

# Child Protection and Safeguarding Policy Telford and Wrekin



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## 1. Policy Statement and Principles

This policy is one of a series in the school's integrated safeguarding portfolio. The Designated Safeguarding Lead (DSL) works alongside the Safeguarding Governor and Deputy Designated Safeguarding Leads (DDSLs) to ensure that the procedures cited in this policy are followed by all members of the school community, including visitors to the school.

The DDSLs are all fully trained in safeguarding procedures. They support the DSL in responding to safeguarding concerns, including making initial referrals to Children's Social Care, attending a range of safeguarding meetings and supporting vulnerable pupils in school hours. Just like the DSL, their safeguarding responsibilities are clearly outlined in their job descriptions.

Other documents which relate to safeguarding include: Staff Code of Conduct (Behaviour Policy), Safer Recruitment Policy, Allegations against Staff procedure, Children Missing Education procedures, Complaints procedure, Behaviour and Anti-Bullying Policy and Online Safety Policy.

The school's safeguarding arrangements are inspected by Ofsted under the judgements for leadership & management and also impact the judgement on the personal development, behaviour and attitudes of children and learners.

This policy is available on the school website, via a link to the Community Academy Trust website, and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school.

### Child Protection Statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice. Everyone should consider, at all times, what is in the best interest for the child.

The procedures contained in this policy apply to all staff, volunteers and governors and are consistent with statutory guidance and the locally agreed multi-agency safeguarding arrangements put in place by Telford and Wrekin Safeguarding Partnership (TWSP).

## 2. Safeguarding Legislation and Guidance

At this school we understand our duties under Section 11 of the Children Act 2004 and Section 175 and 157 of the Education Act 2002.

We adhere to [Working together to safeguard children, 2018](#) and [Keeping Children Safe in Education, 2019](#) (KCSiE).

This policy has been developed in line with legal obligations, including the Human Rights Act 1998, the Equality Act 2010 and the Public Sector Equality Duty.

All child protection matters will be dealt with in line with Telford and Wrekin Safeguarding Partnership (TWSP) West Midlands Child Protection and Safeguarding Procedures Manual.

Unless otherwise specified:

- ‘school’ means: all schools whether maintained, non-maintained or independent schools (including academies, free schools and alternative provision academies), maintained nursery schools and pupil referral units.
- ‘college’ means further education colleges and sixth-form colleges as established under the Further and Higher Education Act 1992 and institutions designated as being within the further education sector. It relates to their responsibilities towards children who are receiving education or training at the college. It excludes 16-19 academies and free schools (which are required to comply with relevant safeguarding legislation by virtue of their funding agreement).

The school’s duty of care is in line with Government legislation and [local Telford & Wrekin Safeguarding Partnership \(TWSP\) Procedures](#).

The safety and protection of all children is of paramount importance to all those involved in education. For avoidance of doubt the role of governing bodies, boards and proprietors of all schools is set out in *Keeping Children Safe in Education*, 2019, (KCSiE). This guidance, coupled with *Working Together to Safeguard Children*, 2018, is the blueprint for all inter agency working and should be available and accessible to all those responsible for children’s welfare. The Governing Body will ensure that all staff read at least **Part One and Annex A of KCSiE** and sign to confirm that they have read and understood this, although best practice would be for all staff to be acquainted with all sections of KCSiE. The school will maintain a record of all those who have read Part 1 and Annex A.

Our school community believes that we should provide a caring, positive, safe and stimulating environment which promotes the social, physical and moral development of the individual child and as such, we follow the Department for Education advice *What to do if you’re worried a child is being abused*.

### 3. Safeguarding Awareness

For the purpose of this policy, safeguarding and promoting the welfare of children\* is defined as:

- 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; and
- taking action to enable all children to have the best outcomes.

\*Children includes everyone under the age of 18.

No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action.

Children often develop close relationships with the members of the school community and can view them as significant and trustworthy individuals. For the purpose of this policy and for avoidance of doubt, the school community includes, parents, other children and all those that work or volunteer at the education setting.

Primary responsibility for the care and protection of children rests with parents, but a range of services is available to help them in this task. Parents need to be in no doubt that this policy is our commitment towards the Child Protection Statement above and we expect that they embrace everything that is documented in our policy. In principle, parents sign up to our school ethos, as well as the law and the legislation that underpins it.

This school is committed to identifying children who may benefit from early help as soon as a problem emerges. Our staff maintain the attitude of ‘it could happen here’ where safeguarding is concerned. Staff must always act in children’s best interest where they are concerned about a child’s welfare.

Our school believes that the safety, welfare and protection of all children is paramount and any delay in reporting concerns is unacceptable. All staff will adhere to this principle and the child protection procedures established by the TWSP and the underlying principles that lie within it.

This policy is available on the school website, via a link to the Community Academy Trust website, and all staff and volunteers are required to read it and confirm they have done so in writing before commencing work in school.

The Designated Safeguarding Lead’s (DSL) role and that of their deputy DSLs, is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All staff (paid or voluntary) will receive a robust induction to help them fully understand the systems for safeguarding. In addition to this policy, staff will be familiar with our Behaviour Policy, Staff Code of Conduct, how to respond to children going missing and the role of the DSL. All staff receive appropriate child protection and safeguarding training for their role.

Staff members know that they must never promise a child to not tell anyone about a report of abuse, as this may not be in the best interests of the child.

## Early Help

In our school we believe that any child may benefit from early help and we ensure that all staff are alert to the potential need for early help for a child who:

- is disabled and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- is a young carer;
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking or exploitation;
- is at risk of being radicalised or exploited;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is a privately fostered child.

## Abuse and neglect

All of our staff members are trained on the indicators of abuse and neglect to help them identify children who may be in need of help or protection. We believe that abuse, neglect and other safeguarding issues are rarely stand-alone events.

## Recognising abuse

To ensure that our pupils are protected from harm, we need to understand what types of behaviour constitute abuse and neglect.

Abuse and neglect are forms of maltreatment of children. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by adult men or women or by other children or young people. Staff are trained to understand and recognise indicators of all four categories of abuse as defined below.

**There are four categories of abuse: physical abuse, emotional abuse, sexual abuse and neglect.**

## Physical abuse

Physical abuse is a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. This used to be called Munchausen's Syndrome by Proxy, but is now more usually referred to as fabricated or induced illness.

The fabrication of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness, it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to

keep an open mind to ensure that they have not missed ‘a vital piece of information’. This school will adopt the guidance [Safeguarding children in whom illness is fabricated or induced](#).

## Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyber bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

## Sexual abuse

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. They may also include 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. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education (See Peer on Peer Abuse below).

## Neglect

Neglect is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in the serious impairment of the child’s health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

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

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

Definitions taken from *Keeping Children Safe in Education* (DfE, 2019).

## Indicators of abuse

Physical signs define some types of abuse, for example bruising, bleeding or broken bones resulting from physical or sexual abuse, or injuries sustained while a child has been inadequately supervised. The identification of physical signs is complicated, as children may go to great lengths to hide injuries, often because they are ashamed or embarrassed, or their abuser has threatened further violence or trauma if they 'tell'. It is also quite difficult for anyone without medical training to categorise injuries into accidental or deliberate with any degree of certainty. For those reasons it is vital that staff are also aware of the range of behavioural indicators of abuse and report any concerns to the Designated Safeguarding Lead.

**It is the responsibility of staff to report their concerns. It is not their responsibility to investigate or decide whether a child has been abused.**

A child who is being abused or neglected may:

- have bruises, bleeding, burns, fractures or other injuries;
- show signs of pain or discomfort;
- keep arms and legs covered, even in warm weather;
- be concerned about changing for PE or swimming;
- look unkempt and uncared for;
- change their eating habits;
- have difficulty in making or sustaining friendships;
- appear fearful;
- be reckless with regard to their own or other's safety;
- self-harm;
- frequently miss school or arrive late;
- show signs of not wanting to go home;
- display a change in behaviour - from quiet to aggressive, or happy-go-lucky to withdrawn;
- challenge authority;
- become disinterested in their school work;
- be constantly tired or preoccupied;
- be wary of physical contact;
- be involved in, or particularly knowledgeable about drugs or alcohol;
- display sexual knowledge or behaviour beyond that normally expected for their age and/or stage of development;
- acquire gifts such as money or a mobile phone from new 'friends' or adults recently acquainted with the child's family.

Individual indicators will rarely, in isolation, provide conclusive evidence of abuse. They should be viewed as part of a jigsaw and each small piece of information will help the DSL to decide how to proceed.

**It is very important that staff report all of their concerns, however minor or insignificant they may think they are - they do not need 'absolute proof' that the child is at risk.**

## Impact of abuse

The impact of child abuse, neglect and exploitation should not be underestimated. Many children do recover well and go on to lead healthy, happy and productive lives, although most adult survivors agree that the emotional scars remain, however well buried. For some children, full recovery is beyond their reach and the rest of their childhood and their adulthood may be characterised by anxiety or depression, self-harm, eating disorders, alcohol and substance misuse, unequal and destructive relationships and long-term medical or psychiatric difficulties.

## 4. Specific Safeguarding Issues

All staff are trained to identify a range of safeguarding issues that can put children at risk of harm including risks such as peer on peer abuse, Child Sexual Exploitation, Child Criminal Exploitation and homelessness. These issues and some others are outlined below.

### Peer on peer abuse

All staff are trained to understand that children can abuse other children. This is known as peer on peer abuse.

All staff are made aware of the wider safeguarding issues children may face and know how to escalate any concerns appropriately.

### Children and the court system

This school recognises that sometimes children are required to give evidence in criminal courts, for crimes committed against them or for other crimes they have witnessed. We will follow the age appropriate guides to support children [5-11 year-olds](#) and [12-17 year-olds](#). This will ensure that the correct process is followed and that support and special measures are made available.

Making child arrangements via the family courts following separation can entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool, [guidance of the Ministry of Justice](#), which provides clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### Children missing from education

Where children have gone missing we will follow the [Local Missing Children Process](#).

All staff members are aware that children going missing, particularly repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage. We will use early help strategies if necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks of a child going missing in future.

## Children with family members in prison

Approximately 200,000 children have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation and poor mental health. The school will seek to support pupils in this position through pastoral care, early help and discussions with parents/carers and other family members as appropriate. We will use the information from [NICCO](#), to help mitigate negative consequences for those children.

## Child Sexual Exploitation (CSE)

This school recognises child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact: it can also occur through the use of technology. Like all forms of child sex abuse, child sexual exploitation:

- can affect any child or young person (male or female) under the age of 18 years, including 16 and 17 year olds who can legally consent to have sex;
- can still be abuse even if the sexual activity appears consensual;
- can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity;
- can take place in person or via technology, or a combination of both;
- can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence;
- may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media);
- can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse; and
- is typified by some form of power imbalance in favour of those perpetrating the abuse. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

Some of the following signs may be indicators of child sexual exploitation:

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

If we feel that children may be being abused through exploitation we will consult in the normal way with the multi-agency safeguarding hub Family Connect and seek advice as to whether the incident follows a [CSE Care Support Pathway](#). The concerns will be followed through sensitively and appropriately with fellow professionals and the [CATE Referral Form](#) will be completed. In relation to the fortnightly CATE Risk Panels, where concerns are expressed around a child attending our school, we will ensure attendance whenever possible as part of the established multi-agency process. Alongside this, we have taken the same steps and made all staff aware of the TWSP [CSE Warning Signs Checklist](#). Due to the high number of reports in our borough, we will be particularly alert to CSE.

### Child Criminal Exploitation (CCE): ‘County Lines’

We recognise that the vast majority of young people will not be affected by serious violence or gangs. However, if these problems do occur there will almost certainly be a significant impact.

We follow the Home Office guidance for [Preventing youth violence and gang involvement practical advice for schools and colleges](#) which provides information regarding understanding the issue, seeking support, working with local partners, early help and legal powers for our staff. We take seriously our duty and responsibility to protect our students and staff and we recognise dealing with violence also helps attainment.

Our school recognises criminal exploitation of children is a geographically widespread form of harm that is a typical feature of ‘county lines’ criminal activity, whereby drugs networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. We recognise that the key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Should we suspect this we will refer to the multi-agency safeguarding hub Family Connect and to the [National Referral Mechanism](#).

In respect of the above we will ensure that students:

- feel safe in our setting;
- understand very clearly what safe situations are;
- are aware of how to keep themselves and others safe;

Staff members will also:

- monitor thoroughly missing episodes;
- understand that any child of any age and gender may be vulnerable to grooming activity by others of any age and gender;
- be aware that it is exploitation even if consensual; and,
- be aware that it may be typified by a form of power imbalance.

We recognise that child criminal exploitation can take a number of forms.

### Modern slavery and child human trafficking

We recognise modern slavery, including child trafficking as abuse. If we become aware or have suspicions that a child may have been, or is being, exploited or trafficked, we will contact Family Connect in the normal manner to seek advice and support. All children, irrespective of their immigration status, are entitled to safeguarding and protection under

the law. We recognise this as any normal child protection referral and potential victims of trafficking and modern slavery can be of any nationality including British children.

### Domestic abuse

Domestic abuse is defined as any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to:

- psychological;
- physical;
- sexual;
- financial;
- emotional.

We understand exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Domestic abuse affecting young people can also occur within their personal relationships, as well as in the context of their home life.

We will always liaise with agencies in a two-way process where domestic abuse and/or violence is a factor in a household. Children within our care will be appropriately supported. We are part of the Operation ENCOMPASS process where domestic incidents are shared directly with us, so that we have an initial awareness. To this end, we will be part of any agency referral, in a two-way process, such as the Domestic Violence Multi-agency Risk Assessment Conference (MARAC) and Multi Agency Public Protection Arrangements (MAPPA) or any other named agencies where these specific issues are a factor that may impair and/or impact on children's development.

### Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL (and deputies) refer any concerns to the *Local Housing Authority* so they can raise/progress concerns at the earliest opportunity. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into Children's Social Care where a child has been harmed or is at risk of harm.

In most cases school staff will be considering homelessness in the context of children who live with their families, and intervention will be on that basis. However, it should also be recognised that in some cases 16 and 17 year olds could be living independently from their parents or guardians, for example through their exclusion from the family home, and will require a different level of intervention and support. Children's services will be the lead agency for these young people and the DSL (or a deputy) will ensure appropriate referrals are made based on the child's circumstances. In these cases we will follow the department and the Ministry of Housing, Communities and Local Government joint

statutory guidance on the [provision of accommodation for 16 and 17 year olds who may be homeless and/ or require accommodation](#).

### **So-called ‘honour-based’ violence (including Female Genital Mutilation and Forced Marriage)**

So-called ‘honour-based’ violence (HBV) encompasses crimes which have been committed to protect or defend the honour of a family and/or community. Such crimes include Female Genital Mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving ‘honour’ often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Staff will be alert to the possibility of a child being at risk of HBV or already having suffered HBV.

All forms of so called HBV are abuse (regardless of the motivation) and staff will record and report any concerns about a child who might be at risk of HBV to the Designated Safeguarding Lead as with any other safeguarding concern. As appropriate, they will activate the local safeguarding procedures by contacting Family Connect and if necessary the police. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

### **Female Genital Mutilation (FGM)**

Female Genital Mutilation is a form of child abuse. It is the collective name given to a range of procedures involving the partial or total removal of the external female genitalia for non-medical reasons or other injury to the female genital organs. It has no health benefits and harms girls and women in many ways. The practice, which is most commonly carried out without anaesthetic, can cause intense pain and distress and long-term health consequences, including difficulties in childbirth.

FGM is carried out on girls of any age, from young babies to older teenagers and adult women, so school staff are trained to be aware of risk indicators. Many such procedures are carried out abroad and staff should be particularly alert to suspicions or concerns expressed by female pupils about going on a long holiday during the summer vacation period.

In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003. Any person found guilty of an offence under the Female Genital Mutilation Act 2003 is liable to a maximum penalty of 14 years’ imprisonment or a fine, or both.

As a school/college we will follow the National FGM Centre [Female Genital Mutilation: Guidance for schools](#).

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

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

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still discuss any such case with our DSL (or deputy) and involve children’s social care as appropriate. The duty does not apply in relation to those at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or in cases where the woman is 18 or over. In these cases, teachers will follow our local safeguarding procedures and report to Family Connect.

In respect of FGM we will adopt the local [TWSP FGM Practice Guidelines and Resource Pack](#) as part of safeguarding responsibilities and inform/educate our staff in this particular area.

### Forced Marriage

A forced marriage is a marriage in which a female (and sometimes a male) does not consent to the marriage but is coerced into it. Coercion may include physical, psychological, financial, sexual and emotional pressure. It may also involve physical or sexual violence and abuse.

A forced marriage is not the same as an arranged marriage. In an arranged marriage, which is common in several cultures, the families of both spouses take a leading role in arranging the marriage but the choice of whether or not to accept the arrangement remains with the prospective spouses.

Children may be married at a very young age, and well below the age of consent in England. School staff should be particularly alert to suspicions or concerns raised by a pupil about being taken abroad and not being allowed to return to England.

Since June 2014 forcing someone to marry has become a criminal offence in England and Wales under the Anti-Social Behaviour, Crime and Policing Act 2014.

We will follow the [Forced Marriage guidance](#). Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email [fmu@fco.gov.uk](mailto:fmu@fco.gov.uk)

### Preventing radicalisation

As a school we understand children are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

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

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

We accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media) and settings (such as the internet).

This school understands that it is, where possible, our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training, staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately. This includes reporting their concerns to the DSL/DDSL who will consider making a referral to the Channel programme.

## The Prevent Duty

As a school we are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as The Prevent Duty.

We see The Prevent Duty as part of our wider safeguarding obligation. The DSL, DDSLs and other strategic leaders are familiar with the revised Prevent Duty guidance: for England and Wales, especially paragraphs 57-76.

We follow the published advice for schools on the [Prevent duty](#) and ensure all staff access regular training on The Prevent Duty.

## Channel

This school recognises Channel as a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so.

We have procedures in place to monitor ICT usage and have a duty to seek advice and explore by filtering, any suspicious content being viewed. Those within and outside the school community should be left in no doubt of our duty to cooperate with the law.

If we feel children are being abused through extremism or being radicalised, we will consult directly with Family Connect and the police PREVENT team and seek advice. This is done with a [PREVENT referral form](#) (please see [the flowchart](#)). The PREVENT referral will be sent to Family Connect and the police. As with all referrals, this referral will be dealt with appropriately with professionals. If it is deemed from the PREVENT team that the

intervention is not criminal and does not warrant a Channel Panel, but needs local support, we will work with those professional leads for Telford & Wrekin Council. Presently they are **Paul Fenn and Jas Bedesha**. Our policy also recognises that the local police can be contacted in imminent circumstances on 01386 591835/591825 or 591816 and at [prevent@warwickshireandwestmercia.pnn.police.uk](mailto:prevent@warwickshireandwestmercia.pnn.police.uk).

## Sexual violence and sexual harassment between children

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

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

Our school will ensure that staff are aware of the importance of:

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

## Sexual violence

Our staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence, this policy uses the definitions of sexual offences in the Sexual Offences Act 2003 as follows:

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

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

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

## What is consent?

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

- a child under the age of 13 can never consent to any sexual activity;
- the age of consent is 16;
- sexual intercourse without consent is rape.

**Sexual harassment** in the context of peer on peer behaviour is unwanted conduct of a sexual nature that can occur online and offline. Sexual harassment is likely to:

- violate a child's dignity;
- make them feel intimidated, degraded or humiliated; and/or
- create a hostile, offensive or sexualised environment.

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- sexual "jokes" or taunting;
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:
  - non-consensual sharing of sexual images and videos;
  - sexualised online bullying;
  - unwanted sexual comments and messages, including, on social media;
  - sexual exploitation; coercion and threats; and
  - upskirting.

## Upskirting

'Upskirting' typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is now a criminal offence and may constitute sexual harassment.

## The response to a report of sexual violence or sexual harassment

We will always reassure victims that they are being taken seriously and that they will be supported and kept safe. We will never give a victim the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor will we make a victim feel ashamed for making a report.

If a staff member has a concern about a child or a child makes a report to them, as is always the case, they should speak to the DSL or a Deputy DSL, who will then consider the options to manage the concern, including:

- managing the issue internally;
- providing early help;
- referring to children's social care;
- reporting to the police.

We will follow the DfE guidance [Sexual violence and sexual harassment between children in schools and colleges: advice for governing bodies, proprietors, head teachers, principals, senior leadership teams and designated safeguarding leads.](#)

Where necessary for effective safeguarding we will utilise appropriate resources and seek support from established sources. We will consider and in some cases access the [Peer-on-peer abuse toolkit](#) to assist in our decision making and will also consider the [Brook traffic light tool](#). For an initial scoping we may consider the [TWSP Sexually harmful behaviour - risk assessment tool](#). We will, as necessary, seek advice on harmful sexual behaviours from the specialist sexual violence sector for a whole school approach. We will consult in the first instance with Family Connect for advice and support and seek advice around how best to deal with any issues.

In relation to sexting, also known as youth produced sexual imagery, we will, where necessary, consult with guidance produced by [The UK Council for Child Internet Safety \(UKCCIS\) Education Group Sexting in Schools and Colleges](#) and the DfE guidance [Searching, screening and confiscation](#). The DSL, or Deputy DSL, will take the lead on these issues.

## Contextual safeguarding

This school recognises that safeguarding incidents and unsafe behaviours can be associated with factors outside of school and can occur between children outside school. All staff, but especially our safeguarding leads, will consider the context within which such incidents or behaviours occur. We refer to this as contextual safeguarding, which simply means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare.

## 5. Our Response to Safeguarding Concerns

### What to do if you have concerns about a child

Where someone has a concern about the welfare of a children, wherever possible, there should be a conversation with the DSL (or Deputies), who will help staff to decide what to do next. Options include:

- managing any support for the child internally via the school’s own pastoral processes;
- an early help assessment;
- a referral for statutory services, for example, as the child is in need or suffering, or likely to suffer, significant harm. This will involve contacting Family Connect.

All referrals to Family Connect must be followed up in writing by completing a [request for service form](#) within 24 hours.

### Referral agencies

<b>Telford &amp; Wrekin</b>  <b>Family Connect</b> <b>01952 385385</b> <b>Out of Hours</b> <b>01952 676500</b>	<b>Shropshire</b>  <b>First Point of Contact</b> <b>0345 678 9021</b> <b>Out of Hours</b> <b>0345 6789040</b>	<b>Staffordshire</b>  <b>First Response</b> <b>0800 1313 126</b> <b>Out of Hours</b> <b>0345 604 2886 or 07815</b> <b>492613</b>
<b>If you think a child is in immediate danger, call the emergency services on 999</b>		
<b>Childline</b> <b>0800 1111</b>	<b>NSPCC</b> <b>0800 800 5000</b>	<b>Protecting Vulnerable People (West Mercia Police): 0300 333 3000</b>

### Immediate response to a child or parent

It is vital that our actions do not put a child at further risk of harm or prejudice an investigation. For example:

- listen to the child or parent; if you are shocked by what is being said, try not to show it;
- it is okay to observe injuries or bruises but not to ask a child or parent to remove their clothing to observe them;
- if a disclosure is made, the pace should be dictated by the child or parent, without them being pressed for detail or by asking leading questions such as, ‘What did he/she do next?’ or ‘Where did he/she touch you?’ It is our role to listen, not to investigate;
- we will use open questions, such as the ‘TED’ model of questioning; ‘tell’; ‘explain’ and ‘describe’;
- we will accept what the child or parent says. We will be careful not to burden them with guilt by asking, ‘Why didn’t you tell me before?’ or ‘Why did you let it happen?’;
- we will acknowledge how hard it was for them to disclose and reassure them that they have done the right thing by telling someone;

- we will never criticise the alleged perpetrator; the child or parent may care for them, but merely wish any abuse to stop;
- we will not promise confidentiality. Staff will explain who they have to tell, such as the DSL (or Deputies) and why and, depending on the child's age, what the next stage will be. It is important that staff members do not make promises that they cannot keep such as, 'I'll stay with you all the time' or "It will be all right now";
- if staff are not able to understand the communication method or language used by the child or parent they should seek assistance from an appropriate person to support them in receiving the disclosure.

If a child confides in a member of staff and requests that the information is kept secret, staff will tell the child sensitively that they have a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that child. Within that context, the child should, however, be reassured that this will be shared on a 'need to know' basis. If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings and away from any general areas, where that confidentiality may be compromised.

In exceptional circumstances where the DSL or Deputy DSLs are not available, this should not delay appropriate action being taken. Any action taken should be shared with the DSL or Deputy DSLs as soon as is reasonably practicable. Staff must never assume a colleague or another professional will take action and share information that might be critical in keeping children safe.

We will never allow fears about sharing information to stand in the way of the need to promote the welfare, and protect the safety of children. We expect concerns that arise in a morning to be reported to the DSL or a Deputy DSL by lunchtime that day at the very latest. Concerns that arise in an afternoon should be reported by, or as close as possible to, the end of the school day. Any concerns arising outside of the normal school day should be reported as quickly as possible. If in doubt, concerned parties should talk with the DSL or a Deputy DSL. In the unlikely event of the DSL or Deputy DSLs being unavailable, concerns for children's welfare must be reported to Family Connect. **Delay is unacceptable.**

Where safeguarding concerns are raised during an educational visit the DSL or Deputy DSLs must be notified without delay, even if they are not physically present at the site of the educational visit. They will liaise with the person responsible for the education visit to manage the concern and refer to the relevant agencies.

For staff to interpret any concerns this school will assess each incident as it appears. In respect of assessing any bruising to a child we will refer to the [Bruising of Children guidance produced by the TWSP](#) to assist in decision making.

We will work appropriately with each child, their family and other agencies to ensure the welfare of the child. We will work in partnership with, fulfil the ethos and abide by the principles of the [Telford and Wrekin threshold guidance](#). All school staff must be prepared to identify children who may benefit from early help. For avoidance of doubt, early help means this school will provide support as soon as a problem emerges at any point in a child's life from the foundation years up to adulthood.

Staff within this school may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional. Any such cases should

be kept under constant review and consideration given to a referral to children's social care assessment for statutory services if the child's situation does not appear to be improving or is getting worse.

Staff within this school will also be made aware of the process for making referrals to children's social care (Family Connect) and statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments. Also, staff will be made aware of the flowchart from KCSiE 2019, page 16, entitled 'Actions where there are concerns about a child'.

The school's role is to refer with the information received and **under no circumstances** become the investigator.

### Confidentiality

The personal information about all families is regarded by those who work in this school as confidential. All staff are aware of the confidential nature of personal information and will aim to maintain this confidentiality in all areas of the school.

Staff understand they need know only enough to prepare them to act with sensitivity to a child and to refer concerns appropriately. It is inappropriate to provide all staff with detailed information about the child, the incident, the family and the consequent actions.

### The role of the local authority

Within one working day of a referral being made, a local authority social worker should acknowledge receipt of the referral and make a decision about the next steps and the type of response that is required. This will include determining whether:

- the child requires immediate protection and urgent action is required;
- the child is in need, and should be assessed under section 17 of the Children Act 1989;
- there is reasonable cause to suspect the child is suffering or likely to suffer significant harm, and whether enquiries must be made and the child assessed under section 47 of the Children Act 1989;
- any services are required by the child and family and what type of services;
- further specialist assessments are required to help the local authority to decide what further action to take;
- to see the child as soon as possible if the decision is taken that the referral requires further assessment.

The referrer, even if they are not the DSL or a Deputy, will follow up if this information is not forthcoming.

If, after a referral, the child's situation does not appear to be improving, the school will consider following [local escalation procedures](#) to ensure our concerns have been addressed and, most importantly, that the child's situation improves.

### Record keeping

Anyone who has a concern or received a disclosure should follow these recording principles:

- make some brief handwritten notes at the time or immediately afterwards; record the date, time, place and context of disclosure or concern, recording facts and not assumptions, supposition or interpretation, and who you shared them;
- record where you spoke with the child or parent and personal safety details, such as 'I discussed the incident with the child in the headteacher's office with the door open' or justify if it was closed. If alone, explain that rationale by, for example, commenting, 'The child stated they would only confide in me if I was alone';
- if it is observation of bruising or an injury try to record detail, e.g. 'right arm, above elbow', 'bruise approximately 5cm in diameter noticed on back of lower right leg';
- note the non-verbal behaviour and the key words in the language used by the child or parent (try not to translate into 'proper terms' ensuring that you use the child or parent's own words). Body language should be noted;
- it is important to retain on file signed original handwritten notes and pass them on to the DSL or a Deputy DSL who may ask you to complete a Family Connect Request for Service Form.

Our policy for record keeping is to chronologically record concerns in a confidential file, including details of dates, times, staff involved and action taken. These should be handwritten but can be typed up to sit alongside handwritten notes. Never discard handwritten notes.

Copies of email threads are also useful additions which can clearly document sequential action. Again, these should be used alongside handwritten notes and by no means be regarded as a substitute action. It is preferable not to name children or parents in an email, but if they are, then it should be password protected.

We ensure that our recording systems are robust and in line with current advice and guidance. Hand written records are not loose-leaf or in ring binder style folders. Any books used are bound and in line with the TWSP guidance. Suitable systems are employed to ensure security of records where books are not used. Where online recording systems are used, we ensure they are totally secure with full access to confidential information strictly limited on a need to know basis.

It should not be presumed that concerns logged by staff electronically have been seen immediately. Ideally, a verbal conversation should also take place as soon as possible, ensuring absolute clarity regarding the concerns expressed.

All child protection records are reviewed annually by the DSL or a Deputy DSL. They are checked to be chronological, tidy, legible and factual in content. This should be undertaken at least annually as appropriate, as records may sometimes be immediately required by professionals. Where reports are needed for child protection and safeguarding meetings these should include attendance figures where the child is of compulsory school age.

All child protection records are clearly marked as such and are kept securely locked on the premises and/or within CPOMS, where used. Procedures are in place when a member of staff leaves the setting or is on long term sick leave for their access to cease. Removal of child protection records from the school by staff will be noted and signed for, as will files

released to professionals. We will follow the TWSP Workbook Guidelines on release and return.

Anonymised statistics in relation to child protection are an important part of performance information. Since 1<sup>st</sup> September 2017 each DSL and Safeguarding Governor has access to a section 175/157 workbook. This information may be collated in the workbooks to inform the headteacher and the governing body of how our school manages child protection issues.

### Retention of children's files

All schools must keep educational records on their children. These should include:

- copies of the reports which have been sent to parents/carers on the children's achievements, as well as other records about those achievements;
- exchanges of correspondence between parents/carers and the school;
- any information the school has on the child's education from the local authority;
- any Education Health Care Plan or statement of special educational needs;
- any personal educational plan.

There are also likely to be other records kept, such as details of attendance, exclusions, behaviour and family background. The educational record does not include notes that a teacher makes for his or her own use only.

The child protection file is a separate file to the educational records. It must be noted that if files are asked to be secured, both files are key elements in any processes for which they are needed. It is important that on releasing files they are signed for on release and on return.

Pupil record files must be kept until the individual reaches the age of 25 years or in certain circumstances later. At this point the file should be disposed of confidentially in line with the [Data Protection: toolkit for schools](#).

### What to do if you are concerned about another's safeguarding practice in the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in our school's safeguarding regime and know that such concerns will be taken seriously by our senior leadership team.

As a CAT school, any concerns should be raised in accordance with our CAT Whistleblowing Policy.

Where staff feel that they cannot report a concern through the above channels, general guidance can be found at [Advice on whistleblowing](#). The [NSPCC whistleblowing helpline](#) is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## 6. The Management of Safeguarding

The school has designated governor with responsibility for safeguarding. They have access to a workbook of their roles and responsibilities, which will ensure the completion of the safeguarding section 175/157 audit, on a yearly basis. These will be supplied by the Telford & Wrekin Council Education Safeguarding Team.

Both the school and our Local Governing Body are committed to working together to create and maintain a safe learning environment for the children and young people attending this setting. We will follow the specific guidance detailed in [Working Together to Safeguard Children 2018](#) and [Keeping Children Safe in Education 2019](#) and will ensure the guidance is implemented so that appropriate safeguarding responses are detailed in policies and procedures, including:

- a staff code of conduct;
- children missing from education;
- child protection and safeguarding;
- suicide intervention;
- bullying, harassment and discrimination;
- use of reasonable force and restraint and behaviour management;
- health and safety, including the use of equipment and provision of first aid;
- use of the internet, electronic devices and social networking sites;
- school trips, placements and outdoor activities;
- extended services provision;
- drugs and substance misuse;
- meeting the needs of pupils with special medical conditions;
- meeting the need of pupils in disseminating prescribed medications;
- intimate care;
- school security;
- whistleblowing;
- issues specific to our local area or population, such as serious violence and child sexual exploitation.

Regular staff and governor meetings will have child protection and safeguarding as an agenda item on them; this is testament to our school making these priority areas.

The school premises are safe and the grounds are not open to unwanted intruders. Where the public can access our school grounds, appropriate risk assessments have been undertaken.

Arrangements are in place to provide access for staff to safeguarding supervision.

### The Designated Safeguarding Lead (DSL)

All schools are required to appoint a member of the senior leadership team to co-ordinate child protection arrangements and to ensure that there are appropriate cover arrangements. Information regarding key personnel can be found in Appendix A.

During term time and in school hours, the DSL and/or a deputy will always be available for staff to discuss any safeguarding concerns with.

During out of hours/out of term activities we will provide appropriate cover by ensuring the DSL or a Deputy is available.

The DSL and any deputies will undergo two-day 'newly appointed designated safeguarding lead' training as recognised by TWSP to provide them with the knowledge and skills required to carry out the role. They will attend one day DSL refresher training as recognised by TWSP every two years. In addition, to their formal training as set out above, their knowledge and skills will be updated, for example, via Telford & Wrekin Council's Education Safeguarding e-bulletin, attending termly DSL refreshers and taking time to read and digest safeguarding developments, at regular intervals, and at least annually, to keep up with any developments relevant to their role. We aim to ensure at least one DSL or Deputy DSL attends each termly update. Training will then be disseminated to all relevant staff and governors as appropriate.

The DSL forms part of a borough wide network, where information is shared, in a two-way process, with the Telford & Wrekin Council Education Safeguarding Team. The DSL is also responsible for completing the section 175/157 audit each year and submitting it to TWSP. The section 175/157 audit is supplied by the Telford & Wrekin Council Education Safeguarding Team.

In this school the DSL:

- is a senior member of staff from the school's leadership team and therefore has the status and authority within the school to carry out the duties of the post, including committing resources and supporting and directing other staff;
- takes lead responsibility for safeguarding and child protection, including online safety, in the school, which will not be delegated although the activities of the DSL may be delegated to appropriately trained deputies. The role and responsibility is explicit in the role holder's job description;
- is appropriately trained, receives refresher training at two-yearly intervals and regularly (at least annually) updates their knowledge and skills to keep up with any developments relevant to their role;
- acts as a source of advice, support and expertise to the school community;
- encourages a culture of listening to children and taking account of their wishes and feelings;
- is alert to the specific needs of children in need, those with special educational needs, children who are looked after or were previously looked after and young carers;
- oversees the provision of effective pastoral support;
- has a working knowledge of locally agreed multi agency safeguarding arrangements and procedures put in place by TWSP;
- has an understanding of the Early Help process to ensure effective assessment and understanding of children's additional needs in order to inform appropriate provision of early help and intervention;
- keeps detailed records of all concerns, ensuring that such records are stored securely and flagged, but kept separate from, the pupil's general file;
- refers cases of suspected abuse to Children's Social Care or the Police as appropriate;
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required;
- ensures that staff do everything they can to support social workers when Children's

Social Care become involved;

- refers cases to the Channel programme where there is a radicalisation concern as required and support staff who make referrals to the Channel programme;
- notifies Children’s Social Care if a child with a child protection plan is absent for more than two days without explanation;
- ensures that, when a pupil under the age of 18 years leaves the school, all child protection records are passed to the new school (separately from the main pupil file and ensuring secure transit) and confirmation of receipt is obtained. If the child is the subject of an open case to Children’s Social Care, the pupil’s social worker is also informed;
- attends and/or contributes to child protection conferences, strategy meetings and multi-agency sexual exploitation (MASE) meetings;
- co-ordinates the school’s contribution to child protection plans as part of core groups, attending and actively participating in core group meetings;
- develops effective links with relevant statutory and voluntary agencies including the local safeguarding partnership;
- ensures that all staff sign to indicate that they have read and understood the child protection and safeguarding policy and the Staff Code of Conduct (Staff Behaviour Policy); the behaviour policy; the school’s safeguarding response to children who go missing from education; and the role of the DSL (including the identity of the DSL and any deputies);
- ensures that all staff understand that if they have any concerns about a child’s welfare, they should act upon them immediately, either by speaking to the DSL (or a Deputy DSL) or, in exceptional circumstances, taking responsibility to make a referral to Children’s Social Care;
- ensures that all staff know how to make a referral to Children’s Social Care if necessary;
- has a working knowledge of relevant national guidance in respect of all specific safeguarding issues highlighted in paragraphs 21-34 (pages 8-11) and Annex A of *Keeping Children Safe in Education, 2019 (p78-91)*, ensuring that all staff receive necessary training, information and guidance;
- ensures that the child protection and safeguarding policy and procedures are regularly reviewed and updated at least annually, working with the whole school community of pupils, parents, staff, volunteers and governors and/or proprietors regarding this;
- liaises with the nominated governor and headteacher (where the DSL role is not carried out by the headteacher) as appropriate;
- keeps a record of staff attendance at child protection training;
- makes the child protection and safeguarding policy available publicly, i.e. on the school’s website or by other means;
- ensures parents are aware of the school’s role in safeguarding and that referrals about suspected abuse and neglect may be made;
- ensures that the school holds more than one emergency contact number for every pupil;
- ensures that the headteacher is aware of the responsibility under *Working Together 2018* to refer all allegations that a child has been harmed by or that children may be at risk of harm from a member of staff or volunteer to the Designated Officer (DO) in the Local Authority within one working day prior to any internal investigation; and to the Disclosure and Barring Service (DBS) as appropriate.

## Deputy Designated Safeguarding Leads

Deputy DSLs are trained to the same level as the DSL and support the DSL with safeguarding matters as appropriate. Although some of the activities of the DSL may be delegated to these appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the DSL; this lead responsibility will not be delegated.

In the absence of the DSL, Deputy DSLs carry out those functions necessary to ensure the ongoing safety and protection of pupils. The role and responsibility is explicit in the role holders' job descriptions. In the event of the long-term absence of the DSL, the deputy will assume all of the functions of the DSL as above.

## Staff

All staff members, including supply teachers, visiting professionals working with children in the school (e.g. counsellors), those who support sex education (e.g. school nurse), external providers of school activities and those supporting school visits, are informed of the name of the DSL and deputies and the schools procedures for protecting children, for example, how to report their concerns or suspicions and how to receive, record and report disclosures.

Staff should not accept personal invitations to visit the homes of children unless permission or instruction has been sought from the headteacher or DSL and it is viewed as a professional appointment. For example, supporting education welfare issues etc. This should be viewed on a case by case basis. To support this, guidance from the DfE (September 2010) states 'Meetings with pupils away from the school premises should only be arranged with the specified approval of the headteacher and the prior permission of the pupil in question'. We accept this guidance from the DfE, stating that in the case of private meetings; 'Staff and volunteers should be aware that private meetings with individual pupils could give cause for concern. There will be occasions when a confidential interview or a one-to-one meeting is necessary. Such interviews should be conducted in a room with visual access or an area which is likely to be frequented by other people. Another pupil or adult should be present or nearby. Where conditions cannot apply, staff should ensure that another adult knows that the interview is taking place'.

## Multi-agency working

The school and the DSL are familiar with the TWSP arrangements. They will engage with the TWSP as required. They will follow the Telford & Wrekin Threshold Guidance or the appropriate threshold guidance for where the child resides to follow the local protocol for assessments. The governing board expect the staff to work with social care, the police, health service and other services to promote the welfare of children and protect them from harm. This includes us providing a coordinated offer of early help when additional needs are identified by us or another agency. We will always contribute to inter-agency plans to provide additional support to children subject to child protection plans. We will never restrict access for children's social care to conduct a section 17 or section 47 assessment.

## Information sharing

We recognise that information is vital in identifying and tackling all forms of abuse and neglect. The Governing Board expect all staff to share information with practitioners and

local agencies. In respect of files being released when requested by the Police under [Section 29 of the Data Protection Act 2018 a form entitled 'Request to external organisation for the disclosure of personal data to the police-Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6\(1\)d\)](#)' should accompany that release and a copy will be retained for our records. We will also consider the [7 Golden Rules for Information Sharing](#) and will adopt the [Information sharing advice for safeguarding practitioners](#). Where necessary, the school will also seek from our **Data Protection Officer**. Upon releasing records the school will request ID Badges prior to handover. If the Police are only after minimal data e.g. address or phone number, we will ensure we check the police ID and we will record what information was asked for and the name of the police officer requesting it. A form may not be required on these occasions.

We are committed to sharing information as early as possible to help identify, assess and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to children's social care.

When a child changes school within or outside the authority, all child protection records will be passed or securely sent on to the DSL of the next educational setting by the current DSL or headteacher. The DSL, if thought appropriate, may wish to share relevant safeguarding information in advance of the new children arriving if they need continuing support e.g. in response to sexual abuse. If the child is leaving to attend another school within term time, best practice would be for a signed record/or hard copy acknowledgement that the transfer of files has taken place. The current school in this process should **not** photocopy and retain child protection records as this is deemed by the Information Commissioners Office to be in contravention of The Data Protection Act 2018 (DPA 18). Instead, the school should produce a chronology to pass on with the child protection records and retain a copy of this chronology for themselves for audit purposes; this would be deemed best practice. We will follow the Workbook Guidance in all circumstances.

## Training

The governing board will ensure that all staff undergo safeguarding and child protection training, including online safety training, at induction. We will update staff training regularly. We will train staff on the TWSP policies and procedures, our child protection and safeguarding policy, the schools behaviour policy and code of conduct. We will ensure that staff access face-to-face raising awareness of child protection training. All staff will receive training in managing sexual violence and sexual harassment.

All staff will receive regular safeguarding and child protection updates as required, and at least annually, to provide them with the relevant skills and knowledge to safeguard children.

## Parents

Parents play an important role in protecting their children from abuse. All schools are required to consider the safety of the child and should a concern arise, professional advice will be sought prior to contacting parents. If deemed appropriate, parents will be contacted, and the school will continue to work with them to support the needs of their child. Consent from the parents will be sought, although in exceptional circumstances and with the best interests of the child being considered, this may be overridden.

We aim to help parents understand their responsibility for the welfare of all children, which includes their duty to refer cases to social care services and/or police in the interests of the child. The governing board will include a child protection statement in our school prospectus and all parents can view a copy of this policy.

Parents who have concerns regarding a member of staff can in the first instance raise those with the headteacher, the DSL or the governing board of the school. This may involve the school then sharing those concerns with relevant agencies. Where the parent has concerns regarding the headteacher, the chair of governors should be consulted in the first instance.

Parents can liaise with Ofsted on such conduct issues or regulatory concerns. Advice can be found on its website [www.ofsted.gov.uk](http://www.ofsted.gov.uk) or contact can be made directly to Ofsted on Helpline (08456 40445) or a Whistle-blowing line (08456 404046).

Parents can liaise with the Independent Schools Inspectorate (ISI) on such conduct issues or regulatory concerns. Advice can be found on its website <https://www.isi.net/parents-and-pupils/concerns-about-a-school> or contact can be made directly to ISI via email at [concerns@isi.net](mailto:concerns@isi.net) or by calling 020 7600 0100.

On occasions Ofsted may forward complaints that potentially raise a safeguarding concern about our school to Family Connect. In such instances we will work with all agencies within Family Connect to clearly respond to Ofsted on a case by case basis.

Parents/carers can also access Ofsted [Parent View](#) which is an online survey questionnaire where parents can give their views. Where possible, this will be monitored regularly by the school to quickly address any concerns.

All complaints should be made via our school complaints procedures.

We will keep parents informed of all areas of safeguarding and child protection through the regular methods of communication.

We wish to make it clear to parents the standards, behaviour and respect we expect from them and conversely from us. If a parent's behaviour is a cause for concern, then we will ask them to leave the school premises. We wish to make it clear that in serious cases, the head teacher may notify parents in writing that their implied licence to be on the school premises is temporarily revoked, subject to any representations that the parent may wish to make. This school will give parents the opportunity to formally express their views on the decision to bar in writing and this will be reviewed via the complaints policy.

Schools are private places. We will therefore act to ensure they remain a safe place for all. The public, including parents, have no automatic right of entry.

Our school expects parents to talk to us about any concerns they have regarding the care and education provided by us in the first instance. We urge all parents not to express these concerns on social media platforms, at least not before sharing these concerns with us first.

## Online safety

The use of technology has become a significant component of many safeguarding issues. In cases of child sexual exploitation, radicalisation and sexual predation, for example, technology often provides the platform that facilitates harm. An effective approach to online safety empowers us to protect and educate the whole school community in our use of technology and we will work with our information technology partners to identify, intervene in and escalate any incident, where appropriate.

The breadth of issues classified within online safety is considerable:

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

Our school teaches safeguarding, including online safety. We will use the [Teaching online safety in school](#) guidance to ensure our pupils understand how to stay safe and behave online as part of our curriculum.

We regularly review our online safety policy and make all aware of its existence and importance. We ensure all staff receive training on what is acceptable in terms of the use of online technology. Where appropriate, intervention will take place when anyone uses e-technology in an unacceptable fashion.

Online monitoring software is used in our school and this provision is reviewed, updated and checked regularly. This software identifies online risk of harm, including risks posed by the online activity of extremist and terrorist groups. On occasions, unacceptable websites may be accessed inadvertently; if this occurs then the site should be closed down immediately and reported without delay to the headteacher and the DSL.

We recognise at this school that all information technology, whether personal or work based, is a whole school issue and all staff have a duty to be vigilant. We recognise online safety is a major concern for all professionals. For more information and support, staff will refer to the ‘information and support’ section of Annex C: Online safety KCSiE, 2019.

Our school also takes seriously our duty to assist parents and help them with online safeguarding. As such, we will make them aware of the webpage Parent Info which is a comprehensive, free resource for schools and parents covering a range of safeguarding topics and information about apps and when they are updated etc. The content can be found at <http://parentinfo.org/>

### Safe use of electronic devices (Early Years settings only)

Within the early years provision at our school we ensure the safety and welfare of the children in our care. Personal electronic devices are not permitted within this setting, when in the presence of children.

Therefore we will ensure that we take measures including ensuring that:

- personal electronic devices are kept in a secure place and not accessible throughout contact time with the children;
- photographs or images of any children within our care are only taken following parental consent and only by using a school device and that those images remain within the setting
- when on outings, electronic devices are only used to make or receive phone calls relating directly to ensuring the safety and well-being of the children.

### Safe use of electronic devices (All settings)

We follow the good practice guidance from the Information Commissioners Office, on [taking photographs in educational institutions](#). In the interests of safeguarding a common sense approach on a case by case basis will be taken in this area.

Under no circumstances will staff photograph injuries seen on children as our staff are not expert witnesses. If the concern is around non-accidental injury then that is a matter that requires immediate attention on the day, resulting in an appropriate referral to Family Connect. Those professionals will control the process of photographic evidence gathering underway and assessment.

### Teaching safeguarding

*Keeping Children Safe in Education 2019* requires Governing Bodies and proprietors to ensure that children are taught about safeguarding, including online safety, as part of providing a 'broad and balanced curriculum'.

Children are taught to understand and manage risk through our personal, social, health and economic (PSHE) education and sex and relationships lessons and through all aspects of school life. Our approach is designed to help children to think about risks they may encounter and with the support of staff, work out how those risks might be reduced or managed. Discussions about risk are empowering and enabling for all children and promote sensible behaviour rather than fear or anxiety. Children are taught how to conduct themselves and how to behave in a responsible manner. Children are also reminded regularly about online safety, the risks of sharing content and images online and tackling bullying, including cyber bullying procedures. The school continually promotes an ethos of respect for children and pupils are encouraged to speak to a member of staff of their choosing about any worries they may have.

Discussions about risk will include talking to children about the risks and issues associated with young people sending, receiving and/or disseminating indecent images of themselves and other young people, which is widely referred to as 'sexting'.

It is recognised that a young person may choose to share indecent images with another young person in the context of a romantic relationship and that she or he may do so without any intention to cause harm or distress to anybody. Although technically an offence, 'sexting' of that nature is referred to as 'experimental sexting' and it is usually not necessary or appropriate to criminalise young people in those circumstances.

However, there are clear risks associated with such behaviour. Staff are trained to be vigilant and to notice and record any concerns about young people sending and receiving

indecent images, which includes listening to what young people say to each other and to staff, as they do with any other safeguarding concern.

When concerns are identified, staff will always speak to children and will inform parents about their concerns unless there is good reason to believe that doing so would place the child at increased risk of significant harm. The DSL will also need to consider the Fraser guidelines in making a judgement about whether or not to respect a young person's request not to inform his/her parents/carers.

N.B. Children under the age of 13 are unable to consent to sexual activity. Any imagery containing sexual activity involving under 13 year olds will therefore be referred to the Police.

Through our PSHE programme and via Assemblies and other aspects of our curriculum, students are also taught about:

- online safety
- consent and healthy relationships,
- fundamental British values,
- how children can keep themselves safe from all forms of bullying including online bullying,
- child sexual exploitation including issues of informed consent,
- sexting,
- drugs and alcohol.

### Children's wishes

The governing board will ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. The headteacher and DSL will put systems in place for children to express their views and give feedback. We will always operate with the best interests of the child at heart.

### Children who are looked after or who were previously looked after

The most common reason for children becoming looked after is as a result of abuse or neglect. Children who were previously looked after potentially remain vulnerable. The school ensures that staff have the necessary skills and understanding to keep children who are looked after and children who were previously looked after safe and ensures that appropriate staff have information about a child's looked after status and care arrangements, including the level of authority delegated to the carer by the authority looking after the child. The designated teacher for children who are looked after and previously looked after and the DSL hold details of the child's social worker and the name and contact details of the Local Authority's virtual head for children who are looked after.

When dealing with children who are looked after and previously looked after we will work with all agencies to take prompt action where necessary to safeguard these children.

### The designated teacher for children who are looked after

The governing board has appointed a designated teacher to work with the local authorities to promote the educational achievement of registered pupils who are looked after. With

the commencement of sections 4 to 6 of the Children and Social Work Act 2017, designated teachers have responsibility for promoting the educational achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales. The designated teacher has appropriate training and relevant qualifications and experiences to fulfil this role.

We follow the statutory guidance on [The Roles and Responsibilities of the Designated Teacher](#).

### Virtual school heads

Virtual school heads manage pupil premium plus for looked after children. They receive this funding based on the latest published number of children looked after by the local authority. The designated teacher works with the virtual school head to discuss how funding can be best used to support the progress of children who are looked after in the school and meet the needs identified in the child's personal education plan (PEP). The designated teacher should also work with the virtual school head to promote the educational achievement of children who were previously looked after.

We follow the statutory guidance on [Promoting the Education of Looked After Children](#).

### Care leavers

The designated safeguarding lead understands the ongoing responsibilities of local authorities to the young people who cease to be looked after and become care leavers. The designated safeguarding lead will hold detail of the local authority Personal Advisor appointed to guide and support the care leaver, and will liaise with them as necessary regarding any issues of concern affecting the care leaver.

### Children who have special educational needs and/or disabilities (SEND)

We recognise that children who have SEND can face additional safeguarding challenges. We appreciate the additional barriers that can exist when recognising abuse and neglect of children in the group. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers.

To help address these additional challenges we will provide extra pastoral support for children with SEND.

### The use of 'reasonable force'

*Keeping Children Safe in Education (DfE 2019)* highlights that there are circumstances when it is appropriate for staff in schools and colleges to use reasonable force to safeguard children and young people. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to

be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

We will always follow the DfE advice for schools on the use of [Reasonable Force in Schools](#).

We believe that the adoption of a ‘no contact’ policy at our school could leave staff unable to fully support and protect our pupils and students. We will adopt a sensible approach allowing staff to make appropriate physical contact. The decision on whether to or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to risks presented by incidents involving children with SEND or with medical conditions, we will consider the risks carefully because we recognise the additional vulnerability of these groups. We will consider our duties under the Equality Act 2010 in relation to making reasonable adjustments, non-discrimination and our Public Sector Equality Duty.

We will plan positive and proactive behaviour support, for instance through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, we aim to reduce the occurrence of challenging behaviour and the need to use reasonable force. We will only use reasonable force where de-escalation processes have failed.

### Poor or irregular attendance

Persistence absence is recognised when school attendance is below 90%, although concerns may still be raised if above this. We will comply with the statutory guidance [Children Missing Education](#). As such, the attendance lead will refer to and use the established protocol document of notification to the Local Authority, filling out the appropriate paperwork, policies and procedures for identifying pupils who are missing education and following policies and procedures for pupils on a modified timetable. This information is available from Telford & Wrekin Council Access & Inclusion Team.

In addition to the above and where reasonably possible we will endeavour to hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give us additional options to make contact with a responsible adult when a child is missing education and poses a potential safeguarding concern.

Where a child is on a Child Protection Plan has been missing from school for two consecutive days we will notify the child’s allocated social worker.

### Children leaving school without permission

Where children leave the classroom or leave school grounds without permission we follow the legal framework of the Children Act 1989 s3 (5) which states that, ‘Anyone who has care of a child without parental responsibility may do what is “reasonable” in all the circumstances to safeguard and promote the child’s welfare. It is likely to be “reasonable” to inform the police, or children’s services departments, and, if appropriate, their parents, of the child/young person’s safety and whereabouts’.

However, in principle, if a pupil runs out of class we will establish where he or she has gone. For avoidance of doubt and for all within and outside of the school, staff will not run after them but will seek additional support. It is advisable to keep a watchful eye on any child who has taken themselves out of the school building and possibly out of the school grounds, unless this watchful eye provokes the child to run further. It is and will be a judgement call for staff to take what they feel is **reasonable** action in line with the advice above. If a child is no longer on the school premises, we will contact parents in the first instance. If they are not contactable we will usually inform the police that a pupil has left school and is at risk.

### Drug and substance misuse

Where issues come to our attention in relation to drugs and substance misuse we will follow the non-statutory advice contained within [DfE and ACPO drug advice for schools](#). This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within our school. The document clearly sets out our powers and what we can do. This preventative and supportive approach will sit hand in hand with our statutory functions of child protection and the alerting to established referral procedures and the law.

### Suicide Intervention

We accept and understand that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. We work with our pupils and in partnership with external agencies to support anyone in our school community that may have thoughts of suicide. We will follow TWSP's [Suicide Intervention Policy](#) to assist wherever we can in making those in our care as safe as is possible. We will also make staff aware of the following useful link in raising awareness of the subject: <http://zerosuicidealliance.com/>

We recognise that suicide bereavement has been described as 'grief with the volume turned up'. The effects on families, communities and society as a whole are devastating and tragic. We will support in any way we can and the link below will be signposted as appropriate [http://www.petesdragons.org.uk/Bereavement\\_Support\\_2369.aspx](http://www.petesdragons.org.uk/Bereavement_Support_2369.aspx).

### Changing in school

We consider arrangements for safe changing of children for physical education (PE). We will be guided by the NSPCC guidance Best Practice for PE Changing Rooms. This consideration will come under our duty and remit of health & safety and in the context of children's welfare. We follow the guidance and do what we need to do in relation to organising changing facilities for children; staff supervision; changing areas for children with additional needs; changing considerations for drama productions and using off-site changing rooms. [NSPCC factsheet](#)

## 7. A Safer School Culture

### Safer Recruitment

Our school endeavours to ensure that we do our utmost to employ ‘suitable’ staff and allow ‘suitable’ volunteers to work with children by complying with the requirements in *Keeping Children Safe in Education 2019* together with the school’s Safer Recruitment policies.

Safer recruitment means that all applicants will:

- complete an application form which includes their employment history and explains any gaps in that history;
- provide two referees, including at least one who can comment on the applicant’s suitability to work with children;
- provide evidence of identity and qualifications;
- if offered employment, be checked in accordance with the Disclosure and Barring Service (DBS) regulations as appropriate to their role. This will include:
  - an enhanced DBS check and a barred list check for those, including unsupervised volunteers, engaged in Regulated Activity;
  - an enhanced DBS check without a barred list check for all volunteers not involved in Regulated Activity but who have the opportunity of regular contact with children;
  - an enhanced DBS check for all governors (not including associate members), which will only include a barred list check for governors involved in Regulated Activity
- if offered employment, provide evidence of their right to work in the UK;
- be interviewed by a panel of at least two school leaders/governors, if shortlisted.

Schools are ‘specified places’ which means that the majority of staff and volunteers will be engaged in Regulated Activity. A fuller explanation of regulated activity can be found in Part 3 of *Keeping Children Safe in Education, 2019*.

The school will also:

- ensure that every job description and person specification for roles in school includes a description of the role holder’s responsibility for safeguarding;
- ask at least one question at interview for every role in school about the candidate’s attitude to safeguarding and motivation for working with children;
- verify the preferred candidate’s mental and physical fitness to carry out their work responsibilities;
- obtain references for all shortlisted candidates, including internal candidates;
- carry out additional or alternative checks for applicants who have lived or worked outside the UK;
- ensure that applicants for teaching posts are not subject to a prohibition order issued by the Secretary of State;
- check that an applicant for a management position is not the subject of a section 128 direction made by the secretary of state prohibiting or restricting her/him from taking part in the management of an independent school, academy or free school.

At least one member of each recruitment panel will have attended safer recruitment training and ideally the TWSP recommended Safer Recruitment Consortium training delivered by Telford & Wrekin Council.

All new members of staff and volunteers will undergo an induction that includes familiarisation with the school's Child Protection and Safeguarding Policy, Staff Code of Conduct and the Behaviour Policy as well as identification of their child protection training needs.

All staff are required to sign to confirm they have received, read and understood a copy of the Child Protection and Safeguarding Policy and the Staff Code of Conduct.

The school obtains written confirmation from supply agencies and third party organisations that they have satisfactorily undertaken all appropriate safeguarding checks in respect of individuals they provide to work in the school that the school would have undertaken if they were employing the individual directly.

Trainee teachers will be checked either by the school or by the training provider, from whom written confirmation will be obtained, confirming their suitability to work with children.

The school maintains a Single Central Record of recruitment checks undertaken and ensures that the record is maintained in accordance with section 3 of *Keeping Children Safe in Education 2019*.

The school is supported by CAT's Human Resources team, who are available to advise on the management of safer recruitment procedures.

## Visitors

We understand that we do not have the power to request DBS checks and barred list checks, or to ask to see DBS certificates for visitors. We will always request to see appropriate identification for visitors. The head teacher will use their professional judgement to determine the need to escort or supervise visitors. A record of visitors will be maintained and all visitors will be easily identified by a visitor's lanyard or badge.

## Alternative provision

For any children placed in external alternative provision provider, we continue to be responsible for the safeguarding of that pupil, and we will ensure that the provider meets the needs of the pupil. We will obtain written confirmation from the alternative provider that appropriate safeguarding checks have been carried out on individuals working at the establishment, i.e. those checks that the school would otherwise perform in respect of its own staff.

## Children staying with host families (homestay)

If the school arranges a homestay, we will consider the suitability of the adults in the respective families who will be responsible for the visiting child during the stay.

We will always consider what intelligence/information will best inform our assessment of the suitability of the adults in those families who will be responsible for the visiting child during the stay. We will use our professional judgement to decide what will be relevant. To help inform our assessment, we will obtain a DBS enhanced certificate with barred list information. This check will not only establish whether the adults are barred from engaging in regulated activity relating to children, but where criminal record information is disclosed it will also allow us to consider, alongside all other intelligence that we have obtained, whether the adults would be a suitable host for a child. We will also decide whether it is necessary to obtain a DBS enhanced certificate in respect of anyone aged 16 or over in the household where the child will be staying.

### Homestay - suitability of adults in host families abroad

We recognise that it is not possible for us to obtain criminality information from the DBS about adults who provide homestays abroad. We will liaise with partner schools abroad, to establish a shared understanding of, and agreement to, the arrangements in place for the visit. We will use our professional judgement to satisfy ourselves that the arrangements are appropriate and sufficient to safeguard effectively every child who will take part in the exchange. We will always inform parents of the agreed arrangement.

We will decide on a case by case basis whether it is necessary to contact the relevant foreign embassy or High Commission of the country in question to discuss what checks may be possible in respect of those providing homestay outside of the UK.

### Private fostering arrangements

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

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

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

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children's Social Care, the school will encourage parents and private foster carers to notify them and will share information with Children's Social Care as appropriate.

## 8. Allegations of abuse made against teachers or other staff

The process of managing allegations against those who work with children can be viewed on <http://westmidlands.procedures.org.uk/> Section 1.14 'Allegations against Staff or Volunteers'.

Our school has internal procedures and processes in place for dealing with allegations and will follow TWSP policy & procedure.

We will adhere to Part four: Allegations of abuse made against teachers and other staff KCSiE, 2019.

We believe that those who work within our community are in positions of trust and as such our Codes of Conduct is based on the underlying principle that the highest standards are expected from all, in line with KCSiE, 2019.

[Guidance for safer working practice for those working with children and young people in educational settings](#) produced by the Safer Recruitment Consortium, provides excellent guidance on the expected standards of all who work with children. We will make our school community aware of its existence and this will work alongside the Code of Conduct mentioned above and other established human resources processes.

The school will liaise with CAT's human resources team to provide support to staff going through a disciplinary and/or allegations process. This will support referrers, investigators and any other staff member affected through any such process.

We will manage all cases of allegations that might indicate a person would pose a risk of harm if they continue to work in regular or close contact with children in their present position, or in any capacity. We will act rapidly if a teacher or member of staff (including volunteers) in our school has:

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

If we receive allegations against a teacher who is no longer teaching in our school or at all we will refer this to the police. Historical allegations of abuse will also be referred to the police.

We have a duty of care to our employees. We will ensure anyone facing an allegation receives effective support and we will provide the employee with a named contact if they are suspended. We are committed to dealing with any allegation of abuse made against a teacher or other member of staff or volunteer rapidly, in a fair and consistent way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation.

Staff will be advised to seek support from their Professional Association or Trade Union if it is needed.

The Designated Officer for the Local Authority, Glenn Ashbrooke, will be informed of all allegations that come to our attention and appear to meet the risk criteria set out above so that police and children's social care may be consulted, as appropriate.

The headteacher or, where the head teacher is the subject of an allegation, the Chair of Governors will serve as the 'case manager' and will discuss the allegation immediately with the Designated Officer by contacting Family Connect. The case manager will provide or obtain relevant information as requested by the designated officer. In some situations the case manager may consider it appropriate to involve the police immediately, for example if the person is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. Where there is no such evidence, the case manager will discuss the allegations with the designated officer in order to help determine whether police involvement is necessary.

The initial sharing of information and evaluation may lead to a decision that no further action is to be taken in regard to the individual facing the allegation or concern, in which case this decision and a justification for it, will be recorded by the case manager. The case manager will reach an agreement with the designated officer, on what information should be put in writing to the individual concerned and by whom. The case manager will then consider with the designated officer what action should follow both in respect of the individual and those who made the initial allegation.

The case manager will inform the accused person about the allegation as soon as possible after consulting the designated officer. The case manager will provide them with as much information as possible at that time. However, where a strategy discussion is needed, or police or children's social care services need to be involved, the case manager will not do this until those agencies have been consulted, and have agreed what information can be disclosed to the accused. We will consider carefully whether the circumstances of a case warrant a person being suspended from contact with children at the school or whether alternative arrangements can be put in place until the allegation or concern is resolved. We will explore all options to avoid suspension prior to taking that step.

The school will consider options where an investigation by the police or children's social care services is unnecessary, or the strategy discussion or initial evaluation decides that is the case. We will discuss with the designated officer the next steps. In those circumstances, the options open to us depend on the nature and circumstances of the allegation and the evidence and information available. This will range from taking no further action to dismissal or a decision not to use the person's services in future. Suspension should not be the default position; an individual should be suspended only if there is no reasonable alternative.

Where further enquiries are needed to inform a decision about how to proceed, the case manager will discuss with the Designated Officer how and by whom the investigation will be undertaken. In straightforward cases, the investigation will normally be undertaken by a senior member of the school's staff.

The case manager will appoint a named representative to keep the person who is the subject of the allegation informed of the progress of the case and consider what other support is appropriate for the individual. We will offer appropriate support from other services.

We will tell parents or carers of the child or children involved about the allegation as soon as possible if they do not already know of it. However, where a strategy discussion is required, or police or children's social care services need to be involved, the case manager will not do so until those agencies have been consulted and have agreed what information can be disclosed to the parents or carers. Parents or carers will be kept informed about the progress of the case, and told the outcome where there is not a criminal prosecution, including the outcome of any disciplinary process. The deliberations of a disciplinary hearing, and the information taken into account in reaching a decision, will not normally be disclosed but the parents or carers of the child will be told the outcome in confidence.

Parents and carers will be made aware of the requirement to maintain confidentiality about any allegations made against teachers whilst investigations are ongoing. If parents or carers wish to apply to the court to have reporting restrictions removed, we will advise them to seek legal advice.

In cases where a child may have suffered significant harm, or there may be a criminal prosecution, we will work with children's social care services, or the police as appropriate, to consider what support the child or children involved may need.

The case manager will take advice from the Designated Officer, police and children's social care to agree the following:

- who needs to know and, importantly, exactly what information can be shared;
- how to manage speculation, leaks and gossip;
- what, if any, information can be reasonably given to the wider community to reduce speculation;
- how to manage press interest if, and when, it should arise.

A referral to the DBS must be made, if any of the risk criteria listed above are met. We will also consider whether a referral to the Secretary of State is appropriate.

To avoid potential allegations and for the safety and welfare of pupils and the protection of staff, we will make classrooms highly visible places whereby easy viewing is possible. The masking of windows is forbidden and as such treated as a safeguarding issue for the protection of all. There may be exceptional circumstances where masking of classrooms is needed and justified, for example, for the teaching of drama, in these cases the head teacher will make a judgement on a case by case basis being appropriate, balanced and proportionate.

## Appendix 1 - Key Safeguarding Personnel in Schools

### Key personnel at Grange Park Primary School

**The designated safeguarding lead (DSL) is** Lisa Millington

Contact details: email: [lisa.millington@taw.org.uk](mailto:lisa.millington@taw.org.uk) tel: 01952 387470

**The deputy designated safeguarding lead (DDSL) is** Zoe Meredith

Contact details: email: [zoe.meredith@taw.org.uk](mailto:zoe.meredith@taw.org.uk) tel: 01952 387947

**Other staff trained to undertake the functions of the designated safeguarding lead are:**

- Richard Thorpe (Headteacher)
- Rebecca Marshall

**Contact details:**

email: [richard.thorpe@taw.org.uk](mailto:richard.thorpe@taw.org.uk),

[zoe.meredith@taw.org.uk](mailto:zoe.meredith@taw.org.uk),

[rebecca.marshall@taw.org.uk](mailto:rebecca.marshall@taw.org.uk)

tel: 01952 387490

**The nominated Safeguarding Governor is** Gillian Bailey

Contact details: email: Gillian Bailey and Louise Weaver tel: 01952 387490

**The headteacher is** Richard Thorpe

Contact details: email: [richard.thorpe@taw.org.uk](mailto:richard.thorpe@taw.org.uk) tel: 01952 387490

### **Key personnel at Telford Langley School**

**The designated safeguarding lead (DSL) is Kevin Preece**

Contact details: email: kevin.preece@taw.org.uk      tel: 01952 386700

**The deputy designated safeguarding lead (DDSL) is Shanine Thomas**

Contact details: email: Shanine.thomas2@taw.org.uk      tel: 01952 386700

**Other staff trained to undertake the functions of the designated safeguarding lead are**

- Ceri Kinsey ceri.kinsey@taw.org.uk
- Alison Prosser Alison.prosser@taw.org.uk
- Jackie Walters Jackie.walters@taw.org.uk
- Ian Farmer ian.farmer@taw.org.uk

**The nominated Safeguarding Governor is Charlotte Creen**

Contact details: email: charlotte.creen@taw.org.uk      tel: 01952 387400

**The headteacher is Steve Carter**

Contact details: email: steven.carter@taw.org.uk      tel: 018952 386700

### Key personnel at Telford Park School

**The designated safeguarding lead (DSL) is Holly Rigby**

Contact details: email [holly.rigby@taw.org.uk](mailto:holly.rigby@taw.org.uk) tel: 01952 387400

**The deputy designated safeguarding lead (DDSL) is Kevin Preece**

Contact details: email: [kevin.preece@taw.org.uk](mailto:kevin.preece@taw.org.uk) tel: 01952 386700

**Other staff trained to undertake the functions of the designated safeguarding lead are**

- Gail Pearson - [gail.pearson1@taw.org.uk](mailto:gail.pearson1@taw.org.uk)
- Marc Clark - [marc.clark@taw.org.uk](mailto:marc.clark@taw.org.uk)
- Louis Hylton - [louis.hylton@taw.org.uk](mailto:louis.hylton@taw.org.uk)
- Louise Baker - [louise.baker@taw.org.uk](mailto:louise.baker@taw.org.uk)

**The nominated Safeguarding Governor is Charlotte Creen**

Contact details: email: [charlotte.creen@taw.org.uk](mailto:charlotte.creen@taw.org.uk) tel: 01952 387400

**The headteacher is Holly Rigby**

Contact details: email: [holly.rigby@taw.org.uk](mailto:holly.rigby@taw.org.uk) tel: 01952 387400

### Key personnel at The Telford Priory School

The designated safeguarding lead (DSL) is Sarah Murdoch

Contact details: email: [sarah.murdoch@taw.org.uk](mailto:sarah.murdoch@taw.org.uk)

tel: 01952 386 400

The deputy designated safeguarding lead (DDSL) is Rosei Nield

Contact details: email: [Rosei.Nield@taw.org.uk](mailto:Rosei.Nield@taw.org.uk)

tel: 01952 386 400

Other staff trained to undertake the functions of the designated safeguarding lead are

- Nicki Smith
- Rachel Pitt

Contact details: email: [Nicola.Smith3@taw.org.uk](mailto:Nicola.Smith3@taw.org.uk)

[Rachel.Pitt@taw.org.uk](mailto:Rachel.Pitt@taw.org.uk)

tel: 01952 386 400

The nominated Safeguarding Governor is TBC

Contact details: email: [TPS.governors@taw.org.uk](mailto:TPS.governors@taw.org.uk)

tel: 01952 386 400

The headteacher is Stacey Jordan

Contact details: email: [Stacey.Jordan@taw.org.uk](mailto:Stacey.Jordan@taw.org.uk)

tel: 01952 386 400

### Key personnel at Windmill Primary School

**The designated safeguarding lead (DSL) is Jason Millington**

Contact details: email: [Jason.millington@taw.org.uk](mailto:Jason.millington@taw.org.uk) tel: 01952 386360

**The deputy designated safeguarding leads (DDSLs) are Kizzie Cole and Melanie Dexter**

Contact details: email: [Kizzie.coles@taw.org.uk](mailto:Kizzie.coles@taw.org.uk) tel: 01952 386360

[Melanie.dexter@taw.org.uk](mailto:Melanie.dexter@taw.org.uk) tel: 01952 386360

**The nominated Safeguarding Governor is Graham Parkinson**

Contact details: email: [graham.parkinson2@taw.org.uk](mailto:graham.parkinson2@taw.org.uk) tel: 01952 386360

**The headteacher is Mark Gibbons**

Contact details: email: [Mark.gibbons@taw.org.uk](mailto:Mark.gibbons@taw.org.uk) tel: 01952 386360