



## Safeguarding and Child Protection Policy

The Ivy Learning Trust's Safeguarding Policy is monitored by the Local Governing Board and the Board of Trustees and will be reviewed annually or when new legislation demands adaptation, whichever is the soonest.

**Date Agreed:** 24 March 2022    **Agreed by:** Ivy Learning Trust Board    **Review Date:** September 22

**Date of last review:** 23 September 2021

### Other Documents

This policy sets out the overarching key aims and principles for safeguarding across Ivy schools. As an appendix to this policy, each school will have its own specific procedures in terms of to whom concerns should be given and other procedure documents relevant to this policy. The individual procedures will in no way conflict with the statutory procedures within this document. School procedures will be monitored and reviewed by the Local Governing Board.

### Inclusion

The Ivy Learning Trust carefully considers all policies with respect to the impact on equality and the possible implications for pupils and staff with protected characteristics. See **4 below** for points specific to this policy.

As part of the process of drafting this policy, consideration has been given to any potential impact on those with protected characteristics within Ivy:

Protected characteristic	Impact	Protected characteristic	Impact
Age	Neutral	Pregnancy/ maternity	Neutral
Sex	Neutral	Marriage/ civil partnership	Neutral
Disability	Neutral	Gender reassignment	Neutral
Ethnicity, race and culture	Neutral	Religion or belief	Neutral
Sexual orientation	Neutral		

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## 1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff, including those who do not directly work with children are aware of their statutory responsibilities with respect to safeguarding, by signing that they have read Part 1 of KCSiE 21
- Staff are properly trained in recognising and reporting safeguarding issues, including all new government guidance
- Staff understand that even if there are no reports of sexual violence and/or harassment in their schools it does not mean it is not happening.

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), [Child abuse concerns: guide for practitioners](#), [Sexual violence and sexual harassment between children in schools and colleges](#) and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (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

This policy also meets requirements relating to safeguarding and welfare in the [Statutory framework for the early years foundation stage](#)

This policy also complies with our funding agreement and articles of association. This policy also pays heed to the Data Protection Act 2018 and GDPR. Staff are encouraged to read: [Information sharing: advice for practitioners providing safeguarding services](#)

### 3. Definitions

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

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

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

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

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

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children. Also referred to as ‘nudes’ or ‘semi-nudes’

**Mental Health** is something staff should consider when this may be a safeguarding concern.

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

The following **3 safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

#### **4. Equality statement**

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after

#### **5. Roles and responsibilities**

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

##### **5.1 All staff**

All staff, including those who do not directly work with children will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2021](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the Ivy Staff Code of Conduct, Ivy Governance Code of Conduct, Ivy Capability Procedures, Ivy Whistleblowing Policy, Policy and procedures for primary aged children not collected from school at the end of the school day and the role of the designated safeguarding lead (DSL). They must also read and understand the individual schools' 'Child Protection and Safeguarding Procedures' documents.
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment. Staff should share concerns as soon as possible regardless of whether a

child is open to Children's Services or not and regardless of the level of any involvement.

- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, Sexual Violence and Sexual Harassment, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), child criminal exploitation (CCE), FGM, radicalisation, serious violent crime, criminal exploitation, serious youth crime, peer on peer abuse including, sexual violence and sexual harassment.
- When to identify children's mental health and when it becomes a safeguarding concern
- To be aware of the potential for children to be exploited when missing education.

Section 12 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## **5.2 The designated safeguarding lead (DSL)**

Each school DSL is a member of the senior leadership team and is named in the school's safeguarding procedures document which will form an appendix to this document. The DSL takes lead responsibility for child protection and wider safeguarding. The DSL is responsible for tracking the educational progress of pupils who may be the subject of a referral to an outside agency or child protection plan (CIN or CP) and looked after or previously looked after pupils.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The details of how the DSL can be contacted out of school hours if necessary will be published in each school's procedures document.

When the DSL is absent, the deputy safeguarding leads will act as cover. School deputy SLs are named in each school's procedures document.

If the DSL and deputies are not available the CEO will act as cover (for example, during out-of-hours/out-of-term activities). However, staff will be aware of the need to contact police or children's services directly should there be an emergency as set out in **7.1** of this policy.

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 strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

- To know what to do if concerns about staff, including supply staff. (reflects the responsibility schools have to fully explore concerns about supply staff Part 4 KCSiE 2021)
- Track the educational progress of identified pupils liaising with class teachers
- Lead on any case involving sexual violence or sexual harassment. This includes reporting appropriately, liaising with the police and social care where necessary and providing robust risk assessments for the victim/s and alleged perpetrator/s post disclosure.

The DSL will also keep the headteacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

The full responsibilities and duties of the DSL and deputies are set out in their job descriptions.

### **5.3 The Trustee Board and Local Governing Body**

The Board of Trustees has strategic leadership responsibility for the Trust policy. At each review, they ensure it complies with the law and hold the TL to account for its implementation across the Trust schools.

Each Local Governing Board (LGB) will appoint a board level lead to monitor the effectiveness of this policy and school procedures in conjunction with the full governing board. This is always a different person from the DSL. The Board of Trustees will appoint a Link Trustee to monitor the effectiveness of this policy in conjunction with the local board level lead. The Safeguarding Link Trustee will be named on each school's own safeguarding procedures.

The Chair of the LGB will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher (see appendix 3). The CEO must be informed as soon as possible where there has been an allegation against a member of staff, a headteacher or member of the local governing body. The Chair of Trustees will act as the 'case manager' in the event that an allegation of abuse is made against an executive headteacher, the CEO, a member of the Executive and Central Team or a member of the local governing board. Should there be an allegation against a member of the Trust Board, the person making the allegation should contact the local area Designated Office (DO). The details of which will be on each school's own procedures.

All governors and all staff will read Part one of the most up to date Keeping Children Safe in Education.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/1014057/KCSIE\\_2021\\_September.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1014057/KCSIE_2021_September.pdf)

Section 13 has information on how governors are supported to fulfil their role.

### **5.4 The Headteacher**

The headteacher is responsible for the implementation of this policy, to ensure it underpins all relevant policy and processes and the whole school procedures at school level including:

- Ensuring that staff (including temporary staff) and volunteers understand and follow this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

## **6. Confidentiality**

All staff will be made aware that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy) who may consult with the DPOfficer/Judicium
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3
- They have a duty to work within the regulations of GDPR and 7 Golden Rules of sharing information referring to the guidance as set out in section 2 above. They should seek advice from the DSL or Central Team if unsure whether a step to be taken is lawful.

## **7. Recognising abuse and taking action**

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

Please note – in this and subsequent sections, you should take any references to the DSL to mean “the DSL (or deputy DSL)”.

### **7.1 If a child is suffering or likely to suffer from harm, or in immediate danger**

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

You must tell the DSL (see section 5.2 and your school safeguarding procedures which are the individual school’s appendices to this policy) as soon as possible if you make a referral directly.

Direct referrals should be made according to the individual school safeguarding procedures which form an appendix to this policy. Schools must know and follow the local arrangements set by their safeguarding partners. The 3 safeguarding partners are listed in section 3 above (Definitions).

You can also follow this link: <https://www.gov.uk/report-child-abuse-to-local-council>

For concerns about a member of staff, see **7.6 below**.

### **7.2 If a child makes a disclosure to you**

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child’s own words. Stick to the facts, and do not put your own judgement on it. Use the school’s safeguarding cause for concern sheet which will be attached to the school procedures document.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so

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

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

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow the local safeguarding procedures as set out in each school's procedures document.

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

Figure 1 on page 10 illustrates the procedure to follow if you have concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, speak to a member of the senior leadership team and/or take advice from local authority children's social care.

You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

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

#### **Early help**

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

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

Each school's safeguarding procedures document will contain details of the local procedures for early help.

### **Referral**

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

Each school's safeguarding procedures document will contain details of the procedures for referral and escalation.

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

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

If in exceptional circumstances the DSL is not available, speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above).

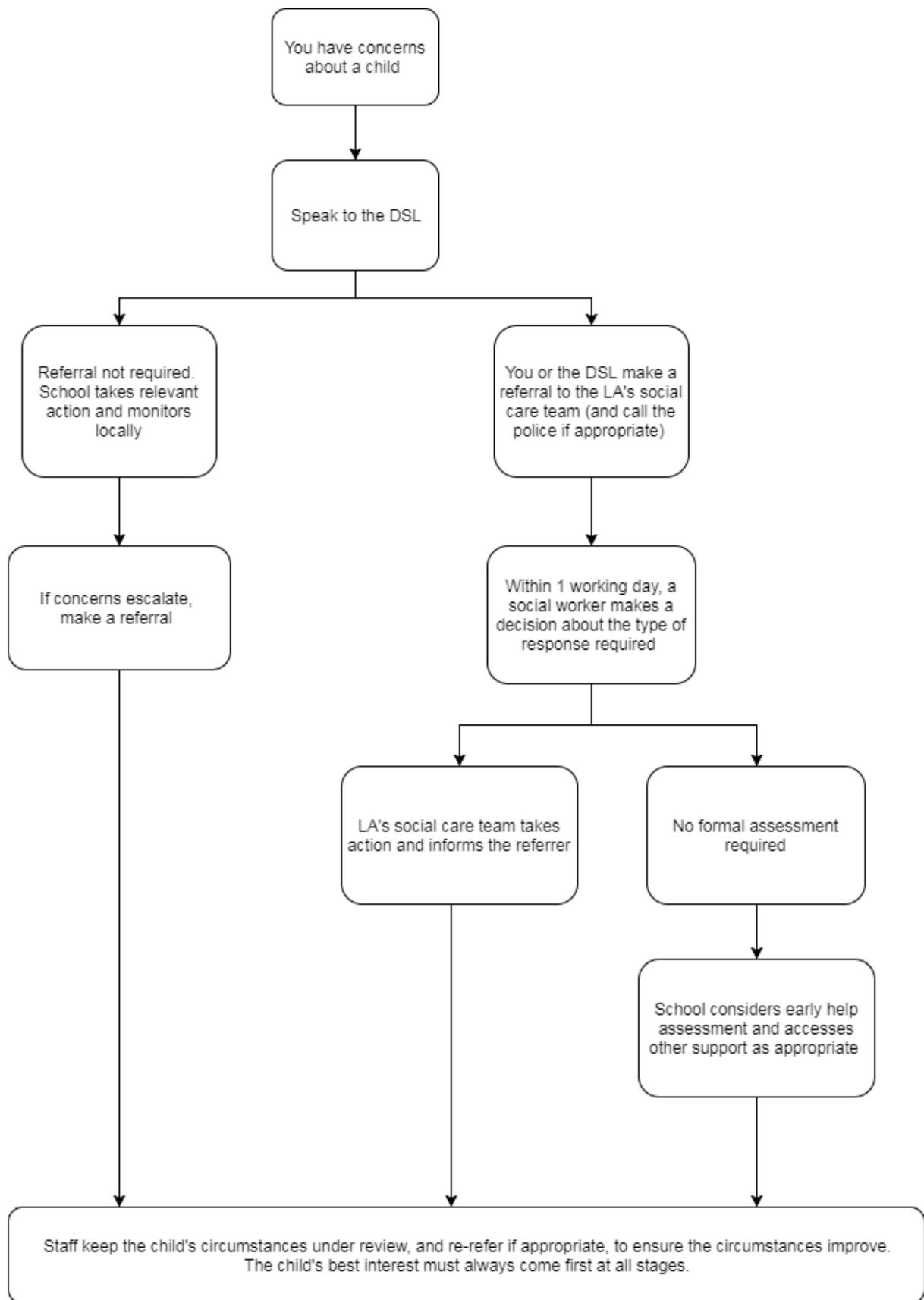
Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care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

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

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

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

**Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger), including dealing with concerns which do not meet the harm threshold, inside and outside the school.**



## 7.6 Allegations against or concerns about a staff member or volunteer

If you have concerns about a member of staff, supply staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the chair of the local governing board who will act as case manager, but the CEO must be informed of concerns about any member of staff.

Concerns may be those around a member of staff's ability to carry out their role without putting children's safety and wellbeing at risk due to, for example, taking certain medications. In such instances, the member of staff and headteacher will follow the Ivy Code of Conduct and the school's Health and Safety procedures to protect both staff and children.

### Low Level Concerns

These are concerns that may be reported from a number of sources both inside and outside the school. Behaviours that raise a concern but may not meet the harm threshold are:

- inconsistent with the Ivy Staff Code of Conduct, including inappropriate conduct outside of work and
- do not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of behaviours could include:

- being over friendly with children;
- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or;
- using inappropriate sexualised, intimidating or offensive language.

Members of staff will be made aware of the low-level concern procedure to ensure they report any such behaviour with the right person, be recorded and dealt with appropriately. This process should protect those working in or behalf of schools from potential false allegations or misunderstandings

The headteacher/chair of governors/DSL will then follow the procedures set out in appendix 3, if appropriate. This also applies to allegations made against supply staff. The headteacher must follow through the school's procedures as they would with a contracted member of staff to ensure allegations are dealt with appropriately.

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

### **7.7 Allegations of abuse made against other pupils**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up".

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously.

Where reports of sexual violence or sexual harassment are made, the school will act in accordance with Part 5 of Keeping Children Safe in Education (2021)

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being 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
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially – each school will publish details on this in their local procedures documents
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Ensuring that schools follow the DfE guidance 'Teaching online safety in school'.  
<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

## **7.8 Sexting (nudes or semi-nudes)**

This is a suggested approach based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff.

This meeting will consider the initial evidence and aim to determine:

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

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

### **Informing parents**

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

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through either the local neighbourhood police, police community support or a safer schools officer – each individual school will highlight the process within their individual safeguarding procedures document.

### **Recording incidents**

All incidents, involving alleged sexual violence, harassment and sexting, and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording such incidents.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE education and computing e-safety and anti-bullying programmes. Each school will share how sexting is covered in the curriculum through their local safeguarding procedures documents. The Relationship, Sex and Health Education Policy will cover safety in healthy relationships, and the Computing curriculum will address cyber-bullying where appropriate.

## **8. Notifying parents**

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

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

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

Staff will be trained to understand circumstances that may make it difficult for victims to report incidents of abuse. For example, this may be the case if the alleged abuser is a close relation.

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

## **9. Pupils with special educational needs and/or disabilities (SEND)**

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEND. Each school will include details of what is offered within their local safeguarding procedures document.

## **10. Mobile phones and cameras and the digital world**

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

Early Years staff must lock away their phones and personal cameras or tablets whilst children are on the premises.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

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

All staff, parents and children will sign and follow the 'Acceptable Usage' document relating to the safe use of mobile and other electronic devices, the internet and social media.

Staff will follow their school's E-Safety Procedures document.

## **11. Complaints and concerns about school safeguarding practices**

### **11.1 Complaints against staff**

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

### **11.2 Other complaints**

Other complaints relating to the safeguarding of pupils, including those about unsafe premises, will be dealt with as set out in the Ivy Complaints Procedure and as set out in this Safeguarding Policy and the school procedures.

Early Years complaints will be dealt with as determined in the Statutory Framework for the Early Years Foundation Stage, including the keeping of written records of any complaints and their outcome, notification to the complainant of an outcome of investigation within 28 days of receipt and making the record available to OFSTED on request.

### **11.3 Whistle-blowing**

Staff will follow the Ivy Whistle-blowing policy with regards to concerns about the school's safeguarding procedures, including poor or unsafe practice or potential failures.

Whistleblowing in the Early Years will be dealt with as determined in the Statutory Framework for the Early Years Foundation Stage.

## **12. Record-keeping**

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on the school's system. (Most Ivy schools use CPOMs). If you are in any doubt about whether to record something, discuss it with the DSL.

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

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

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. 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 safety of the child.

Each school will set out its procedures for record-keeping in its school safeguarding procedures, including detail on:

- whether records paper-based or electronic
- Where records are held
- How records are kept secure
- How long the information is retained for
- How records are kept confidential when appropriate
- How each school shares information with other agencies

In addition:

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

## **13. Training and Support**

### **13.1 All staff**

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

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

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

Volunteers will receive appropriate training, where applicable.

Training will include practical examples of 'safe touch' and where necessary (i.e for children with particular needs or disabilities) staff will follow an Intimate Care Policy drawn by the school and the parents.

### **13.2 The DSL and Deputies**

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

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

### **13.3 Governors**

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

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

### **13.4 Recruitment – interview/appointment panels**

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

### **13.5 Staff who have contact with pupils and families**

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

Staff involved with a child who has suffered harm, or appears to be likely to suffer harm, will be supported by having the opportunity to talk through their anxieties with the Headteacher or designated lead and will be helped to seek further support as appropriate.

## **14. Monitoring arrangements**

This policy will be reviewed **annually** by the Chair of Trustees and Safeguarding Trustee (Deborah Thompson and Alison Bowman). At every review, it will be approved by the full Board of Trustees.

## **15. Links with other policies**

This policy links to the following policies and procedures:

- Anti-bullying
- Behaviour, including the schools' Covid 19 Addendum
- Staff Code of Conduct
- Complaints
- Health and safety
- Attendance
- SEND Information and Policy
- E- safety and Acceptable Usage
- Relationship, Sex and Health Education
- First aid
- Curriculum
- Whistle-blowing
- Parent Code of Conduct
- Governor Code of Conduct
- Attendance Policy
- Swimming Policy
- School safeguarding procedures, including Covid 19 Addendum

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

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

**Sexual abuse** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether 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
- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). This also includes 'upskirting' which is typically when a photograph is taken under a person's clothing without them knowing.

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

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

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

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

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

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

## **Appendix 2: safer recruitment and DBS checks – policy and procedures**

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

### **New staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

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

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before an interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

It is an offence for an applicant to apply for a role if they are barred from engaging in regulated activity relevant to children.

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

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

### **Existing staff**

All members of staff are asked to sign an annual declaration that there has been no change to their suitability to work with children.

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

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

- The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm)
- The individual has received a caution or conviction for a relevant offence, or if there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### **Staff moving between schools**

If an existing member of staff moves between Ivy schools, the head of the current school will confirm in writing that, as far as they are aware, there is no additional information to be taken into account alongside their existing DBS certificate. The member of staff will also be asked to sign the Declaration Form for transfers between schools. Both these documents will then be sent to Enfield Schools Personnel, alongside the Videpay.

### **Background checks on regular visitors and volunteers**

Regular visitors will be required to complete all the same checks as a directly-employed member of staff and this will be recorded on the single central record.

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

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

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

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

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. When we decide that an

individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### **Trainee/student teachers**

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

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

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

### **Governors**

All trustees, local governors and members will have an enhanced DBS check without barred list information, and will also have a section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). *[Section 128 checks are only required for local governors if they have been delegated any management responsibilities.]* The DBS of any Ivy school based governors will stand. The head from the governor's school will put in writing that there is no additional information to be taken into account alongside the member of staff's existing DBS certificate

They will have an enhanced DBS check with barred list information if working in regulated activity.

The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors, trustees, local governors, excluding Ivy school based staff (this will be recorded on each school's information on the Single Central Record on ScholarPack) and members will also have the following checks:

- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

When we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform. The DSL will undertake a visit to the setting and record this information on the pupil's records.

### **Adults who supervise pupils on work experience**

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm. Each school will assign a senior member of staff as the link contact between the student and the student's own school.

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

A risk assessment will be undertaken for any staff member whilst a DBS is pending.

### **Appendix 3: allegations of abuse made against staff**

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

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher or support staff who are no longer employed at the school and there are historical allegations of abuse will be referred to the police.

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

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

#### **Suspension**

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

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

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

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

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

- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative from the school to keep them informed of the

progress of the case and consider what other support is appropriate. The individual will be encouraged to seek advice from trade union representatives or colleagues, and welfare, medical or counselling advice will be recommended where appropriate.

- Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

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

### **Timescales**

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

### **Specific actions**

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

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

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

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

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

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

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

### **Unsubstantiated or malicious allegations**

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

### **Trust Covid Arrangements**

In the case of a class or school closure, senior leaders will follow advice from Public Health England and local Outbreak Plans.

All schools in the Trust will follow up dated advice from Enfield and Hertfordshire local authorities. Number of respective LADOs easily accessible in all schools open. Staff have been given relevant numbers to safeguarding teams: the MASH and MARF contact details.

All schools will receive updated information for raising concerns whether on or off site. In most cases this still follows the schools' current procedures pre-Covid 19 lock down.

Identified staff have responsibility to contact all pupils on a Child Protection Plan and speak to parent/care and child in the event of being asked to self isolate or following a positive test.

All calls are logged on the schools' on-line system to monitor regularity of contact.

This is also the case with P/LAC pupils and those with an EHCP (or pending EHCP) and those each school deems 'vulnerable'. This will be unique to each setting using the Trust criteria.

The Head of School Improvement and Standards will contact the headteacher of each school regularly to discuss any safeguarding concerns that may have arisen case by case in the event of a partial closure. The Chair of the Trust, Trust Leader and Chief Operation Officer are updated regularly.

Peer on peer abuse - given the different circumstances schools would be operating in a partial shutdown, a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach)

Where staff have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)

Schools will ensure on-line resources are relevant and age appropriate linked to curriculum planning. The schools' E-safety systems still apply where concerns have been raised.

All Trustees, leaders and staff are updated with any new procedure and the current appendix to the policy is kept up to date as it is revised. The revised policy should continue to be made available publicly.

### **Confidentiality**

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

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

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

## **Record-keeping**

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

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

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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

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

## **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

## **Learning lessons**

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

This will include consideration of (as applicable):

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

## **Appendix 4: specific safeguarding issues**

### **Children missing from education**

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

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

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

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

### **Covid Additional Information 2021**

The procedures for off rolling pupils will be in the context of any current Covid situation. Schools will inform the Education Welfare Officers when families have not been contacted successfully. Pupils will not be off rolled until all procedures have been followed.

### **How to spot signs of abuse**

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

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

## **Human trafficking or modern day slavery**

Slavery can be linked to a number of safeguarding issues, including child sexual exploitation, but normally includes at least one of the following specific situations:

- Child trafficking – young people being moved internationally or domestically so that they can be exploited.
- Forced labour – victims are forced to work through physical or mental threat, against their will, often very long hours for little or no pay, in conditions that can affect their physical and mental health. They are often subjected to verbal or physical threats of violence against them as individuals or their families.
- Debt bondage – victims forced to work to pay off debts that they will never be able to. Debts can be passed down to children. Extreme examples include where a victim may be owned or controlled by an ‘employer’ or sold as a commodity.

## **Signs and Indicators**

Possible signs and indicators that someone is a victim of modern slavery that anyone working with children and young people should be aware of include:

- Physical appearance – poor physical condition, malnourishment, untreated injuries, and looking neglected.
- Isolation – victims may not be allowed out on their own and may appear to be under the control or influence of people accompanying them, with the absence of a parent or legal guardian. They may not interact and be unfamiliar in their local community.
- Poor living conditions – victims may be living in dirty, cramped or overcrowded accommodation, with multiple children living and working at the same address/premises.
- Personal belongings – few possessions, wearing the same clothes each day, and no identification documents.
- Restricted Freedom – victims have little opportunity to move freely and may be kept from having access to their passport.
- Unusual travel times – victims may be dropped off or collected from work on a regular basis either very early or late at night.
- Reluctant to seek help – victims may avoid eye contact, appear frightened or hesitant to approach people and have a lack of trust or concern about making a report should they be deported or fear of violence on their family.

## **Child sexual exploitation**

Child sexual exploitation (CSE) is a form of child sexual abuse that occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator.

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

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

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

Indicators of sexual exploitation can include a child:

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

Child Criminal Exploitation (CCE)

Specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing.

Children can be trapped into this type of exploitation due to perpetrators threatening their families. With violence. They may also be coerced into carrying weapons. Vulnerabilities may not always be recognised by adults and professionals and they may not be treated as victims. Consent is not an admittance but may be part of the exploitation.

Girls' experience of this type of exploitation may be different to boys, Indicators may not be the same. Both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

<https://www.gov.uk/government/publications/child-sexual-exploitation-definition-and-guide-for-practitioners>

### **Sexual violence and sexual Harassment between children**

Children who are the victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all **likelihood, adversely** affect their educational attainment. Incidents may overlap and can occur online and offline. Any report of sexual violence and sexual harassment will be taken seriously. The victim will not be made to feel the reporting is creating a problem.

Staff will be aware that it is more likely that girls will be the victims of sexual violence and sexual harassment and will more likely be perpetrated by boys. However, it is important to note boys and transitioning children may well be the victims in some cases.

## **Homelessness**

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

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

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

## **So-called 'honour-based' violence (including FGM and forced marriage)**

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

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

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

## **FGM**

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

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
  - Having a mother, older sibling or cousin who has undergone FGM
  - Having limited level of integration within UK society
  - Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
  - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
  - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
  - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
  - Being unexpectedly absent from school
  - Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

### **Forced marriage**

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

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

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

The DSL will:

- Speak to the pupil about the concerns in a secure and private place

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

## **Preventing radicalisation**

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

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

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

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

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

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

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

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

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

If a child is not collected at the end of the session/day, we will follow the policy set out in Policy and procedures for primary aged children not collected from school at the end of the school day and this will be reflected in our school safeguarding procedures document.

### **Missing pupils**

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow guidance as set out in each school's procedures for children who go missing whilst in school care. This will include

the names of key members of staff and their responsibilities (such as calling the police and parents) and the need for risk assessments before school trips. The Headteacher, Executive Head, or CEO if no executive, must be informed of cases of missing children at the soonest opportunity.

## **Appendix 5: Individual School Local Safeguarding Procedures**

- 5a Brimsdown Primary School
- 5b Churchfield Primary School
- 5c Eastfield Primary School
- 5d Larkspur Primary Academy
- 5e Lavender Primary School
- 5f Walker Primary School
- 5g The Wroxham Primary School
- 5h Woodside Primary School
- 5i Crabtree Junior School
- 5j Crabtree Infant School

## Appendix 6 COVID-19 annex

Among other things the annex/ addendum should reflect:

- any updated advice received from the local 3 safeguarding partners
- any updated advice received from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need
- what staff and volunteers should do if they have any concerns about a child
- the continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns
- DSL (and deputy) arrangements
- the continued importance for school and trust staff to work with and support children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children
- peer on peer abuse - given the very different circumstances schools and trust are operating in a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach)
- what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)
- any arrangements to support children the school or trust are concerned about who do not meet the 'vulnerable' definition
- what arrangements are in place to keep children not physically attending the school especially online and how concerns about these children should be progressed

### **Dedicated Safeguarding Lead (DSL)**

The optimal scenario for any school providing care for children is to have a trained DSL or deputy available on site. It is recognised this may not be possible, and where this is the case there are 2 options to consider:

- a trained DSL or deputy from the school or trust can be available to be contacted via phone or online video - for example working from home
- sharing trained DSLs or deputies with other schools across the trust (who should be available to be contacted via phone or online video).

### **Children moving schools and colleges**

It will be important for any school or college whose children are attending another setting to do whatever they reasonably can to provide the receiving institution with any relevant welfare and child protection information. This will be especially important where children are vulnerable.

### **Safer recruitment/ volunteers and movement of staff**

In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its guidance on standard and enhanced DBS ID checking to minimise the need for face-to-face contact.

Where schools and trusts are utilising volunteers, they should continue to follow the checking and risk assessment process as set out in paragraphs 167 to 172 of KCSIE. Please note that under no

circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

### **Online safety away from school**

The department is providing separate guidance on providing education remotely. It will set out 4 key areas that leaders should consider as part of any remote learning strategy. This includes the use of technology. Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) could help plan online lessons and/or activities and plan them safely.

Schools and trusts should ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online.

Schools are likely to be in regular contact with parents and carers. Please consider how these communications can be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school (if anyone) their child is going to be interacting with online.

## **COVID-19 on vulnerable children and young people - UPDATED**

The DfE Updated the following sections of the [guidance](#): 13, 20, 21, 22, 24, 26, 27 and 30.

These sections primarily relate to:

- Children with an education, health and care (EHC) plan; and
- Special schools; and
- Alternative Provision.

Sections 20 through to 22 now provide greater clarity that where pupils with EHC plans can safely remain at home, they should. Schools and local authorities need to consider the needs of all children and young people with an EHC plan, alongside the views of their parents, and make a risk assessment for each child or young person.

Sections 23 to 30 provide greater clarity about special schools and specialist provision. Where a child or young person requires ongoing provision, this may continue to be provided at their current special school or specialist college, but not always. Local authorities, schools and colleges, working together and taking into account parents' views, will need to make decisions regarding the provision required to meet the needs of children and young people in their area.

Section 31 relates to Alternative Provision (AP). A greater concentration of children in AP meet the definition of vulnerable children – many AP pupils have a social worker and/or are children with EHC

plans. Local arrangements are therefore required in order to determine the best way to protect this group of vulnerable children.

**COVID-19 guidance about what to do during a covid outbreak and temporary closures –**

<https://www.gov.uk/government/publications/actions-for-schools-during-the-coronavirus-outbreak>