made aware of a child's looked after status
- ensure that necessary staff have the skills, knowledge and understanding of the child's needs
- ensure the child's record contains a clear understanding of their legal status and care arrangements, including the levels of authority delegated to their carer and contact arrangements with birth parents or those with parental responsibility
- keep contact details of the child's social worker, carer(s) and name and contact details of the virtual school head for DT to liaise with.

Children with a Social Worker (CWASW)

Virtual School Heads have a responsibility for the strategic oversight of the educational attendance, attainment, and progress of:

- **children looked-after**,
- **children previously looked-after**; and
- **children with a social worker** – defined as any child who has been assessed as being in need under section 17 of the Children Act 1989 and currently has a social worker; it also includes those who have been assessed as needing, or previously needing, a social worker within the past 6 years due to safeguarding or welfare reasons.

In line with Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK this has been extended to include:

- **children who have previously had a social worker** – the cohort of children with a social worker and those who have previously had a social worker who are aged from 0 to 18; and
- **children in kinship care arrangements** - this means any friend or family member, who is not a child's parent but raising them for a significant amount of the time, either as a temporary or permanent arrangement.
- **Children who are in Elective Home Education (EHE)**
- **Children Missing from Education (CME)**

In offering advice and information to workforces that have relationships with children with social workers, virtual school heads identify and engage with all key professionals in Hertfordshire and beyond, helping them to understand the role they have in improving outcomes for CWASW e.g. DSL and deputies, social workers, headteachers, governors, special educational needs co-ordinators, mental health leads, other Local Authority partners, including Designated Social Care Officers for SEND.

The Sunflower Federation ensures that our Designated Teacher has the appropriate training, so they are able to take the leadership of this crucial area of our safeguarding arrangements in collaboration with our Designated Safeguarding Lead which includes:

- working closely with virtual school heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans

- collaborating with the virtual school heads to also promote the educational achievement of previously looked after children.

6. Roles and Responsibilities of Staff including Leadership and Management

Role and Responsibilities of the Whole School

Safeguarding is **everyone's** responsibility at The Sunflower Federation. This policy applies to all of our staff including permanent, temporary and supply, volunteers, governors, and contractors. It also applies to our safeguarding arrangements for extended school and off-site activities.

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

- Behaviour Policy
- pastoral support system
- planned programme of relationships, sex, and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - healthy and respectful relationships
    - boundaries and consent
    - stereotyping, prejudice, and equality
    - body confidence and self-esteem
    - how to recognise an abusive relationship (including coercive and controlling behaviour)
    - the concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and FGM and how to access support
    - what constitutes sexual harassment and sexual violence and why they are always unacceptable.

Role and Responsibility of all staff (permanent, temporary and supply), volunteers and contractors

All staff will be required to:

- Read Part One and Annex B of Keeping Children Safe in Education, and the reviewed version of this guidance at least annually. Staff/volunteers who do not work directly with children are not required to read Part One and can be provided with Annex A (a condensed version of Part One) but to promote good practice we recommend that they do so.

  Translated versions of Part One Keeping Children Safe in Education can be found at Keeping Children Safe in Education Part 1 Translations | LGFL for staff, volunteers, parents and carers whose first language may not be English, should they wish to use this.
- Read Annex B of Keeping Children Safe in Education which outlines important additional information about specific forms of abuse and safeguarding issues to ensure we have a culture that recognises that children within the specific circumstances can be at greater

risk of abuse, neglect and exploitation, and a working knowledge to identify indicators. As good practice, we ask staff who do not directly work with children to also read this chapter.

- Sign to confirm that they have read the expected sections according to their role, have understood the content and their roles and responsibilities in our whole school approach to safeguarding.
- Promote and raise awareness about the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online).
- Contribute to creating a culture for pupils who are lesbian, gay, bisexual, or gender questioning to speak out and share their concerns.
- Contribute to creating a culture for any child defined as having a protected characteristic to speak out and share their concerns (see Section 5).

All staff will be aware of:

Our school's safeguarding arrangements and systems which is explained to staff as part of their induction and annual update training. As part of staff induction new staff/volunteers are provided with the following key guidance and information provided by our school senior leadership team:

- Child Protection Policy
- Staff Behaviour Policy/Code of Conduct
- the role and identity of the Designated Safeguarding Lead (DSL) and deputies
- the Behaviour Policy
- Online Safety Policy

- Our expected safeguarding response to children who are absent from education, particularly on repeat occasions and/or prolonged periods.
- Signs of vulnerabilities to look out for in children who may benefit from Early Help support, we explain to staff the Early Help process for children and their families and what their role is in this to support DSLs in ensuring children and their families receive support as soon as problems emerge.
- The importance of Early Help assessments and how they can help identify emerging difficulties and therefore how sharing information, including with other practitioners, can support early identification and assessment.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The process for recording and sharing information internally to DSLs and on children's safeguarding records.
- The process of making referrals to the Local Authority Children's Social Care and/or Police where required and the statutory processes that may follow.
- The signs of specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or

involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines) See Annex B *Keeping Children Safe in Education.*

- How to support and speak to children when they may share their worries or make disclosures of abuse, neglect or exploitation and contribute to creating a culture where children feel able to speak with the relevant safeguarding leads.
- The importance of reassuring children that they are being taken seriously and that they will be supported and kept safe.
- The importance of supporting families and providing a culture of support to encourage parents/carers to seek support and engage with our school and professionals when issues emerge or become a concern.
- Children can be at risk of harm inside the home (familial harm) and outside of their home (extra familial harms) and that any form of harm can happen directly or online.
- Children who are (or who are perceived to be) lesbian, gay, bisexual or gender questioning can be targeted by other children.
- What to look for to identify children who need help or protection in accordance with statutory procures under the children act section 17 (child in need) and section 47 (significant harm).

Role and Responsibilities of the Designated Safeguarding Lead (DSL)

Our DSL team includes a members of our senior leadership team. We also have Deputy DSLs (DDSL) within our staffing group. Whilst one of the DSLs is referred to the 'lead' and will coordinate the DSL team, they are all trained at the same level to ensure that at all times one or more of them are available to carry out all of their designated functions in safeguarding.

The DSL takes lead responsibility for our school's child protection and wider safeguarding arrangements. This includes online safety and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

Whilst all of our staff are part of our safeguarding culture, it is the role of our DSL to receive information, review and make decisions about any necessary further considerations or actions needed to respond to any safeguarding matters that arise.

The DSL will act as the main contact in our school when a child and their family are receiving support from the school, external agencies, and statutory services.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Please note that DSLs can work outside of these hours when matters of support or a child protection matter arises.

In the event that non-urgent matters arise out of school hours, our DSL can be contacted, if necessary by contacting **darren.white@breakspeare.herts.sch.uk**

When the DSL is absent, please contact the school's Deputy DSLs. Please refer to the names and contacts noted in the table at the top of the policy. Please refer to the posters and information that are visible throughout the school.

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

- Provide advice and support to other staff on child welfare and child protection matters.
- Take part in and/or lead early help support which may include a Families First Assessment and thereafter attend/chair Team Around the Child meetings.

- Take part in strategy discussions organised by the Local Authority's Children's Social Care and inter-agency meetings and/or support other staff to do so when required.
- Contribute to the assessment of children (when a child may have suffered harm or is at risk of harm).
- Refer suspected cases, as appropriate, to the relevant body (Local Authority Children's Social Care, Channel Programme, Disclosure and Barring Service, and/or Police), and support staff who make such referrals directly.
- Have a good understanding of behaviours that may impact on a child's engagement and learning that may require consideration through safety/support planning, this includes the impact on themselves but also to other children.
- Have a good understanding of harmful behaviours that may require risk management, safety planning and/or support in school, this includes those presented by children within the setting, their parents/carer, or associated adults where necessary.
- Have a good understanding of the filtering and monitoring systems and processes in place at our school.
- Assist the Headteacher/Principal to review and respond to low-level concerns that may arise regarding staff.
- Share information and/or take part in statutory processes that involve reviewing and analysing of safeguarding practice and policies. This can include meetings held by Hertfordshire Safeguarding Children's Partnership in response to significant safeguarding incidences, child death and/or where a safeguarding practice review is required to determine learning and practice analysis.

The DSL will also:

- Keep the Headteacher informed of any issues, the conversations with children and their families, universal services and referrals to external agencies and statutory services.
- Liaise with universal, targeted, and statutory agencies, Local Authority workers (Children's Services and other key practitioners) when there are safeguarding concerns as appropriate (includes early help and child protection).
- Share information about incidences of sexual violence and sexual harassment with statutory colleagues such as Police and Children's Social Care colleagues in order to prepare and implement the school's policies.
- Be confident about what local specialist support that is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment.
- Be aware that children are entitled to have an 'Appropriate Adult' to support and help them in Police investigations or if there is threshold met for them to be searched.

The full responsibilities of the DSL and deputy(s) are set out in their job description, see Annex C KCSiE

Role and Responsibilities of the Governance

Our Governing Body have a strategic role within our leadership and management team and must ensure that all staff comply with legislation and local guidance at all times.

The Governing Body/Trustee Board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development for the setting.
- Evaluate and approve this child protection policy along with other policies related to safeguarding at each review, ensuring they comply with the law, and hold the Headteacher/Principal to account for their implementation.
- Evaluate and approve recommendations/action plans identified through quality assurance activity that the Headteacher/DSL undertakes to review safeguarding practice through audits and annual/termly governing reports to ensure that they have regular oversight and hold the Headteacher/Principal accountable for the practice improvement.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a senior body level (or equivalent) lead (or link governor) to monitor the effectiveness of the school's safeguarding arrangements including policies and their implementation, in conjunction with the full governing body. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety according to their roles, and that such training is regularly updated and is in line with statutory guidance and Hertfordshire Safeguarding Children's Partnership.
- Ensure that all governors/trustees:
    - Read Keeping Children Safe in Education in its entirety, and review compliance of this task at least annually.
    - Sign a declaration at the beginning of each academic year to say that they have reviewed the above guidance (bottom of this policy). *Please note that you are only required to sign the copy in Appendix 2 of this policy if you are not able to access the copy provided by Herts for Learning Education, that is located on the Governor Hub.*
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
    - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training.
    - Reviewing the DfE's filtering and monitoring standards and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards.

The Governing Body will make sure:

- The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources, and support.
- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety and understanding the filtering and monitoring systems and processes in place.

- The school has effective procedures to manage any safeguarding concerns (no matter how small) that arise. This includes those related to child welfare concerns, low level concerns and allegations made against staff.
- That this policy reflects those children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.
- Where another body is providing services or activities on the school site (regardless of whether or not the children who attend these services/activities are children on the school roll):
    - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
    - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate.
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.
- The Chair of Governors will act as the 'case manager' in the event that an allegation is made against the Headteacher. where appropriate (see Section 11 Managing Concerns and Allegations)

Section 14 (Training) of this policy has information on how governors are supported to fulfil their role, also see Part two KCSiE 2025.

Role and Responsibilities of the Headteacher/Principal

The Headteacher/Principal will:

- Implement this policy and ensure that all staff:
    - Are informed of our school's systems which support safeguarding, including reading and understanding this policy, as part of their induction.
    - Follow the procedures included in this policy, what they should know and do in relation to information sharing and referrals of cases of suspected abuse and neglect.
- Make this policy available to parents/carers, professionals, and the community to ensure there is transparency and clear expectations about the school's duty to safeguarding and promote the welfare of children and the arrangements for responding to children presenting with needs that may require early help or support to protect them. A copy is found on the school website.
- Ensure the DSL has appropriate time, funding, training, and resources, and that there is always adequate cover if the DSL is absent.
- Act as the 'case manager' representing the school in the event of an allegation of abuse made against another member of staff or volunteer.
- Manage cases where there are low-level concerns regarding the conduct of staff or oversee delegation to the DSL.
- Ensure the relevant staffing ratios are met, where applicable.
- Make sure each child in the Early Years Foundation Stage is assigned a key person.
- Oversee the safe use of technology, mobile phones and cameras in Early Years setting

Role and Responsibilities of the Designated Teacher

Our Designated Teacher takes leadership of promoting the educational attainment of Children with a Social Worker which includes:

- Working closely with Virtual School Heads to ensure that funding is best used to support the child's educational achievement and development needs that are identified in their personal education plans.
- Carrying out their duties in line with Designated teacher for looked-after and previously looked-after children - GOV.UK (www.gov.uk) and extended duties as outlined Promoting the education of children with a social worker and children in kinship care arrangements: virtual school head role extension - GOV.UK (www.gov.uk).
- Working closely with our DSL for those children who are supported by a Child in Need or Child Protection Plan to ensure support for the education attainment of these children is appropriately entwinned with safeguarding processes.

All staff and leadership are required to support HSCP principals to safeguarding children by exercising their professional curiosity at all times. April 2025 Professional Curiosity

7. Family Help

Keeping children safe, helping families thrive - GOV.UK underpins the Children and Wellbeing bill which is a key step towards delivering the government's 'Opportunity Mission' to break the link between young people's background and their future success. It will better put in place support to drive high and rising standards throughout our education and care systems so that every child can achieve and thrive. It outlines the government's commitment to keeping families together and children safe and support children to live in family settings where children cannot remain at home, including through kinship or foster care, rather than residential care.

In March 2025 the DfE published The Families First Partnership (FFP) Programme Guide this sets out how every child is to be kept safe and have the opportunity to succeed, children's social care is to be reformed and committed to supporting every child to grow up in a safe, stable and loving home, for most children this means growing up within their family and support through early help and family networks.

Family Help will take place at the heart of communities, bringing together local services under a combined, multi-disciplinary practice approach and service offer. The key principles that will inform the delivery of services will include:

• wrapping support around the whole-family at the earliest opportunity – using the expertise of multi-disciplinary practitioners;

• ensuring consistency of relationships between children, families, and their lead practitioner;

• adopting one plan that will stay with families but adapt as needs change.

At The Sunflower Federation we endorse these principles and will continue to work in partnership and collaboration with children and their families so that they are supported from an early stage by being a part of and leading the conversations about change and aims for their children. We are keen to support families in a strength and solution-based approach, encouraging motivation and confidence to improve their own agency to make safe and positive decisions for themselves and their children.

Our principles include, but are not limited to:

- Approaching families and their wider family networks and communities with empathy, respect, compassion, and creativity.
- Avoiding reinforcing family shame, suffering, and blame.

- Making efforts to understand the impact of the parental trauma influencing the dynamics and experiences of the family.
- Using strength-based approaches, working with parents and carers to identify what is working well and how their strengths could support them to effect positive change.
- Ensuring we work sensitively with parents, carers, and children, to identify and understand the impact of adversity and trauma in their lives; seeking to understand how adversity and trauma might manifest and affect children and parent's engagement and use their expertise to adapt their response with care and compassion.
- Adapting our responses to meet the diverse needs of parents and carers, including fathers and male carers, and the specific challenges being faced, including parents and carers of disabled children, and where harm is outside the home.
- Ensuring we understand the family's background, ethnicity, religion, financial situation, ability, education, sex, ages and sexual orientation, and potential barriers these create in seeking and accessing help and support.
- Being alert and recognising where parents or carers may not be acting in the best interest of the child or where children may be experiencing abuse, neglect, and exploitation as a result of actions by parents, carers, or other individuals in their lives. Practitioners use their skills and expertise to adapt their response to secure engagement.
- Being mindful of negative stereotypes when making decisions which might lead to false and unconscious bias.

Communicating effectively verbally and non-verbally by:

- Communicating with respect, being clear, curious, and inclusive; adapting to parent's and carer's needs.
- Providing materials to children, parents, carers, and families which are jargon free, developmentally appropriate and in a format that is easily understood.
- Ensuring any materials, such as minutes or reports, capture the school's contribution but also those from the children, parents and carers which must include their views and wishes.
- Supporting families to access support to translate information where English is not their first language. Our school will access interpreters where needed including British Sign Language.

Empowering our parents and carers to participate in decision-making to help, support and protect children by:

- Creating a safe culture which is an open and accepting forum free from discriminatory or prejudicial judgements.
- Ensuring the open culture is one which still provides reflection and challenge where the information has the potential to be a risk or influencing factor which may impact on a child's safety and wellbeing.
- Asking families for their perspective on a situation or issue that arises, ensuring we consider their point of view and factor this in when thinking about support.
- Promote families' rights to support through use of advocates, family members or a supporter.
- Ensuring parents and carers are fully aware of who will attend meetings and discussions, if the child will be invited to participate, and the format of the meeting or discussion.

- Giving parents and carers adequate preparation at every stage, relevant information, a safe and appropriate environment for participation, and suitable access arrangements.
- Signposting parents and carers to sources of help and support available locally or through the local authority.
- Provide opportunities for feedback and review to ensure acknowledgement of positive progress but also reviewing and discussion of any new or increasing issues to readapt a family's plans.
- Being transparent about our concerns and why we may need to request support from an outside agency; and the potential actions should our concerns increase for the children.
- Helping parents and carers to understand what the issues are and how these impact on the child, what decisions could be made, what changes need to be made, why and how, timescales and possible outcomes.
- Providing information about different types of support, what it involves and expects from parents and carers so they can make an informed choice and decision about which support pathways will be more helpful and effective for them.

8. Confidentiality and Sharing Information

Trusted relationships are at the heart of working with children and their families at The Sunflower Federation. We strive to uphold good practice and work in partnership with children and families, communicating effectively and listening well so that we have sufficient information to understand and be able to meet their needs.

An open culture is imperative when deciding whether to share information and it is important to get the lawful basis right. The legal framework can appear complex, and a lack of clarity can lead practitioners to assume, incorrectly, that no information can be shared because consent has not been provided. Our school understands the lawful basis in which our DSLs can share information with other people, agencies and organisations about the children and families we are supporting.

In line with our principles of working with families outlined above, we strive to be transparent, open, and clear when we need to discuss any information or concerns that worry us about a child's wellbeing. If we feel that we need to share information, we will explain how information will be shared or used so that families can make an informed choice about whether to consent.

If we feel that we need to share information with services due to concerns about a child's safety or welfare to provide the family with specific support, we will be transparent and honest about our concerns and the ways in which such services could help the family. We will endeavour to support and encourage the family to consent and engage with such support. We believe that this collaborative approach will support children to have the confidence to speak up and share their views as well as encouraging parents and carers of children at our school to have a willingness to engage with services that provide support.

If we have a concern about a child's safety and have decided to share information to protect them from a risk of harm, we will endeavour to gain cooperation and understanding from parents and carers. We will strive where possible to always gain consent and where we believe our concerns have increased and warrant the sharing of information to statutory services such as Police and Children's Social Care, we will have made efforts to discuss, explore and provide support to address these with families in a collaborative way beforehand; concerns should not be a surprise to families unless in situations where a one off or unprecedented incident occurs.

However, for a small number of children, seeking parental consent is not always possible and may place a child or others at risk of harm, for example:

- The child would be placed at increased risk of significant harm through the action of gaining this consent.

- There would be an impact on a criminal investigation.
- A delay in making the referral would impact on the immediate safety of the child.

In situations where our professional or legal duty is exercised to share certain information in the absence of consent, we will inform them as soon as possible if it is safe and appropriate to do so. We will be clear about what we have shared, with whom, the reasons why and how the information will be used.

In any situation where a child or their parent/carer object to consent or particular information sharing and we decide that it is proportionate to do so, a clear rationale, outlining our decisions and the reasons why, will be recorded on the child's file.

In addition to sharing information, our DSLs will endeavour to arrange a meeting with the parents and carers of all children to share information about the incident, plan safety strategies and/or risk management plans. Our DSLs will endeavour to keep families up to date and provide reassurance on any measures being taken, whilst respecting the privacy of each individual child involved.

The Data Protection Act (DPA) 2018 does not prevent or limit the sharing of information for the purposes of keeping children safe. The Sunflower Federation recognises that timely information sharing is essential for effective safeguarding. Whilst we promote collaboration and partnership with our families, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children when required.

The following principles apply to The Sunflower Federation confidentiality agreement:

- Timely information sharing is essential to effective safeguarding.
- The Data Protection Act (DPA) 2018 does not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - Even if a victim does not consent to sharing information, staff may still lawfully share it if there is another legal basis under the Data Protection Act that applies.
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children.
- The DSL should consider the following points:
    - Parents or carers should normally be informed (unless this would put the child at greater risk).
    - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to Children's Social Care where the child resides.
    - Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the Police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the Police remains.

- Regarding anonymity, all staff will:
  - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
  - Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
  - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
  - Have regard for the Government's publication Information sharing advice for safeguarding practitioners - GOV.UK (www.gov.uk) includes 7 'golden rules' for sharing information and will support staff who have to make decisions about sharing information with all relevant parties.

If staff are in any doubt about sharing information, they can seek advice from our Headteacher, DSL or any person in a position of senior leadership or wider DSL team.

9. Recognise and Respond to Abuse, Neglect and Exploitation (what all staff must know and do if they have concerns)

Abuse, Neglect and Exploitation

All our staff are aware of what Abuse, Neglect and Exploitation is and understand the different types of indicators as outlined in Appendix 3 which could suggest a child is suffering or likely to suffer harm.

We encourage our staff to be professionally curious about what to look out for as this is vital for the early identification of abuse, neglect, and exploitation so that we can identify children who may be in need of help or protection at the earliest opportunity.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse.

Our staff are aware that children may be abused by an adult or adults or by another child or children.

Physical Abuse - Physical abuse is a form of abuse which may involve:

- hitting
- shaking
- throwing
- poisoning
- burning or scalding
- drowning
- suffocating or otherwise causing physical harm to a child.

Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child (Fabricated Induced Illness FII).

Emotional Abuse - The persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve:

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

Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. It can be difficult to recognise emotional abuse, and children may not always realise they are experiencing it. However, there may be indicators in the way a child behaves and reacts to certain situations.

Sexual Abuse - Sexual Abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve:

- **Physical contact:** including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing
- **Non-contact activities:** such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse
- **Online abuse:** sexual abuse can take place online, and technology can be used to facilitate offline abuse.

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

Neglect - Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development.

Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing, and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate caregivers).

- Ensure access to appropriate medical care or treatment.

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

HSCP Neglect Tool

7 minute briefing Parental Neglect of Medical Needs

Exploitation

Exploitation in relation to children refers to the use of children for someone else's advantage, gratification, or profit often resulting in unjust, cruel, and harmful treatment of the child. These activities are to the detriment of the child's physical or mental health, education, moral, or social-emotional development. It covers situations of manipulation, misuse, abuse, victimisation, oppression, or ill-treatment.

Our staff are aware that there are several types of child exploitation, including, but not limited to:

- **Child Sexual Exploitation (CSE):** this is a type of sexual abuse where children are sexually exploited for money, power, or status. It can involve contact and non-contact activities and can occur without the child's immediate recognition; this is due to their grooming by the abuser.
- **Child Labour Exploitation:** This involves the use of children in work that is harmful to their physical and mental development. It deprives them of their childhood, potential, and dignity.
- **Child Trafficking:** children are recruited, moved, or transported and then exploited, forced to work, or sold. They are often used for forced labour, sexual exploitation, or illegal activities.
- **Child Criminal Exploitation (CCE):** this is where children are involved in activities of a criminal nature, often in gangs. They may be forced or manipulated into committing crimes, such as selling drugs or stealing.

Safeguarding Issues and Specific Forms of Abuse

All our staff understand that children can be at risk of abuse or exploitation in situations outside their families. They are aware that extra familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), drug taking and/or alcohol misuse, criminal exploitation, child sexual exploitation, serious youth violence, county lines, radicalisation, consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as youth produced sexual imagery) and can put children in danger.

Staff are aware that Extra Familial Harms can present online, in a child's environment/neighbourhood, school and any place/space that children occupy or access such as:

- Child abduction and community safety incidents
- Child Sexual Exploitation (CSE)
- Child Criminal Exploitation (CCE)
- Children and the Court system
- Children absent from education
- Children with family members in prison

- Cybercrime
- Domestic abuse
- Homelessness
- Mental health
- Modern Slavery and the National Referral Mechanism
- Preventing radicalization
- The Prevent Duty
- Channel
- Sexual violence and Sexual harassment between children in schools
- Serious Violence
- So-called 'honour'-based abuse (including female genital mutilation and forced marriage)
- FGM and the mandatory reporting duty for teachers
- Forced marriage.

Detailed information about what staff understand about these forms of abuse and safeguarding issues is outlined in Appendix 4.

Additional advice and support - There is a wealth of information and resources available in this chapter to support schools and colleges.

Child-on-Child Abuse

At The Sunflower Federation we know that children can cause harm to other children. As a school we have a zero acceptance of child-on-child abuse and create a culture of keeping an open mind and attitude that "it could happen here." Our staff are aware that even if no reports are being made in our school, it does not mean it is not happening.

Our staff understand that it is important to challenge inappropriate behaviours between children that are abusive in nature, and we have clear expectations that incidents are not downplayed or suggested to be jovial or part of growing up as this can lead to a culture of unacceptable behaviours and unsafe environments for children and young people.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between children (sometimes known as 'teenage relationship abuse').
- Physical abuse which can include hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- Sexual violence, such as rape, assault by penetration and sexual assault.
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type of violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Domestic Abuse

The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduced the first ever statutory definition of Domestic Abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse. They may also experience it within their own intimate relationships.

Our staff understand that these experiences can have a detrimental and long-term impact on their health, well-being, development, and ability to learn. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members.

Our staff are aware that Domestic Abuse can include intimate partner violence, abuse by family members, teenage relationship abuse and child to parent abuse and that anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and Domestic Abuse can take place inside or outside of the home.

Types of Domestic Abuse

Domestic Abuse can be, but is not limited to the following, signs to look out for and be professionally curious about:

- Controlling or coercive behaviour
- Violent or threatening behaviour
- Physical or sexual abuse
- Economic abuse
- Technology-facilitated abuse
- Psychological, emotional, or other abuse
- Stalking

- Violence against woman and girls **(VAWG)** includes but not limited to harassment, stalking, rape, sexual assault, murder, honour-based abuse, coercive control and while men and boys also suffer from many of these forms of abuse, they disproportionately affect women. Crime and Policing Bill: reducing violence against women and girls (VAWG) factsheet - GOV.UK

Child-to-parent-abuse (CPA) or adolescent-to-parent abuse (APA) is any behaviour used by a child or young person to control, dominate or coerce parents. It can include emotional, verbal, physical or financial abuse and includes “coercive control,” or in other words, the parent or other adult is compelled to change their own behaviours for fear of further abuse.

Female Genital Mutilation (FGM)

Keeping Children Safe in Education explains that FGM includes *‘all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs.’*

FGM is illegal in the UK and is considered as a form of child abuse that has significantly harmful and long-lasting consequences. It can also be referred to as ‘female genital cutting,’ ‘circumcision’ or ‘initiation.’

Our teachers are aware of their mandatory reporting duty and the requirement to immediately contact the Police if they are

- Informed by a girl under 18 that an act of FGM has been carried out on her.
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 (and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth).

The duty for teachers above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. In these circumstances, teachers know they must report to the DSL who will follow local safeguarding procedures.

Our members of staff who are not teachers, are aware that if they suspect a child is at risk or that FGM has been carried out, they should report this to the DSL immediately.

Preventing radicalisation

The Sunflower Federation is compliant with the Counterterrorism and Security Act 2015 under section 26, we exercise our duty, to have "*due regard to the need to prevent people from becoming terrorists or supporting terrorism*". This duty is known as the Prevent duty.

The Prevent duty is one of our wider safeguarding obligations. Our DSLs and senior leaders are aware of the revised Prevent duty guidance: for England and Wales, especially paragraphs 141-210, which are specifically concerned with education.

Our staff are aware that children may be susceptible to radicalisation into terrorism. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is a part of our school's 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.

The Prevent Duty is concerned with all forms of terrorism and extremism. It also includes some forms of nonviolent extremism. For example:

- Right Wing extremism
- Religious extremism
- Environmental and Animal Rights extremism
- School Massacre ideology
- Involuntary Celibate (Incel) ideology

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence.

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.

Although there is no single way of identifying whether a child is likely to be susceptible to radicalisation into terrorism, there are factors that may indicate concern.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to Children's Services website or Channel, the Government's programme for identifying and supporting individuals at risk of being drawn into terrorism.

The DfE also has a dedicated telephone helpline, 020 7340 7264, which all staff and governors can call to raise concerns about extremism for a pupil. In non-emergency situations DSLs can also email counter.extremism@education.gov.uk. In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321.

Concerns about Mental Health

Mental Health difficulties can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Poor or deteriorating mental health can also be a safeguarding concern in its own right. Our staff know to be alert to behavioural signs that suggest a child may be experiencing mental health or be at risk of developing one.

If a staff member has a concern about a child's mental health, no matter the level of the child's emotional difficulties, they must speak to the school's DSL who will evaluate if the child is at risk of immediate harm, and if so, will escalate to the appropriate level of support which includes speaking to the school lead for Mental Health.

If a child is experiencing low moods, low self-esteem and general anxiety, our school mental health lead will be able to provide some advice about some self-accessed support through relevant approved wellbeing websites and apps. If, however, the child is presenting with a concerning level of low mood and anxiety for a period then our mental health lead in partnership with the DSL will discuss with the child and their parents/carer to explore options of support.

If someone is experiencing suicidal thoughts but they do not need physical input from A&E, then consideration will be given to accessing support from the Single Point of Access (SPA)/Crisis team. If a referral for targeted mental health support is required, then a referral through SPA will be made.

If, however, a child/young person is at immediate risk the school will recommend they need to be sent to A&E or dial 999.

More information can be found in the Mental health and behaviour in schools guidance, colleges may also wish to follow this guidance as best practice. Public Health England149 has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among children. See Better Health Every Mind Matters for links to all materials and lesson plans.

youth-suicide-prevention-7-minute-briefing-may-2023.pptx

What all staff need to do to respond if Abuse, Neglect and Exploitation is suspected or been disclosed.

At The Sunflower Federation we adopt a whole school approach and safeguarding is everyone's responsibility. Staff and volunteers, and governors must comply with our safeguarding procedures as set out below:

Concerns about child-on-child abuse

In most circumstances, incidences of pupils hurting other pupils will be dealt with under our school's behaviour policy. Our child protection policy will apply to all incidents that raise safeguarding concerns where the alleged behaviour:

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

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

- Staff must record the allegation on CPOMS and report to the DSL, staff should not investigate the matter.
- The DSL will assess and consider the relevant next steps which may include, speaking with the child and parents, accessing relevant consultation lines provided to schools by the Local Authority, making a request for support to Children's Services as well as the Police if the allegation involves a potential criminal offence or the Child and Adolescent Mental Health Service (CAMHS), if appropriate.
- The DSL will consider whether a risk assessment or a safety and support plan would be beneficial for any children involved, including the victim(s), the child(ren) against whom the allegation has been made and any others affected, with a named person they can talk to if needed. This should include consideration of all aspects and areas of the school environment and beyond, for example off-site activities and school transport.
- The DSL will speak to the child and their parent/s or carers to share the concerns, gain their views and consent to liaise with other agencies if there are any identified risks and unmet needs.
- If the incident is a criminal offence school have a duty to report this and thereafter work closely with the Police (and other agencies as required) while protecting children and/or taking any measures to manage risk. For incidences which involve significant harm and/or a potential criminal offence, the DSL will endeavour to gain consent but may override this should not gaining consent increase the risk to a child.

Our DSLs are committed to ensuring that where concerns are raised about child-on-child abuse, incidences are taken seriously and dealt with fairly. DSLs will consider all information available to them and ensure that any action or decision is proportionate for all children involved, and that such decisions do not disproportionately impact on their access to education, although at times some restrictions or adaptations may be required to manage identified risk.

Creating a culture where children feel safe in school and minimising the risk of all forms of abuse.

We recognise the importance of taking proactive action to minimise the risk of any form of abuse, neglect, and exploitation irrespective of from whom and where this comes from, including child-on-child abuse. Creating a supportive environment where children can feel confident in reporting incidents is key to our safeguarding culture in The Sunflower Federation.

We expect all staff to:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders, for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils can report abuse using our reporting systems easily and confidently.
- Reassure victims that they are being taken seriously.
- Be alerted to reports of sexual violence and/or harassment that may point to environmental or systemic problems in the school or elsewhere that could be addressed by us updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with our safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, and alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms (adults close to the child and family) and any necessary support for siblings following a report of sexual violence and/or harassment.

Our staff are trained to understand:

- How to recognise the signs of child-on-child abuse and know how to identify it and respond to reports.
- Even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an open mind and attitude of “it could happen here.”
- If they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told; and always speak to the DSL should they be unclear,
- Children may not always make a direct disclosure and therefore they must be aware that:
    - Children can show signs or act in ways they hope adults will notice and react to; it may be that their difficulties emerge from behaviour when they do not have the language to express themselves.
    - A friend of the child may share information to a staff member or make comments; professionally curiosity is key, do not fear exploring the information and asking open ended questions.
    - Staff may overhear a conversation between children.
    - A child’s behaviour may change suddenly with no clear reason or precipitating event that might offer some explanation.
    - Some children can face additional barriers to telling someone, for example they have a disability, special educational need, age gender, ethnicity, and/or sexual orientation etc.
    - One child’s concerning/abusive behaviour towards another could be an indicator of that child having been harmed themselves.

If a child makes a disclosure to a member of staff or volunteer:

All staff are aware they should always be prepared as children can disclose spontaneously to anyone anywhere.

The Sunflower Federation is situated within the County of Hertfordshire which has a rich and diverse population. We cannot, and do not, assume that all children and their families have the ability, understanding, language and resilience to convey any difficulties they may experience. It is key to our school ethos to recognise the needs of children and their families and to recognise and provide support where English may not be their first language and/or the children or family members have special educational needs; and without doing so may impede their ability to represent their voice, wishes and feelings.

All staff know that we place the voice of children at the centre of everything we do and endeavour to place their best interests at heart. We ensure we know who our children are, staff are encouraged to be curious by speaking and listening to children whilst respecting any protected characteristics. We hope our children have confidence and trust in our staff, believing they will be taken seriously and be supported with their issues or concerns sensitively.

Staff also know that children may not always feel ready or know how to tell someone that they are being abused, neglected, or exploited and do not always recognise their experiences as harmful.

We listen to children by:

- Showing patience regardless of a child's age as we know they can find it hard to find the words to express themselves.
- Encouraging children to tell their story in their own words.
- Avoiding the use of leading questions or suggesting what may have happened, instead we maintain genuine curiosity, and only ask open-ended questions/prompts.

We reassure children by:

- Making sure a child does not feel they are in trouble and that they have done the right thing in speaking to staff
- We let a child know it is not their fault as children are often made to feel blame by those harming them
- Never promising confidentiality and being transparent about our obligations to share information if we are concerned that they are at risk of harm
- Helping children to understand how we plan to support them and their family and let them know what action we will need to take next to support them.

Recording concerns

Our staff know that reporting concerns is a procedural requirement when safeguarding and promoting the welfare of children. Our staff are clear that they must:

- Record all conversations relating to any level of concerns on CPOMS, our recording system; ensuring that the record is as detailed as possible, is factual, does not contain assumptions or personal judgement and captures the child's account in their own words.
- Inform the DSL about their concern as soon as possible; where the concern involves a disclosure or concern that the child is at risk of harm they must inform the DSL immediately.

Our staff are aware that such information is confidential and should be shared with the DSL only who may hold additional information about the child and their family and therefore can form a view on its significance and whether any action is required. Staff will not share information amongst themselves and will not share the information outside of the formal reporting process unless asked to by the DSL. This ensures that information is shared without delay enabling the DSL to carry out any necessary functions of their role whilst upholding confidentiality for the child and their family.

What school and college staff should do if they have concerns about a child

The Sunflower Federation is committed to ensuring that all children feel safe and comfortable to share and report any concerns and/or allegations about their personal experiences at home, in the community, online or regarding a member of staff or other children in the school. As outlined above, all our staff are clear on the importance of listening to and supporting children when making disclosures, and the need to reassure them.

Our staff are aware that children can share information with anyone in our school but there are clear reporting processes when such information sharing raises concern about their welfare. Children may talk about worries and anxieties around friendships and school life which they need to support with but on other occasions they may share information about their family life which indicates that the children and their family may be in need of help and/or fear or experiences which cause staff to be concerned about whether they have been harmed or are at risk of being harmed. Where such situation arises, our staff are clear on the reporting processes.

Any member of staff, including supply teachers, contract workers, volunteers, governors/trustees, and visitors at The Sunflower Federation who has any concerns about a child's welfare should:

- Maintain an attitude of 'it could happen here' where safeguarding is concerned and always act in the best interests of the child. Never promise a child confidentiality.
- Reassure the child they have done nothing wrong and if appropriate explain to them how they will be supported and who you will need to share information with.
- Record what the child or others have disclosed using their language - or describe what you have seen or suspect and your rational for this. Also ensure you make a note of any injuries observed or described by the child (*if it is the latter two*).
- Consider if the child needs medical attention and if so, prioritise ensuring they receive this.
- You must never delay reporting your concerns about the welfare of a child and always act immediately by reporting/speaking to the school's DSL/deputies.
- Record what the child or other has disclosed in their language or describe what you have seen or suspect and your rational for this (*if it is the latter two*).

The DSL or deputy will:

- Use Hertfordshire threshold guidance to initially assess the concerns raised and consider the impact on the child's welfare and safety. They will also review the child's record in order to establish if there have been any previous concerns (records help to establish relevant history and risk factors for example even if a concern appears low level on the surface, a series of incidents can highlight patterns of ongoing abuse and neglect.) The DSL will use the 'Continuum of Need' guidance to support their analysis and rationale for any decision.

- The DSL or deputy will speak to the child to verify their wishes and feelings, contact the child's parents or carers to either inform them of the concerns and also to gauge their view (it will be at the discretion of the DSL team to carefully consider if this action may place a child at further risk, e.g. if the child has disclosed abuse and neglect caused in the family home).

- If the child has not suffered significant harm as defined by the Children Act, DSL may also decide to seek advice through the range of Hertfordshire departmental non child protection advice lines. The purpose of these are to support DSLs to consider the best options to engage children and their families with an offer of early help support, preventing escalation where possible but also request for support via Children's Services where necessary. Examples of this are managing any support for the child internally via the school's or college's own pastoral support processes and/or undertaking a Families First Assessment

- If it is immediately apparent that a child has suffered significant harm or is at risk of harm e.g. suffered abuse, neglect and/or exploitation, the school's DSL will make a referral to Children's Social Care to request support at the earliest opportunity; consent will be gained where appropriate. If there has been a crime committed within the circumstances of the abuse, they will also report this to the Police.

What will the Local Authority Children's Social Care do?

Within one working day of a referral being made, a social worker should acknowledge its receipt to the school's DSL and plan about the next steps and the type of response that is required. This will include determining whether:

- The child requires immediate protection and urgent action is required.

- Any services are required by the child and family and what type of services.

- The child is in need and should be assessed under section 17 of The Children Act 1989. Working together to safeguard children provides details of the assessment process.

- There is reasonable cause to suspect the child is suffering, or likely to suffer, significant harm, and whether enquiries must be made, and the child assessed under section 47 of the Children Act 1989. Working Together to Safeguard Children provides details of the assessment process.

- Further specialist assessments are required to help the Local Authority to decide what further action to take.

- The DSL or deputies should follow up if this information is not forthcoming.

Anyone working/volunteering with children can make a referral, if in an emergency staff are unable to locate or do not have time to inform DSL of a serious concern, the following process must be followed without delay.

Making a referral to Children's Services and/or requesting support

Professional referrals are made using the online referral form located on Hertfordshire Safeguarding Children Partnership website (consent is needed from parents and carers, unless to do so may place a child at risk).

If someone is in danger or a crime has also been committed call the Police on 999.

1. Out of hours (17:30-08:00 and weekends) call 0300 123 4043.

2. **Members of the public (non-school staff), parents, carers, children, and young people can call Children's Services at any time of the day or night on 0300 123 4043.**

This link provides leaflet for parents and carers HSCP Family Leaflet (hertfordshire.gov.uk).

What children and young people need to know and do to report safeguarding concerns (Abuse, Neglect and Exploitation).

At The Sunflower Federation we cultivate a culture of openness and transparency and want to make it clear to all our pupils/students that we are available at any time to listen to you and will always take your concerns seriously, however small you may consider them to be.

Our pledge is:

- We will ensure we provide you with the space away from public areas for you to talk.
- We will listen without judgement and endeavour to respect your wishes and feelings.
- We want you to feel safe and we will be honest about our duty to prioritise your wellbeing and longer-term safety, this means, depending on the circumstances, we cannot offer you total confidentiality. We understand that this may create uncertainty, but we are confident that often when matters are dealt with as they emerge the longer-term prospects can be much improved for you and your family.
- We will respect your place but if we consider that you have suffered significant harm or are at risk of harm, we will need to share this information so that you and your family can be offered the right support. We will be clear on what information needs to be shared, with whom and how it might be used.
- When the concerns suggest you may benefit from early help support this may include considering support to your parents and carers with matters that will improve your situation.
- We will provide a named mentor for you so that you can have the confidence and trust to know that you have someone to go to at school if you are feeling vulnerable and experiencing difficulties.
- Your education and welfare is important to us and we want to reassure you that your experience at school remains positive, and you feel safe.

What you can do to report concerns:

- You can speak to any member of staff of your choice. Those staff will listen and support you, but we have a team of DSLs in our school who have a specific role to support children and therefore it is likely that the staff members will talk to them or arrange for you to.

If you are being abused, neglected, or exploited you can call Children's Services at any time of the day or night on **0300 123 4043.**

3. If you are in immediate danger and/or think a crime has/is being committed, you can call the Police on **999.**

You can contact the NSPCC Helpline by calling **0808 800 5000** or email help@nspcc.org.uk

Risk Management Plan (RAMP) and Safety and Support Plan (S&SP)

RAMP - When there has been a report of sexual violence, or and harassment, the DSL (or a deputy) will make an immediate Risk and Needs Assessment for both the alleged victim and the perpetrator. The RAMP is to enable the DSL to use their critical thinking and consider what the needs of any child/ren are, analyse what are the risks and what measures can be put in place to protect children and keep them safe from further harm. Risk assessments will be recorded (paper or electronic) and kept under review.

The school risk assessment is not intended to replace the detailed assessments of other expert specialist assessments, but the DSL will seek and share information from other agencies where required to inform the school's understanding form a multi-agency perspective so that a holistic approach in supporting and protecting children can be strengthened.

We are aware that children who are victims of sexual violence and sexual harassment will find the experience stressful and distressing, this can also impact on the family and can cause the child adverse effect on their educational attainment and can be exacerbated if the alleged perpetrator(s) attends the same school or college. The RAMP will take this into account and plan accordingly on the gravity of a situation on treat incidents on a case-by-case situation.

Keeping Children Safe in Education, Part Five Sexual Violence and Sexual Harassment provide statutory duty for schools and colleges.

The RAMP is the responsibility of The Sunflower Federation and leadership and management team, and it is critical that parents and cares place confidence and trust in our school by working with us and supporting the plan.

All schools and colleges are at liberty to adopt any form of risk management and safety planning protocols, at The Sunflower Federation we use the following types of risk management to not only support children presenting with Harmful Sexual Behaviour but more commonly we experience a range of specific safeguarding issues that vulnerable children and young people are faced with, examples of these cited in Part one and Annex B KCSiE.

Risk Assessment Management Plan (RAMP) for Harmful Sexual Behaviour (HSB)

The RAMP framework provides DSLs in our school/college the means to:

- Assess the needs and risk of children and young people when they have presented with Harmful Sexual Behaviour (for age-appropriate exploratory sexual behaviours, use Safety and Support Plan framework).
- Guidance and evidenced based resources to support DSLs critical thinking and analysis using a multi-agency approach to identify risk and strengths.
- Template to support and manage risk by developing a day today plan to safeguard and promote the welfare of Children and Young People (CYP), monitor and review their progress.

Safety and Support Plan (S&SP) for all safeguarding issues and specific forms of abuse and harm

The S&SP framework provides DSLs in our school to:

1. Assess the needs and risk of children and young people when they have presented with vulnerabilities associated with themes set out part one and Annex B 'Keeping Children Safe in Education' this includes all forms of child-on-child abuse. (If CYP is presenting with high problematic and Harmful Sexual Behaviour use the RAMP framework).

2. Guidance and evidenced based resources to support DSLs critical thinking and analysis using a multi-agency approach to identify risk and strengths.
3. Template to manage risk by with a day today support plan therefore safeguard and promote the welfare of CYP, monitor and review their progress.

10. Online Safety and Filtering

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. The Sunflower Federations Governing Body/Trustee Board ensures that our DSL takes lead responsibility for online safety and understanding the filtering and monitoring systems and processes we have in place, alongside their safeguarding and child protection duties.

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of pupils, staff, volunteers, and governors.
- Protect and educate the whole school community to be safe and responsibly use technology, including mobile and smart technology.
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in, and escalate any incidents or concerns, where appropriate.

Our approach to online safety is based on addressing the following 4 categories of risk as identified in Keeping Children Safe in Education:

Content – being exposed to illegal, inappropriate, or harmful content, for example: pornography, misinformation, disinformation, including fake news, and conspiracy theories., racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism

Contact – being subjected to harmful online interaction with other users, for example: child-on-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – online behaviour that increases the likelihood of, or causes harm, for example: making, sending, and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

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

To meet our aims and address the risks above, we will educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology.
- Keeping personal information private.
- How to recognise unacceptable behaviour online.
- Ensuring children know not to meet up with a person they have met online without a safe adult.
- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.

We will also:

- Train staff, as part of their induction, on how to keep themselves safe online as well as children, in line with the school's online safety policy This needs to include issues for example: cyber-bullying, the risks of online radicalisation, and the roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required at least once each academic year.
- Educate parents/carers about online safety through letters and emails sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their personal mobile phone and cameras, *for example that:*
    - *staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present*
    - *staff will not take pictures or recordings of pupils on their personal phones or cameras.*
- Make all pupils, parents/carers, staff, volunteers, and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that appropriate staff designated by the Headteacher or Principal, have the power to search pupil's phones, as set out in the DFE's guidance on searching, screening and confiscation if there is a concern regarding a child's safety or a crime in which case the Police will be contacted.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and child protection updates including online safety to all staff, at least annually, to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our online safety policy and mobile phone policies which can be found on our website

11. Managing Safeguarding Concerns or Allegations made about staff, including supply teachers, volunteers, and contractors

The Sunflower Federations 'low-level concern and allegations policy' is compliant with:

- KCSiE, Part four
- Hertfordshire Safeguarding Children Partnership Procedures Manual, Section 5.1.5 Managing Allegations Against People who work with Children and Young People
- Developing and implementing a low-level concerns policy (Farrer & Co), which provides

detailed guidance and examples.

This section of our policy is a reflection and extension of The Sunflower Federation's wider approach to the code of conduct of staff.

All staff and volunteers at The Sunflower Federation hold positions of trust and are expected to uphold safe working practices outlined in our staff code of conduct policy.

A 'position of trust' refers to any role where an adult holds power or influence over a child due to the nature of their work (either paid or voluntary). As defined in the Sexual Offences Act 2003 (Sections.16-24) and further clarified by the Crown Prosecution Service, **it is a criminal offence for anyone in a position of trust to engage in sexual activity with a child in their care – even if that child is aged 16 or 17 and legally considered to have reached the age of sexual consent (16)**; this includes both in-person and online interaction, within or outside of employed/voluntary hours.

A **breach of trust** occurs when an adult working or volunteering with children crosses established boundaries in their professional relationship with a child or young person through inappropriate behaviour that involves an abuse of their position or authority. The behaviour itself does not need to be illegal to constitute a breach of trust – even when the child or young person is over the age of consent (16). Examples include:

- A 19-year-old Youth Worker at a youth club initiating a personal relationship with a 16-year-old club member.
- A teacher engaging in an intimate or sexual relationship with a Sixth-Form student.

These behaviours undermine professional integrity and breach safeguarding standards and The Sunflower Federation's staff code of conduct regardless of legal consent due to the imbalance of power and the professional duty of care.

Section 11 of the 2004 Children's Act states that schools and colleges should have clear policies aligned with HSCP Procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e. members of staff, including supply teachers, volunteers and contractors. These policies must clearly distinguish between:

Allegations – a claim or assertion that someone has done something illegal or wrong, typically one made without proof. The *Harm Threshold* (see section *Managing Allegations*, below) for an allegation is when a person working or volunteering with children in a position of trust has or may have:

- Behaved in a way that has, or may have harmed a child/young person;
- Possibly committed a criminal offence against/related to a child/young person;
- Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm;*
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people;*

**These categories can include behaviour that may have happened outside of an organisation that might make an individual unsuitable to work with children/young people.*

Concerns about the quality of care/practice - is an accusation, not of a child protection nature, that the care/practice provided does not meet the expected standards. As with quality in other fields, it is an assessment of whether something is good enough and whether it is suitable for its purpose.

Complaints – an expression of dissatisfaction about actions or the lack thereof. Concerns may reflect a worry requiring reassurance, while complaints assert that something is

unacceptable

Levels of Concern and Allegation

There are two levels of Concerns and Allegations relating to adults (in both paid and voluntary roles) working with children either directly and/or online:

1. **Low-Level Concerns**

   These are behaviours by one or more adults (paid or voluntary) which are inconsistent with The Sunflower Federations staff code of conduct but ***do not meet the Harm Threshold*** (see above under definition of Allegations) and are referred to as 'Low-Level Concerns'. Examples include repeated breaches of The Sunflower Federations staff code of conduct in relation to safeguarding.

2. **Allegations**

   These are behaviours by one or more adults (paid or voluntary) that ***do meet or may meet the Harm Threshold*** (see above under definition of Allegations). Such cases require referral within **one working day** to the **Local Authority Designated Officer (LADO)** and potentially other statutory bodies such as the police or children's social care.

Low-Level Concerns and Allegations may emerge as a result of either observed suspicions or direct disclosures made by a child. In assessing the potential harm and impact to a child or young person, DSLs will consider the four categories of abuse – physical, emotional, sexual and neglect – as well as any safeguarding elements related to exploitation. Detailed definitions of these terms can be found in Chapters 4 and 9 on this policy.

The Harm Test is explained in the Disclosure and Barring service Guidance: Making barring referrals to the DBS and Section 31(9) of the Children Act 1989 (as amended by the Adoption and Children Act 2002).

Managing Low-Level Concerns (those that DO NOT meet the Harm Threshold for Allegation)

As part of our whole - school approach to safeguarding, we are committed to fostering an open and transparent culture where all concerns involving adults working in or on behalf of The Sunflower Federation (including supply teachers, volunteers, and contractors) are addressed promptly and appropriately.

Creating an environment where all concerns can be shared responsibly, with the right person, recorded accurately, and handled with care is essential to keeping our children and young people safe.

We aim to:

- Enable all stake holders to identify inappropriate, problematic, or concerning behaviour early and encourage them to do so.
- Reduce the risk of abuse by acting preventatively.
- Ensure that all adults working/volunteering in or on behalf of our school understand and adhere to professional boundaries consistent with our ethos and values at The Sunflower Federation.
- A 'Low-Level' Concern does not imply insignificance. It refers to any behaviour – however minor – that causes a sense of unease or a 'nagging doubt' about whether an adult's behaviour:
- Is inconsistent with The Sunflower Federation's staff code of conduct, including

inappropriate conduct outside of work, and

- Does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO.

Examples may include (but are not limited to):

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone, contrary to school policy
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- Humiliating children.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse. Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

The role of the Case Manager for Low-Level Concerns

In our school, the Case Manager is a senior leader—for example, the Headteacher, Principal, or Designated Safeguarding Lead (DSL). If concerns involve the Headteacher or Principal, the Chair of Governors or Trust, or Proprietor fulfils this role.

When a Low-Level Concern is raised (including third-party reports), the Case Manager or their nominated deputy will:

- Speak with the person who raised the concern (unless this was raised anonymously)
- Speak with the individual subject to the concern
- Identify and interview any other involved parties or witnesses

The information gathered will help us to categorise the type of behaviour and determine what further action may need to be taken. This information will be recorded in writing along with the rationale for our decisions and action taken.

The Case Manager, a nominated deputy, or Chair of Governors will respond to reports of Low-Level Concerns in-line with the schools' internal due processes for managing safe-staffing, our response may include the following:

- Prioritise the safety and wellbeing of any alleged victim and all other pupils
- Share details only with those who need to know to maintain confidentiality
- Conduct further inquiries with relevant children, staff, parents, or witnesses
- If there are reasonable grounds, launch a formal internal investigation following the school's internal processes
- Consult Human Resources on possible breaches of the staff code of conduct>, Teachers' Standards, or TA regulations to assess disciplinary thresholds
- Inform the subject of the concerns and outline available support during the inquiry
- Determine when to allow the subject to present their account
- Review all evidence and decide on an outcome

- If no risk of harm is found, consider additional training or monitoring for the staff member
- If new information raises serious risk or meets the harm threshold, refer the matter to the LADO

The Sunflower Federation fosters a safeguarding culture where every staff member is professionally curious. We:

- Clarify expected staff behaviour and help them distinguish it from concerning conduct
- Encourage prompt reporting of Low-Level Concerns
- Address unprofessional behaviour early and support corrective measures
- Handle concerns sensitively and in proportion to their nature
- Use reported concerns to identify and address any weaknesses in our safeguarding systems

Record keeping for Concerns and Allegations

It is vital that our stakeholders know how to share information about concerns for professionals and volunteers working with children. To ensure safe working practice:

- All staff and volunteers must record the details of the Low-Level Concerns and submit them to the Headteacher/Principal
- Records are confidential, stored securely, and comply with the Data Protection Act 2018 and UK GDPR
- If a pattern of inappropriate behaviour emerges, the Case Manager will decide on disciplinary action, or if the Harm Threshold is reached, refer to the LADO (per KCSiE Part Four, Section One)
- We will review and revise relevant policies or training to address any school-culture factors that enabled the behaviour
- Records of concerns are retained by The Sunflower Federation until the individual reaches retirement-age or for the next ten years, whichever period is longer

Managing Allegations (those that DO MEET the Harm Threshold for LADO)

When concerns/allegations meet the harm threshold The Sunflower Federation is required to comply with both Part Four of KCSiE and Hertfordshire Safeguarding Children Partnership Procedures Manual Section 5.1.5 Managing Allegations Against Adults Who Work With Children and Young People

All staff and volunteers at The Sunflower Federation are required to immediately report any level of concerns about behaviour and/or conduct of an adult working/volunteering with children towards a child to leadership and management. This includes reporting adults who are providing out of school activities/leasing the Sunflower Federation facilities.

These are The Sunflower Federations procedures for managing cases of concerns/allegations that meet the Harm Threshold and may indicate a person is a risk of harm to children if they continue to work in their present position, or in any capacity with children and young people. This is the process and the threshold criteria we apply if it is alleged that anyone working in our school or a college, including supply teachers, volunteers and contractors has:

Behaved in a way that has, or may have harmed a child/young person	*Possibly committed a criminal offence against/related to a child/young person*	*Behaved toward a child/young person in a way that indicates he or she would pose a risk of harm*	*Behaved or may have behaved in a way that indicates they may not be suitable to work with children/young people*
Harm Threshold	**Criminal Threshold**	**Suitability Threshold**	**Transferable Risk Threshold**
Examples: Sexual abuse, including grooming, both directly or online Physical abuse Emotional abuse Neglect Exploitation Any form of abuse and neglect that has caused a child significant harm (as defined in the Children Act 1989)	Examples: Adult has been arrested / reported for downloading indecent images of a child Any sexual act that meets a criminal threshold	Examples: Adult has been the subject of criminal procedures Caused harm or possible harm to a child or adult at risk Failed to understand or comply with the need for clear personal and professional boundaries in the workplace Conduct concerns or breach of policies that are more serious than Low-Level Concerns e.g. persistent, concerning behaviour	Examples: Concerns about the adult's 'reckless' behaviour and conduct in their personal and private life that could bring the school into disrepute Criminal misuse of substances, alcohol, drugs Criminal acts of dishonesty or violence against another person Sexual violence and harassment towards another adult or child Internet crime

What happens when an allegation is made against staff or a volunteer?

Headteacher/Chair of Governors may undertake initial inquiries to gather key information. They will assess whether the allegation meets the Local Authority Designated Officer (LADO) threshold, if it does, they will make a referral to LADO giving consideration to our school's staff code of conduct, managing allegations policy and 5.1.5 HSCP procedures. If necessary, they will compete a LADO referral within one working day.

If the allegation does not meet the harm threshold for LADO, our Headteacher/Chair of Governors will follow the school's Low Level Concerns policy.

Role of the Local Authority Designated Officer

The LADO does not have a public facing role. They do not, for example, liaise directly with children and their families, nor do they directly investigate allegations. Their role is as follows:

- **Case management** - oversee the process and ensure it is working, not to investigate.
- **Consultation** - provide advice and guidance to employers and voluntary organisations.

- **Monitoring** - the progress of cases to ensure that they are dealt with as quickly as possible consistent with a thorough and fair process.
- **Liaison** - with the Police, Children's Services, and other partner agencies (managers of the subject of allegation).

Role of school's Case Manager for Allegations

This will be a staff member in a senior role e.g. Headteacher/Principal or Chair of Governors/Trust, if the concerns are about our schools Headteacher/Principal, their remit is to:

- Clarify facts of the concerns/allegation (not investigate) before contacting the LADO.
- Take part in Strategy Meetings to liaise with other partner agencies.
- Undertake internal planned inquiries/fact finding.
- Take part to review the progress of the case in which there is a Police officer investigation.
- Operate a thorough disciplinary process when appropriate.
- Ensure a properly managed conclusion and outcome to process.

LADO Principles and Response

Timeliness - any allegation of abuse must be dealt with fairly, quickly, and consistently in accordance with the safeguarding and child protection procedures, this is best practice to provide immediate safety for child/ren and make safe arrangements for the person who is the subject of the allegation. It is crucial that employers **make a referral to LADO within one working day**.

Objectivity - it is not permissible for a member of staff to conduct (though their involvement may still be required) an enquiry about suspicion or allegation of abuse with respect to a:

- relative
- friend
- colleague, supervisor/supervisee or someone who has worked with her/him previously in any of these capacities.

If, following the conclusion of child protection processes, further enquiries are pursued for the purpose of disciplinary, regulatory or complaint investigation, they should be arranged in a way that avoids the repeated interviewing of children or other vulnerable witnesses.

Confidentiality - information about an allegation must be restricted to those who have a need to know in order to:

- protect children
- facilitate enquiries
- avoid victimisation
- safeguard the rights of the person about whom the allegation has been made and others who might be affected
- manage disciplinary/complaints aspects
- A media strategy should be developed with no improper or inadvertent releases of information to the media, in accordance with the Association of Chief Police Officers (ACPO) guidance (now known as The National Police Chiefs' Council (NPCC) .

Support - parents/carers of a child(ren) involved should be:

- Informed of the allegation as soon as possible, provided provision of information and advice at that stage does not impede the enquiry, disciplinary or investigative processes, and may need to be told immediately, e.g. a child requires medical treatment.
- Helped to understand the process involved and kept informed about the progress of the case.
- Told that there has been an enquiry or disciplinary process (but no detail is to be provided in relation to any internal hr processes).
- When necessary, helped to understand the outcomes reached (but see above proviso in relation to the provision of advice).
- The employer should keep the subject of the allegation informed of progress in the case and arrange to provide appropriate support (via occupational health or equivalent). If the person is suspended, (s)he should be kept informed of development in the workplace and if a member of a trade's union or professional association.

Monitoring - the LADO should monitor the progress of cases either fortnightly or monthly depending on its complexity either via review Strategy Discussions or by liaising with Police and/or Children's Services colleagues, or employer as appropriate. The Designated Officer should keep records to ensure that every case is dealt with without undue delay.

If the Strategy Discussion/initial evaluation have decided that a Police investigation is required, the Police Joint Child Protection Investigation Team (JCPIT) should also set a target date for reviewing the progress of its investigation and consulting the Crown Prosecution Service (CPS) to consider whether to charge the individual/continue to investigate/close the investigation. Whenever possible that review should take place within four weeks of the decision to initiate a criminal investigation.

If the investigation is to continue, dates for subsequent reviews, ideally at fortnightly (at most monthly) intervals, should be set at the meeting.

Target Timescales - it is in everyone's interest for cases to be dealt with as quickly as possible, consistent with a fair and thorough investigation. Timescales (which are not performance indicators) will depend on nature, seriousness, and complexity of allegation(s) though in general (based upon data about allegations against education staff):

- 80% of cases should be resolved within one month
- 90% within three months.

All but the most exceptional should be completed within twelve months (it is unlikely cases requiring a criminal prosecution or complex Police investigation can be completed in less than three months).

Reporting Concerns and Allegations

Concern/Allegation about	Report to
Member of staff (including volunteers, supply staff and contractors)	**Headteacher, Principal or Proprietor** **(or other with leadership status)** If the allegation is against supply staff or contractor, leadership, management will pass on report to the adult's employer at their agency/company.

Headteacher, Principal or Proprietor	**Chair of Governors / Vice Chair of Governors / Trustee board** Your school website or Child Protection policy will have details of your Chair/Vice Chair of Governors.
Chair of Governors / Vice Chair of Governors / Trustee board Or Manager who is the sole proprietor	**Local Authority Designated Officer LADO** *(for staff only)* LADO.Referral@hertfordshire.gov.uk and/or Report to the police on 101 or if urgent 999
If you are worried that the concerns raised have not been taken seriously or escalated.	**Chair of Governors** **Police** 101 **Children Services** 0300 123 4043 **NSPCC Whistleblowing Helpline** 0800 028 0285 **NSPCC Whistleblowing Email** help@nspcc.org.uk
Concerns/Allegations relating to an incident that happened when an individual or organisation has used school premises for running activities for children e.g. community groups, sports and faith associations, or service providers that run extra-curricular activities)	**Headteacher, Principal or Proprietor** As with any safeguarding allegation, DSL will follow their schools safeguarding policies and procedures, including informing the LADO. Out-of-school settings: safeguarding guidance for providers - GOV.UK

Concern about the Quality of Care/Practice: If a stakeholder is concerned about a matter that is not of a child protection nature, but general queries about the perceived quality and standard of certain practice in our school and it is considered that something is not good enough or/suitable for its purpose.

Please speak to Headteacher or our Chair of Governors.

Complaints: if a stakeholder is unsatisfied with any aspects of how we implement and comply with safeguarding policies and procedures, to keep children and young people safe in our school.

Please refer to our *Complaints Procedures* which will advise as part of the stages, to share any initial queries and concerns with our schools Headteacher or our Chair of Governors. Your feedback is important to us, and we would like to ensure to have an opportunity to reassure our stakeholders that any expression of dissatisfaction however made, about actions taken or a lack of action' is a priority to understand so that we can find a solution and support a complainant.

Our Complaints Procedures can be found on our school website.

After-school clubs, community activities and tuition: safeguarding guidance for providers

The Sunflower Federation have a legal duty of care to ensure we maintain a safe environment for children. If we receive an allegation or concern relating to an incident that has happened when an outside individual or organisation are using our school premises, we will ensure that we follow our school's safeguarding and child protection procedures, which includes reporting allegations to the LADO, Children's Social Care and Police if a crime has been committed.

It is the role of the Sunflower Federations governing body to ensure any organisation that hires the school premises is compliant with the guidance set out in After-school clubs, community activities and tuition: safeguarding guidance for providers – GOV.UK (www.gov.uk) In particular we have embedded within our lease agreement with external organisations the standards and expectations for them to provide evidence and assurance of their safeguarding and child protection procedures.

Whistleblowing

At The Sunflower Federation we strive to create a culture of openness, trust, and transparency to encourage all staff to confidentially share any concerns they have about poor or unsafe practice, concerns or allegations against staff or the school's safeguarding practice and arrangements so they can be addressed appropriately.

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding procedures and arrangements.

Examples where Whistleblowing may apply:

- Pupil's or staff member's health and safety are being put in danger.
- Failure to comply with a legal obligation or statutory requirement.
- Attempts to cover up the above, or any other wrongdoing that is in the public/school interest

Do not delay! Your concerns should be taken seriously and investigated, and your confidentiality respected.

You should report your concern to the Headteacher/other member of staff on the Senior Leadership Team, and if concerns are about the Headteacher, report to the Chair of the Governing Board/Board of Trustees.

If, for any reason, there are difficulties with following the above procedure, you can whistle-blow directly to Children's Social Care on 0300 123 4043 and/or the Police on 999, or to the NSPCC Whistleblowing Helpline 0800 028 0285 or email help@nspcc.org.uk

12. Record Keeping

The Sunflower Federation will hold records confidentially, safely, securely and in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached (including rationale), and the outcome.

Concerns and referrals will be kept in a separate child protection file for each child (either paper recorded or electronically).

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to know/access them.

Safeguarding records relating to an individual child will be retained for the student until they reach their 25th birthday or 31st birthday if there is an EHCP in place (Information Records Management Society 2022). eBook: Ultimate Guide to Electronic Records Management | Laserfiche

Safeguarding records which contain information about allegations of sexual abuse were being retained for the Independent Inquiry into Child Sexual Abuse (IICSA). This has now concluded, and the Home Office sent a letter to schools advising that files no longer needed to be kept indefinitely. However, the recommendations from the inquiry have stated:

Recommendation 17: Access to records The UK government should direct the Information Commissioner's Office to introduce a code of practice on keeping and accessing records which relate to child sexual abuse. The code should require records about child sexual abuse and allegations of child sexual abuse to be kept for 75 years, with appropriate review periods.

The school will follow the Recommendation 17.

Receiving in and transferring pupil records to other education provision

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their safeguarding information file is forwarded as soon as possible, securely, and separately from the main pupil file.

To allow the new school/college to have support in place when the child arrives, this should be within:

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

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

Retention, archiving and destruction of records

For records that are not transferred to another school, for example the child leaves the country or is going to be home educated, we have:

- a clear retention policy
- secure and appropriate system to archive with restricted access
- we have a written assurance from our providers of our electronic recording systems that all records are maintained securely which includes any archived records.

Storage, retention, and destruction of our child protection files is also made clear in our data management policy.

13. Safeguarding Training and Development

All staff receive approved safeguarding and child protection training (including online safety) so that everyone understands the expectations, applicable to their role and responsibilities. We ensure that all staff and volunteers' continuous professional development (CPD) is maintained and keep a record of this. In addition to statutory training all staff receive regular updates and CPD via email, e-bulletins, and staff meetings.

The statutory and non-statutory training offer provided by the CPSLO service is set out in Appendix 4.

At The Sunflower Federation we access training in line with our statutory requirements in Keeping Children Safe in Education, local expectations set out by Hertfordshire Safeguarding Children Partnership and recommendations of good practice by HCC's Child Protection School Liaison Service.

14. Quality Assurance, Improvement and Practice

The purpose of auditing is to quality assure safeguarding arrangements and identify where they need to improve professional development and strengthen practice, it can also evidence the settings strengths and practice. Effective safeguarding should be part of a schools/college management shared approach and should be embedded in the vision, ethos, and strategic direction so that a 'whole school approach' is achieved as this is what ultimately creates a safe and secure environment for children and young people to learn and develop and feel safe.

Auditing is essential for management and leaders to be able to reassure stakeholders about how schools/colleges are complying with the contractual requirements for safeguarding arrangements are met

The Sunflower Federation endeavours at all times to provide an education and learning environment where children and our staff feel safe. One way we review and monitor our practice is through auditing: it is important that we are aware of the level of our school's compliance to key guidance, such as KCSiE. We want to be open, transparent and reassure ourselves and our stakeholders, including regulators, what we are proud of and what we need to strengthen to meet our own ambitions for standards. It is therefore standard practice that we factor in on-going auditing schedule objectivity and scrutiny by our Governing Body and all Senior Leadership, children, students and their parents and carers.

We also commission other scrutineers to help us seek reassurance of our safeguarding practice, e.g. Herts for Learning Education, School Effective Advisors and the Local Authority Child Protection School Liaison Service who act as the interface between education and Hertfordshire Social Care and provide support and advice when required.

Parents and carers please note that schools designated leads for safeguarding access the CPSLO service to talk about concerns they may have about a child, young person.

This policy will be reviewed **annually** by Darren White, Deputy Head and Safeguarding Lead . At every review, it will be approved by our full Governing Board.

15. Additional Associated Safeguarding Policies and Procedures

See below additional associated safeguarding polices for The Sunflower Federation

Code of Conduct

Complaints

Health and Safety

Attendance

Equality

Behaviour

Anti Bullying and Anti-Harassment

Relationships and Sex Education

Designated Teacher for looked-after and previously looked-after children

Staff Disciplinary procedures, which will be used if staff breach this code of conduct. It also sets out examples of what we will deem as misconduct and gross misconduct.

Online safety

Whistleblowing

Social Media

Safer recruitment

Appendix 1: Declaration for whole school staff

Declaration for whole school staff to verify they have read and understood the school's Child Protection Policy and other key guidance

School/College name:
Academic Year: September 2025/2026
Return declaration to: Darren White or Deputy DSL's by: Date 15/09/2025

Please agree a time and date with your school's DSL/DDSL, to read the following Child Protection Policy and associated parts of statutory guidance Keeping Children Safe in Education DfE 2025. Please thereafter verify that you understand your role and responsibilities in relation to these.

	Statutory Guidance and School's Child Protection Policy	Date and Verification When Completed
1.	The school's Child Protection Policy (arrangements for safeguarding and promoting the welfare of children in your school)	
2.	Part One of KCSiE 2025 (or Annex A is a condensed version of Part One and for non-teaching staff) Safeguarding information for all staff, what you should know and do to safeguard children	
3.	**Annex B (Specific Safeguarding issues) KCSiE 2025**	
4.	Having read the above guidance, I understand my role and responsibilities to comply with these	I agree or I do not agree and require further support from DSL
5.	I am aware of who my school's DSL and Deputy(s) for safeguarding are	<Insert name/s of DSL and DDSL/s>
6.	If I need support or I am worried about the wellbeing and safety of a child(ren) or suspect they are being harmed, I know how to report this and/or discuss any concerns with the DSL/DDSL team in my school	I agree or I do not agree and require further support from DSL
7.	I know that further guidance, together with copies of the policies mentioned above, are available at:	

Declaration: I ……<insert staff name> have read my school's Child Protection Policy and the associated guidance as above and agree that I understand my role and responsibilities in relation to safeguarding children and promoting their welfare at ……...

Signed ……and returned to DSL on ……. (DATE)

[Governors/Trustee, you are only required to sign this declaration if there is no opportunity for

you to confirm electronically on HFL Governor Hub/alternative document. If the latter is the case and you do sign this declaration, please ensure the copy with signatures is kept as a master by the school and a copy without signature is placed on your school's website]

Appendix 2: Declaration for Governance

Declaration for Governing Body (GB) to verify they have read the school's Child Protection Policy and KCSiE 2025

School/College name: *<Insert name of school >*
Academic Year: September 2025 - 2026
Return declaration to: *<Insert name of the Chair of Governors >* by: Date Click or tap to enter a date.
Please agree a time and date with your Chair of Governor/Link Governor for safeguarding, to read the Statutory Guidance and Policy set out in table below:

	Statutory Guidance and School's Child Protection Policy	Date and Verification When Completed
1.	The school's Child Protection Policy (arrangements for safeguarding and promoting the welfare of children in your school)	Click or tap to enter a date.
2.	The entirety of KCSiE 2025	Click or tap to enter a date.
3.	Having read the above guidance, I understand my strategic leadership role and responsibilities to work with my corporate GB to ensure that all staff and volunteers comply with such guidance and safeguarding arrangements at all times.	I agree or I do not agree and require further support from DSL
	If applicable insert any other relevant documentation/guidance GB is required to read and verify, if not applicable remove this section.	Click or tap to enter a date.
4.	I am aware of who within my school leadership and management are the DSL and Deputy(s) for safeguarding are	<Insert name/s of DSL and Deputies>
5.	If I need support, or am worried about the wellbeing and safety of a child(ren), or I suspect a child is at risk of being harmed, I know how to report this and discuss my concerns with the DSL/DDSL team in my school	I agree or I do not agree and require further support from DSL
6.	I know that further guidance, together with copies of the policies mentioned above, are available on the school's website and the HGfL website.	<insert location of relevant website or other > Homepage - Hertfordshire Grid for Learning (thegrid.org.uk)

Declaration: *I…….. <insert name > have read my school's Child Protection Policy and the associated guidance as above and agree that I understand my role and responsibilities as a Governor in relation to safeguarding children and promoting their welfare at <Insert name of school and your role on the GB >.*

Signed …… and returned to Chair of Governors/Link Governor for safeguarding on Click or tap to enter a date.

Appendix 3: Operation Encompass Safeguarding Statement

Our school is part of Operation Encompass. Operation Encompass is a national Police and education early intervention safeguarding partnership which supports children and young people who experience Domestic Violence and Abuse, and which is in place in every Police force in England and Wales.

Children were recognised as victims of domestic abuse in their own right in the 2021 Domestic Abuse Act.

Operation Encompass means that the Police will share information with our school about **all** Police-attended Domestic Abuse incidents which involve any of our children PRIOR to the start of the next school day.

Once a Key Adult (DSL) and their deputy/ies (DDSLs) have attended either an Operation Encompass briefing or completed the online Operation Encompass Key Adult training they will cascade the principles of Operation Encompass to all other school staff and Governors. All school's staff and Governors can undertake the online training.

Our DSL undertook training on ***XXXXX (date including year)***

Our DDSLs undertook training on ***XXXXX (date including year)***

Our Safeguarding Governor undertook training on ***XXXX (date including year)***

X (number) of staff have completed the training ***(dates including year)***.

Our parents are fully aware that we are an Operation Encompass school, and we ensure that when a new child joins our school the parents/carers are informed about Operation Encompass.

The Operation Encompass information is stored in-line with all other confidential safeguarding and child protection information.

As a staff we have discussed how we can support our children who are experiencing Domestic Violence and Abuse on a day-to-day basis and particularly following the Operation Encompass notification. We have used the Operation Encompass Handbooks to inform our thinking.

We are aware that we must do nothing that puts the child/ren or the non-abusing adult at risk.

The Safeguarding Governor will report on Operation Encompass in the termly report to Governors. All information is anonymised for these reports.

We have used the Operation Encompass Key Adult Responsibilities checklist to ensure that all appropriate actions have been taken by the school.

When Headteacher, DSL or DDSLs leave the school and other staff are appointed, they will ensure that all Operation Encompass log-in details are shared with the new Headteacher/Key Adults and that the new member of staff will undertake the Operation Encompass online training.

Appendix 4: Safeguarding Children Training and Development

<table>
<tr><th colspan="2">Safeguarding Children Induction</th></tr>
<tr><td colspan="2">All staff should be aware of systems within their school or college which support safeguarding, and these should be explained to them as part of staff induction. Part one, KCSIE</td></tr>
<tr><td>Training type: Safeguarding Children Induction
Professional standard: Essential awareness
Status of training: Statutory requirement

Frequency, duration, and delivery method:
• Within the first week of commencing in post
• One hour PowerPoint presentation and provision of schools associated polices and CP procedures
• Face to face in school or virtual.

Targeted delegates: All staff including deputy DSLs, supply teachers, volunteers, and contractors.

Training provider and delivered by: Child Protection School Liaison Service produce materials for DSL to deliver.</td><td>Aims: To ensure that all staff/volunteers are made aware of systems within their school or college which support safeguarding children.

Learning Objectives: To ensure that all staff know:
• Child protection policy: The process for responding to all forms of harm but in particular child-on-child abuse, directly and online
• Behaviour policy: how to prevent prejudice-based discriminatory bullying
• Code of conduct: reporting low-level concerns, allegations against staff and whistleblowing
• Safeguarding children absent from education: Looking out for patterns of repeat occasions and prolonged periods
• Role of the Designated Safeguarding Lead (DSL): Who are they and how to share information about concerns.
• Part one KCSiE: Copies of this will be issued at induction with expectation that staff read and sign to say they understand their role in accordance with this guidance.</td></tr>
<tr><th colspan="2">Safeguarding Children Training</th></tr>
<tr><td colspan="2">All staff should receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring). The training should be regularly. Part one KCSiE</td></tr>
<tr><td>Type of training: Safeguarding Children Training
Professional standard: Informed training
Status of training: Statutory

Frequency, duration, and delivery method:
• Within the first term of commencement in post and thereafter undertaken every 3 years.
• Two-hour PowerPoint presentation.
• Face to face in school or virtual online.

Targeted delegates: All staff including supply teachers, volunteers, contractors, and FSW, SENCO, pastoral staff, DSL/DDSL, DT for CLA, MH lead – Staff who are likely to come into contact with CYP and their families who are experiencing any level of need and have a duty to recognise CYP who would benefit from support under the following thresholds:
Universal (personalised support), Additional (targeted), Intensive (multi agency/family support framework) and Specialist (high level intervention/statutory support)
Training provider and delivered by: CPSLO Service.</td><td>Aim:
To ensure that all staff and volunteers have regard for Part one of KCSiE, when carrying out their role to safeguard and promote the welfare of children.

Learning objectives:
4. What school and college staff should know and do
5. What school and college staff need to know
6. What school and college staff should look out for
7. What school and college staff should do if they have concerns about a child
8. What school and college staff should do if they have a safeguarding concern or an allegation about another staff member
9. What school or college staff should do if they have concerns about safeguarding practices within the school or college.</td></tr>
<tr><th colspan="2">Safeguarding Children Training - Annual Update (whole school staff)</th></tr>
<tr><td colspan="2">All staff should receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively. Part one, KCSiE</td></tr>
<tr><td>Type of training: Safeguarding Children Training - Annual Update.
Professional standard: Informed Training
Status of training: Statutory requirement.

Frequency, duration, and delivery method:
• Annually, (in addition to 3 yearly SCT)
• Up to 90 minutes, PowerPoint presentation and provision of schools associated polices and CP procedures</td><td>Aim:
To provide an opportunity for all staff and volunteers to receive local and national updates to provide them with relevant skills and knowledge to continue to safeguard children and promote their welfare effectively. To provide an appraisal to staff outlining the school's/college's continuous improvement and ratify the importance that the whole school approach lends to this.

Learning objectives:</td></tr>
</table>

• Face to face in school or virtual. **Targeted delegates:** All staff including supply teachers, volunteers, contractors, and FSW, SENCO, pastoral staff, DSL/DDSL, DT for CLA, MH lead – Staff who are likely to come into contact with CYP and their families who are experiencing any level of need and have a duty to recognise CYP who would benefit from support under the following thresholds: Universal (personalised support), Additional (targeted), Intensive (multi agency/family support framework) and Specialist (high level intervention/statutory support) **Training provider and delivered by:** CPSLO Service produce the training package for DSL to deliver to staff.	1. KCSiE updates and other relevant statutory and local guidance 2. Staff roles and responsibilities to keep children safe: • be aware of their local **early help process** • aware of **how to make referrals** to Children's Social Care for statutory assessments under the Children Act 1989 • **what to do** if a child tells them they are being abused, exploited, or neglected • maintain an appropriate level of **confidentiality** • be able to **reassure victims** that they are being taken seriously and that they will be supported and kept safe • staff to **build trusted relationships** which facilitate communication with children, young people, and their families • **safeguarding school culture** (Safe working Practice).
Designated Safeguarding Lead (including deputies) Training (2 Days)	
The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). Responsibilities include providing advice and support to staff on child welfare, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children. *The DSL (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. Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description.* *Annex C: Role of the Designated Safeguarding Lead (and deputies)*	
Type of training: Designated Safeguarding Lead (including deputies) Training **Professional standard:** Skilled, specialist and Strategic Specialist Leadership **Status of training:** Statutory **Frequency, duration, and delivery method:** • This training is modular based and covers the specifications of DSL job description • To undertake training prior to commencing the DSL/DDSL role, this to be updated at 2 yearly intervals • The course is over 2 working days • Delivered by PowerPoint face to face at Hertfordshire Development Centre (Robertson House). **Targeted delegates:** Senior leaders in the role of Designated Lead for safeguarding and deputies. **Training provider and delivered by:** CPSLO Service.	**Aim** To ensure that DSL (and deputies) have regard for Annex C, Keeping Children Safe in Education when carrying out their role to safeguard and promote the welfare of children. **Learning objectives:** To ensure that DSL/DDSL understands their duties in accordance with their job specification in relation to: 1. Availability 2. Manage referrals 3. Working with others 4. Information sharing and managing the child protection file 5. Raising awareness 6. Training, knowledge, and skills 7. Providing support to staff 8. Understanding the views of children 9. Holding and sharing information.
Designated Safeguarding Lead (and deputies) - Refresher Training	
• *The DSL (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 <u>at least every two years</u>. Any deputies should be trained to the same standard as the DSL and the role should be explicit in their job description.* *Annex C: Role of the Designated Safeguarding Lead (and deputies)*	
Type of training: Designated Safeguarding Lead (and deputies) Refresher Training **Professional standard:** Skilled, specialist and Strategic Specialist Leadership **Status of training:** Statutory requirement **Frequency, duration, and delivery method:** • Refresh DSL/DDSL training at 2 yearly intervals (Following DSL 2-day course). • Half day course either AM or PM • Delivered by PowerPoint virtually. **Targeted delegates:** Senior leaders in the role of Designated Lead for safeguarding and deputies DSLs. **Training provider and delivered by:** CPSLO Service.	**Aim:** To ensure that all DSL/DDSLs have regard for *Keeping Children Safe in Education* and update their skills and knowledge every two years to understand any changes to national and local guidance's that are required to enable DSLs to carry out their duties to safeguard and promote the welfare of children. **Learning objectives** • Leadership and Management of Safeguarding • National and local guidance updates • The role and responsibilities of the DSL and (deputies) • Assessing children and young people's needs and providing support/early help • Pupil Voice • Information sharing and record keeping • Promote supportive engagement with parents and/or carers/courageous conversations. • Statutory support- Significant Harm Threshold criteria

	• Safeguarding issues and Specific forms of abuse (Annex B) updates • Working with others (inc. partner agencies) • Safeguarding concerns or allegations against staff • Safeguarding practice review • Inspection of safeguarding • Appraisal and impact of education sector on the well-being of children and young people in Herts • Supporting continuous professional development.
Managing Safeguarding concerns or allegations made about staff	
353. Schools and colleges should have their own procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges in a paid or unpaid capacity, i.e., members of staff, including supply teachers, volunteers, and contractors. *355. These procedures should be consistent with local safeguarding procedures and practice guidance (Hertfordshire Safeguarding Children Partnership procedures 5.1.5.) Part four KCSiE 2024*	
Type of training: Managing Safeguarding concerns or allegations made about staff **Professional standard:** Skilled and specialist **Status of training:** Recommended best practice **Frequency, duration, and delivery method:** • Every Four years, • Half day PowerPoint presentation • Face to face training held at Hertfordshire Development Centre (Robertson House) or virtually via Microsoft teams. **Targeted delegates:** Senior Managers/Leadership teams Inc. Governance **Training provider and delivered by:** CPSLO Service / Local Authority Designated Officer LADO	**Aim:** To ensure that leadership and management understand the procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools and colleges as set out in *Part four KCSiE* and *Hertfordshire Safeguarding Children Partnership procedures 5.1.5.* **Learning objectives:** • Legislation, Statutory and local guidance • The scale of abuse • Profile of offending behaviours • Procedures for dealing with safeguarding concerns or allegations against those working in or on behalf of schools (Part *four KCSiE* and *Hertfordshire Safeguarding Children Partnership procedures 5.1.5.)* • Whole school approach to a safer working culture.
Safer Working Practice Training	
71 What school and college staff should do if they have a safeguarding concern or an allegation about another staff member. Schools and colleges should have processes and procedures in place to manage any safeguarding concern or allegation (no matter how small) about staff members (including supply staff, volunteers, and contractors). *74 What school or college staff should do if they have concerns about safeguarding practices within the school or college. All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school's or college's safeguarding provision and know that such concerns will be taken seriously by the senior leadership team.* KCSiE	
Type of training: Safer Working Practice Training **Professional standard:** Informed training **Status of training:** Recommended best practice. **Frequency, duration, and delivery method:** • At the discretion of leadership and management. • Two-hour PowerPoint presentation. • Face to face in-house or Virtual online. **Targeted delegates:** All staff including the senior leadership [team, supply teachers, volunteers, contractors, and senior leadership team. **Training provider and delivered by:** CPSLO Service	**Aims:** To safeguard children and young people (CYP) from potential harm that an individual, group, or poor culture of safeguarding practice could cause. To thereby raise awareness of what safe practice is when working with CYP and know what to do if there are concerns. **Objectives:** • Safe and unsafe practices that could harm or pose a risk of harm to children • Processes and procedures should be in place to manage any safeguarding concern or allegation • Low-level concerns that do not meet the harm threshold • Allegation that would meet harm threshold for referral to Local Authority Designated Officer (LADO) • Reporting concerns to LADO • How to raise concerns about safeguarding practices within the school or college • Ongoing vigilance of a safe school culture.
Safeguarding Children Training for Governing Bodies & Trustees Boards	
79. Governing bodies and proprietors should ensure that all governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in schools and colleges are effective and support the delivery of a robust whole school approach to safeguarding. *Training should be updated regularly.* ***Part two KCSiE***	
Type of training: Safeguarding Children Training for Governing Bodies & Trustees Boards **Professional standard:** Informed	**Aims:**

Status of training: Best practice **Frequency, duration, and delivery method:** • Every 3 years • Twilight 2-hour training • PowerPoint presentation. • Virtual via MicroSoft teams. **Targeted delegates:** All Governors and trustees, including chair of governors, vice chair and link governor for safeguarding. **Training provider and delivered by:** Herts for Learning Education (delivered by CPSLO Service)	To ensure Governing bodies, trustee boards and proprietors understand their leadership role and responsibilities in accordance with Part two KCSiE **Learning objectives:** • Legislation and the law • Safeguarding policies and procedures • Strategic role to ensure schools safeguarding policies and procedures are effective • Holding school to account for effective delivery of a whole school approach to safeguarding.
Safer Recruitment Training	
213. Governing bodies and proprietors should ensure that those involved with the recruitment and employment of staff to work with children have received appropriate safer recruitment training, the substance of which should at a minimum cover the content of Part three KCSiE	
Type of training: Safer Recruitment Training **Professional standard:** Skilled **Status of training:** Mandatory to have at least one person on recruitment panel trained **Frequency, duration, and delivery method:** • Every 4 years • Whole day or 2-hour twilight • Face to face inhouse or Virtual online. **Targeted delegates:** Any staff or governor from leadership and management. **Training provider and delivered by:** Herts for Learning Education (endorsed by the Safer Recruitment Consortium)	**Aims:** To ensure leadership and management adopt a whole school approach to create a culture that safeguards and promotes the welfare of children in their school or college and as part of this adopt robust recruitment procedures that deter and prevent people who are unsuitable to work with children from applying for or securing employment, or volunteering opportunities in schools. **Objectives:** • Raise an awareness and understanding of offender behaviour • Identify the key features of staff recruitment that help deter or prevent the appointment of unsuitable people • Consider policies and practices that minimise opportunities for abuse or ensure its prompt reporting • Explore the elements that contribute to an ongoing culture of vigilance • Help participants begin to review their own and their organisation's policies and practices with a view to making them safer
Prevent in Education Training	
The Prevent duty All schools and colleges are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. KCSiE page 157 Annex B	
Type of training: Prevent in Education Training **Professional standard:** Informed, Skilled and Specialist training **Status of training:** Mandatory **Frequency, duration, and delivery method:** • Every 3 years • Half day course PowerPoint presentation. • Virtual via Microsoft teams. **Targeted delegates:** All staff including the senior leadership [team, supply teachers, volunteers, contractors, and senior leadership team. **Training provider and delivered by:** Sophie Lawrence, Prevent Programme Manager, Community Protection HCC co trainer CPSLO service	**Aims:** To train DSLs on their school's Prevent duty in order that they can update their skills and knowledge and train their school's whole school staff to safeguard and promote the welfare of children against radicalisation. **Learning objectives** • Counter Terrorism Strategy • Definitions and Terminology • The Prevent Duty for your setting and Ofsted Inspection Framework • Vulnerabilities and Characteristics that increase risk of radicalisation • Spotting the Signs • Things to look out for • Notice, Check, Share • Channel Programme • Case Studies Fundamental British Values