



# SAFEGUARDING POLICY

## **Compliance statement**

Every policy is reviewed at regular intervals and where applicable, as stipulated by law. Each policy is also available in additional formats including Braille and in additional languages upon request, within reasonable timescales as stipulated by the school.

Reviewer/s:	Danielle Ashley & Kim Mapp- Nwosu
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Approved by:	Full Governing Board

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## Key contacts

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**Designated safeguarding lead(s):**

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**Deputy designated safeguarding lead(s):**

Name: Danielle Ashley and Fiona Longford-Jackson

**Designated CLA teacher:**

Name: Kim Mapp-Nwosu

Contact details: dsl@st-josephs-jun.croydon.sch.uk

**Nominated governor for safeguarding:**

Name: Delia Jameson

### ***London Borough of Croydon***

**Local Authority Designated Officer (LADO):**

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LADO: Jane Parr

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**MASH (Multi-Agency Safeguarding Hub):**

For urgent child protection matters requiring immediate attention: Tel: 0208 255 2888 (9-5pm)

Professionals Consultation Line: Tel: 0208 726 6464 (1-4.30pm)

Out of Hours line: 020 8726 6400 (5pm-9am)

MASH Service Manager: Jonathan Lung

Email: Jonathan.Lung@croydon.gov.uk

**Croydon Safeguarding Children Partnership (CSCP)**

Website: <https://croydonlcsb.org.uk/>

[Safeguarding learning & development](#)

Email: [CSCP@croydon.gov.uk](mailto:CSCP@croydon.gov.uk)

Tel: 0208 604 7275

## Core operational policies and procedures

## Purpose and Aims of this policy

This is statutory guidance from the Department for Education ('the Department') issued under Section 175 of the Education Act 2002, the Education (Independent School Standards) Regulations 2014, the Non-Maintained Special Schools (England) Regulations 2015, and the Apprenticeships, Skills, Children and Learning Act 2009 (as amended). Schools and colleges in England **must** have regard to it when carrying out their duties to safeguard and promote the welfare of children. For the purposes of this guidance children includes everyone under the age of 18 (KCSIE 2023). KCSIE also applies to providers of post 16 education as set out Education and Training (Welfare of Children) Act 2021

It is essential that **everybody** working in a school or college understands their safeguarding responsibilities and that no single person or agency will hold the full picture for a child/family. Safeguarding and promoting the welfare of children is **everyone's** responsibility. **Everyone** who comes into contact with children and their families has a role to play.

### Aims

- Ensure safe recruitment practice in checking the suitability of all staff and volunteers to work with children including the completion of risk assessments.
- Ensure staff are appropriately trained.
- Raise awareness of safeguarding/child protection issues amongst all staff and volunteers and of what to do if they have concerns.
- Ensure that volunteers are appropriately supervised.
- Ensure that procedures and expectations for identifying and reporting/recording cases, or suspected cases, of abuse to relevant agencies are robust.
- Ensure that links with relevant agencies are effective including working in partnership regarding child protection matters, including attendance at case conferences and core group meetings.
- Ensure the school environment is safe and is one in which pupils feel secure and are encouraged to talk freely about anything that concerns them.
- Ensure pupils know there are adults in the school who they can approach if they are worried about anything.
- Ensure the curriculum and other provision, including opportunities in the Health and Wellbeing/PSHE curriculum, develop and equip pupils with the skills needed to feel safe and adopt safe practices
- Support for pupils who have been abused or may be at risk of harm in accordance with any agreed child protection plan.
- Ensure we respond appropriately to any concern or allegation about a member of staff or volunteer.
- Ensure staff follow accepted "safe practice" principles when working with pupils.
- Ensure pupils are protected from all forms of harm.

## PART 1 Safeguarding Information for ALL Staff

### Induction and training

- The Headteacher will ensure that all staff are fully inducted, are made aware of the following policies of the Federation and that staff are fully aware of their role in implementing these:
  - Staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring)
  - Safeguarding and child protection policy and procedures (including information themes such as Child-on-Child abuse, contextual safeguarding, and Online Safety)
  - Behaviour policy (including measures to prevent bullying including cyberbullying, prejudiced based and discriminatory bullying.)
  - Staff code of conduct (may also be known as staff behaviour policy) including low-level concerns, allegations against staff and whistleblowing. It should also include acceptable use of technology including mobile phones and pupil/staff relationships and communication including social media.

- Safeguarding response to children who are absent from education, especially for long periods.
  - Role of the designated safeguarding lead and deputies
- Staff, including those not directly working with children, will be asked to confirm that they have received, read, and understood all relevant staff policies, including “*What to do if you are worried a child is being abused*” guidance and ‘*Keeping Children Safe in Education 2023 part 1*’.
  - The designated safeguarding lead will ensure that all staff are fully inducted with regard to the Federation child protection procedures and that they receive safeguarding and child protection training on two yearly basis as a minimum. This will include online safety.
  - The Headteacher will keep a central record of all statutory and other training undertaken by staff members, governors and volunteers.
  - Federation staff and governors will receive multi-agency safeguarding training at the level that is appropriate to their roles and responsibilities.
  - As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive specific training on their role and other relevant multi-agency training courses.
  - Schools/college staff will also receive training on Early Help and the MASH safeguarding referral process as part of their safeguarding training. They will understand what the services are for and how to access support through them. This will include also understand the difference between Section 17 (child in need) and Section 47 (suffering or likely to suffer significant harm).
  - Federation staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation (for example, via email, e-bulletins, and staff meetings).
  - **All staff** should know what to do if a child tells them they are being abused, exploited, or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
  - **All staff** should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. They should never be made to feel they are a problem or feel ashamed.
  - **All staff** should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful.

## **Safeguarding children**

### **Safeguarding: is about every child**

In relation to children and young people, safeguarding and promoting their welfare is defined in ‘Working together to safeguard children’ 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.

## Early help cases

Staff will identify children who need extra help at an early stage and provide help and support in order to prevent concerns from escalating. In particular, staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- children with disabilities and additional needs, including those with special educational needs (whether they have an EHCP or not)
  - young carers
  - if the child has a mental health need.
  - children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime.
  - children who frequently go missing from home, school or care.
  - children who are misusing drugs or alcohol.
  - children at risk of exploitation through modern day slavery and trafficking.
  - Children at risk of being radicalised or exploited.
  - A family member in prison or is affected by parental offending.
  - children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse.
  - Misusing drugs or alcohol themselves.
  - children who have returned home from care.
  - children who show early signs of abuse or neglect, including where there are concerns about the cumulative effect of low-level neglect.
  - is at risk of honour-based abuse such as Female Genital Mutilation (FGM) or forced marriage.
  - is persistently absent from education.
  - privately fostered children.
- Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school/college.
  - If the child requires an early help service from another agency, the Federation will make a referral to the Multi Agency Safeguarding Hub (MASH) for appropriate help and support. Staff will consult with parents *prior* to making any referral to discuss the matter and **gain consent** to refer the child.
  - Where the child is receiving an Early Help service, the Federation will work as part of the Team Around the Child/Family (TAC/F) and take up the role of lead professional where this is appropriate.
  - Early help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the Federation believes that this is not the case, consideration should be given making a referral for a statutory social work service.

## Child Protection: is those at risk of significant harm.

The Federation will carry out its duty to safeguard pupils which is:

- protecting children from maltreatment
- preventing impairment of children's health or development
- ensuring children are growing up in circumstances consistent with the provision of safe and effective care,
- and undertaking that role so as to enable children to have optimum life chances so they can enter adulthood successfully.

***For a list of definitions and indicators of abuse and neglect, see appendix 1. The Croydon Safeguarding Partnership threshold document can be found [here](#).***

Action may be needed to protect children and learners from specific safeguarding issues such as:

- Abuse: Neglect, physical, sexual and emotional (see KCSIE 2023, pages 9-11)
- Disguised compliance
- Children missing in Education (CME)

- Children who are home schooled ('Hidden Children')
- Radicalisation / extremism
- So-called 'Honour' Based Abuse (HBA)
- Breast Ironing
- Mental health concerns including self-harm
- Bullying including on-line (cyber) bullying and prejudice-based bullying
- Racism, disability, homophobic or transphobic abuse
- Gender based violence/violence against women and girls
- Domestic Abuse
- Poor parenting
- Child sexual exploitation and trafficking (CSE)
- The impact of new technologies on sexual behaviour
- Substance misuse
- Female Genital Mutilation (FGM)
- Forced marriage
- Fabricated or induced illness
- Faith abuse
- Gangs and serious violence (including Child Criminal Exploitation: County Lines)
- Private fostering
- Sexting (Youth Produced Sexual Imagery)
- Child-on-child abuse
- Teenage relationship abuse
- Serious Violent Crime
- Sexual violence
- Sexual harassment
- Children with family members in prison
- Children and the court system
- Homelessness
- Adverse Childhood Experiences (ACEs)
- Trauma and Attachment issues
- Up-skirting
- Knife Crime
- County Lines
- Modern Day Slavery
- Cybercrime

The Federation will seek advice from the MASH Professionals' Consultation Line to help make decisions on the child's level of need and the appropriate service to refer on for services. Staff will consult with the designated safeguarding lead for advice and to discuss the case prior to making any referral for services.

The MASH Professionals' Consultation Number is 0208 726 6464 (1-4.30pm, Monday to Friday).

All referrals for a children's social care service or Early Help will be made by way of the MASH Portal.

#### [MASH Referral](#)

Parental consent for referral will be sought *unless* there are concerns this may put the CYP at risk of additional harm or advised not to by a member of the MASH team. This links to specific areas such as allegations of sexual abuse, concerns of fabricated or induced illness or the parent is the alleged perpetrator, in which case a referral should be made regardless.

Staff will also share information and work in an integrated way to ensure a co-ordinated response from agencies to support families and meet the child's needs.

The Online tool [Report a child to your local council](#) directs you to the local children's social care contact number.

#### **Referral for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the designated safeguarding lead or their deputy are most likely to have the most complete safeguarding overview. Following consultation, the designated safeguarding lead should decide on whether to make a referral to children's social care via MASH. Children's social care assessments should consider where children are being harmed in contexts outside the home, so it is important that schools and colleges provide



as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual (extra familial) approach to address such harm.

Additional information is available here: [Contextual Safeguarding](#).

Where the referral raises concerns that the child is at risk of significant harm, the case will be passed on to Croydon's MASH team manager to triage and allocated to a social worker to gather relevant information from other agencies.

MASH will inform the Federation of the outcome of any referral they make and what action children's social care will be taking. This may include any of the following:

- Carrying out a child and family assessment to identify the child's needs and establish if the child is a **child in need** under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a **strategy meeting/discussion under child protection** procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action in order to protect the child.
- Providing interim services for the child and their family in the meantime whilst work is on-going (including details of appropriate services).
- Families may also be referred to Early help or signposted to universal services.

### **Children who need a Social Worker**

Children may have a social worker due to neglect, abuse or difficult family circumstances. Their experience can leave them vulnerable to further harm and we have a duty as professionals to help protect them. The local authority should communicate with the designated lead so they know if a child has a social worker and therefore enable them to make decisions which are in the best interest of the child's safety, welfare and educational outcomes.

Further documents which may assist in supporting these families can be found in [Review of children in need. Help, Protection, Education](#) concludes the review.

## **Child protection procedures**

### **Role of school/college**

The Federation will work to the following policy documents in order to support the protection of pupils who are at risk of significant harm.

Working together to safeguard children (*DfE 2018*)

- [Working together to safeguard children](#)

What to do if you're worried a child is being abused (*DfE2015*)

- [What to do if you're worried a child is being abused - Publications - GOV.UK](#)

The London Safeguarding Children Board child protection procedures

- [London Safeguarding Children Board: Child Protection Procedures](#)

Keeping children safe in education (DFE 2023)

- [Keeping Children Safe in Education](#)

Croydon Safeguarding Board local policies and procedures

- [CSCB local policies and procedures](#)

London Child Protection Procedures 2022

- [London Procedures](#)

*Other document links can be found within their relevant sections of this policy.*

In line with these policies and procedures, the Federation will:

- identify those pupils where there are child protection concerns and make a referral to MASH
- attend child protection case conferences in order to effectively share information about risk and harm

- contribute to the development and monitoring of child protection plans as a member of the core group
- carry out the school's role in implementing the child protection plan and continually monitoring the child's wellbeing, and liaising with the allocated social worker as required.

## Recognition

- Staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a pupil are reported to the designated safeguarding lead.
- **Staff should refer to Annex 3 for abuse indicators** or page 12 onwards of KCSIE, that may suggest a pupil may be at risk of suffering significant harm.
- Any concerns held by staff should be discussed in the first instance with the designated safeguarding lead or their deputy and advice sought on what action should be taken. Where required, advice can be obtained from the Professionals Consultation Line on a no-names basis.
- Concerns may be monitored over time and should be recorded on a Cpoms shown such as the example in appendix 2 **or** logged within an electronic system. Details of any concerning incidents should also be recorded on this form.
- All staff should know what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.
- **All** staff should be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face.

## Records

- All safeguarding monitoring records and Child protection records relating to pupils are highly confidential and will be kept in a designated welfare file separate to the pupil's education records. These records will be securely held within the school/college.
- The designated safeguarding lead is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.
- All information should be recorded on the Cpoms, all staff have access to this reporting system.
- Records should show:
  - what the concerns were.
  - whether information of the concern was shared with the parent and what their response was.
  - Where relevant, what action was taken to refer on concerns or manage risk within the school/college.
  - whether any follow-up action was taken.
  - how and why decisions were made.
  - Outcomes
- Any incidents, disclosures or signs of neglect or abuse should be fully recorded with dates, times and locations. Records should also include a note of what action was taken and outcomes.
- The Cpoms must be completed.
  - whenever concerns arise or there is a serious incident **or**
  - where a child is being monitored, prior to a case conference or core group meeting.
- When a child who transitions to a new educational provision, the master file is passed to the designated safeguarding lead at the new school, transferred securely and confirmation of receipt obtained. Designated Leads should also consider if there is a need to share any key information about the family ahead of their start date. This may assist the new school in planning appropriate support for the family.

- A copy of child protection & safeguarding file should be retained by the school and kept in line with the school's information retention schedule. Child protection & safeguarding records must be disposed of as confidential waste.

### **Dealing with disclosures**

If a pupil discloses to a member of staff that they are being abused, the member of staff should.

- listen to what is said without displaying shock or disbelief and accept what the child is saying.
- allow the child to talk freely.
- reassure the child but not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to children's social care.
- reassure the child that what has happened is not their fault and that they were right to tell someone.
- not ask direct questions but allow the child to tell their story.
- not criticise the alleged perpetrator.
- explain what will happen next and who has to be told.
- make a formal record and pass this on to the designated safeguarding lead.

### **DO NOT DELAY**

- Tell the Designated Safeguarding Lead as soon as you can – it may be necessary to interrupt a lesson to do this – do not leave notes in the Designated Safeguarding Lead's pigeon hole as they may not get back to check their post until the end of the day once the pupil has gone home.
- Early referral gives more time to offer help to the pupil and family before the situation becomes more serious.
- When the matter is already severe or serious, early referral gives more time for others to protect the pupil.
- The Designated Safeguarding Lead may consult the MASH.

### **MAKE WRITTEN NOTES**

- At the earliest opportunity make a written record of your concerns, these can then be added to your school's formal reporting system - record facts accurately and do not express opinion - these notes will help to ensure accuracy in recalling events later - notes should be legible, signed and dated/time.
- Do not take photographs of any physical injuries, record on a body map. Do not use audio to record disclosures.
- Any original notes must be given to the Designated Safeguarding Lead as soon as possible and kept, even if you are using an online reporting system.

### **Referral**

- Where possible, a decision on whether or not to refer a pupil to MASH should be made by the designated safeguarding lead or their deputy following a discussion with the member of staff who has raised concerns. However, this should not delay any referral and *any* member of staff may make a referral if this is necessary but staff should discuss the matter with a member of the senior management team and take advice from the MASH team social worker. The designated safeguarding lead should be informed as soon as possible.
- Referrals should be in writing using a MASH safeguarding referral form completed either by the teacher raising concerns or by the designated safeguarding lead. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing via the MASH safeguarding referral form within 48 hours.
- Where there is any doubt about whether the concerns raised meet the thresholds for a child protection referral, the designated safeguarding lead may discuss the case on a "no names" basis with the MASH Professionals' Consultation Line to obtain advice on how to proceed.
- Parental consent must be sought prior to the referral being made unless to seek consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

- If the child already has an allocated social worker, the referral should be made directly to them. If the child is not already known to children's social care, referrals should be made to MASH. If the child lives outside Croydon, a referral should be made to their home local authority.
- All referrals will be acknowledged by the MASH and the referrer informed of what action will be taken.
- If the Federation does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with children's social care via the designated safeguarding lead.

### **Attendance at Case Conferences, Core Groups and Child in Need Meetings**

- The designated safeguarding lead will liaise with children's social care to ensure that all relevant information held by the Federation is provided to children's social care during the course of any child protection investigation.
- The designated safeguarding lead will ensure that the Federation is represented at child protection case conferences and core group meetings:
  - where possible, a member of staff who knows the child best, such as a class teacher or head of year will be nominated to attend
  - failing that, the designated safeguarding lead or their deputy will attend.
  - if no-one from the Federation can attend, the designated safeguarding lead will ensure that a report is made available to the conference or meeting.

### **Monitoring**

Where a pupil is the subject of a child protection plan, and the Federation has been asked to monitor their attendance and welfare as part of this plan.

- monitoring will be carried out by the relevant staff member in conjunction with the designated safeguarding lead.
- all information will be recorded on the child protection Cpoms shown at appendix 2 or similar, prior to each conference and core group meeting.
- the completed monitoring form will be kept on the pupil's separate child protection file (that should be separate from the school record) and copies made available to all conferences and core group meetings.
- the designated safeguarding lead will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing.

### **Confidentiality and Information Sharing**

**KCSIE 2023 tells us that**

***The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.***

**Further information on information sharing can be found:**

- [Chapter 1 – Working Together to safeguarding children](#)
  - [Information Sharing: Advice for Practitioners](#)
  - [Information Commissioner's Office](#)
  - [Data Protection Toolkit for Schools](#)
- All information obtained by Federation staff about a pupil will be kept confidential and will only be shared with other professionals and agencies with the family's consent.
  - If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have sufficient understanding of the issues. Young people aged

16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act. Otherwise, consent should be sought from parents.

- Where a child is at risk of suffering significant harm, schools and colleges have a legal duty to share this information with children's social care and make appropriate referrals. Equally, where a child is subject to a child protection investigation, schools and colleges must share any information about the child requested by children's social care.
- Parental consent to making a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before taking this step, schools and colleges should consider the proportionality of disclosure against non-disclosure. Is the duty of confidentiality overridden by the need to safeguard the child?
- Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation or cause undue delay in taking action to protect the child. However, schools should discuss this with the MASH Professionals Consultation Line on a "no names" basis to gain advice on whether this course of action should be taken.
- Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.
- In the event that a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality, but must explain why they have to pass the information on, to whom and what will happen as a result. Parents should also be made aware of the Federation's duty to share information.
- Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the MASH Professionals Consultation Line.

### **Working with Parents and Carers**

The Federation recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of pupils.

The Federation will:

- make parents aware of the Federation's statutory role in safeguarding and promoting the welfare of pupils, including the duty to refer pupils on where necessary, by having a safeguarding statement on the home page of their website and making all Federation policies available on the Federation website or on request.
- provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff.
- consult with and involve parents and carers in the development of Federation policies to ensure their views are taken into account.
- ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- provide advice and signpost parents and carers to other services and resources where pupils need extra support.
- Schools should also be aware of the additional guidance available from the DfE on dealing with issues around parental responsibility: [Understanding and dealing with issues relating to parental responsibility](#)

### **Multi-agency Working**

- The Federation will work in partnership with relevant agencies in order to meet its obligations under section 11 of the Children Act 2004 and *Working together to safeguard children* 2018.
- The Federation recognises its vital role in safeguarding school-age children and will co-operate with the Croydon Safeguarding Children Board to ensure joint working with partner agencies in order to improve outcomes for children in Croydon.

### **Inspection**

- Since September 2019 since Ofsted's Inspection of schools, early years and Post-16, inspectors will judge whether establishments are effective in their provision of safeguarding. [Ofsted Education Inspection Framework](#). Additional guidance for Early Years is available [here](#). Independent schools are inspected through the Independent Schools Inspectorate (ISI) and their inspection framework can be found [here](#).

## **Safeguarding Issues**

**The Law – KCSIE 2023 Page 24 sets out legal requirements around safeguarding. These include**

[The Human Rights Act 1998](#)

[Equality Act 2010](#)

[Equality and Human Rights Commission](#)

### **Child-on-Child abuse**

Child-on-child abuse is where a pupil's behaviour is likely to cause significant harm to other pupils.

This is most likely to include, but not limited to:

- bullying (including cyberbullying).
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm.
- sexual violence and sexual harassment.
- gender-based violence.
- sexting (also known as youth produced sexual imagery).
- initiation/hazing type violence and rituals.
- 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. It is now a criminal offence and may constitute sexual harassment. (Voyeurism (Offences) Act 2019)

This type of abuse should never be tolerated or passed off as "banter" or "part of growing up". Different gender issues can be prevalent when dealing with child-on-child abuse. This could for example include girls being sexually touched/assaulted or boys being subject to initiation-type violence. The Federation will refer the perpetrator and the victim to children's social care via MASH

### **Child on child sexual behaviour, sexual violence and harassment**

Schools and colleges (including 6<sup>th</sup> forms) should respond to **all** reports and concerns of child-on-child sexual violence and sexual harassment, including those that have happened outside of the school or college premises, and or online (what to look out for, and indicators of abuse are set out in Part one KCSIE 2023).

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to college age. They can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. All staff working with children are advised to maintain an attitude of **'it could happen here' and know we have ZERO-Tolerance to child-on-child harassment, abuse and violence.**

Sexual violence and sexual harassment can occur online and offline (both physical and verbal) and are never acceptable.

### **Sexual Violence**

When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003. Rape, assault by penetration, sexual assaults and causing someone to engage in sexual activity without their consent are crimes. (*Definitions of categories can be found on page 104 KCSIE 2023*). Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to MASH. Whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. Where an alleged incident took place away from the school or online but involved pupils from the school, the school's duty to safeguard pupils remains the same. The designated safeguarding lead (or deputy) should ensure they are engaging with children's social care and specialist services as required. Where there has been a report of sexual violence, it is likely that professional risk assessments by social workers and or sexual violence specialists will be required.

## Consent

KCSIE tells us that *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.*

### **The following situations are statutorily clear and do not allow for contrary decisions:**

- A child under the age of 13 can never consent to sexual activity.
- The age of consent is 16.
- Sexual intercourse without consent is rape.
- Rape, assault by penetration and sexual assault are defined in law.
- Creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Further information on consent can be found [HERE](#).

## Sexual Harassment

KCSIE 2023 tells us that *When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline and both inside and outside of school/college. When we reference sexual harassment, we do so in the context of child-on-child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.*

Examples include:

- sexual comments
- sexual “jokes” or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes.
- displaying pictures, photos or drawings of a sexual nature
- upskirting and
- online sexual harassment. Further examples can be found on page 106 KCSIE 2023.

## Harmful Sexual Behaviour

This is where sexual behaviour ranges from developmentally ‘normal’ to inappropriate, problematic, abusive and violent. Harmful Sexual Behaviour HSB is widely used as an overarching term and can happen online or face-to-face. When considering HSB, both ages and the stages of development of the children are critical factors. Full details can be found in KCSIE 2023 Page 107

## Policy

- Schools/colleges recognise that sexual violence and sexual harassment between pupils is a serious safeguarding issue and such behaviour will not be tolerated. Federation behaviour management and anti-bullying policies will reflect the Federation’s approach and staff and pupils will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.
- The Federation will follow the statutory guidance *Sexual violence and sexual harassment between pupils* and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators and ensure a safe learning environment for all pupils. [Sexual violence and sexual harassment between children in schools and colleges](#)
- The Federation will take all necessary steps to put in place a planned PHSE curriculum to convey the Federation’s policy for preventing harmful sexual behaviour and to promote respectful behaviour between pupils with regards to sexual conduct. The Federation will also make close links to the new [Relationships Education Curriculum](#) which is compulsory for all schools from September 2020.
- The Federation will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the Federation and appropriate referrals made to the police and children’s social care.

- The Federation will ensure that staff and governors receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all pupils and staff.
- It should be noted that **ALL** reports of sexual harassment and violence should be taken seriously, but staff need to be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys. Children with additional needs are three times more likely to be abused.
- The Federation will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

## Procedures

- Not all children will directly tell a member of staff about their experience and staff need to know how to respond when overhearing a conversation or if they notice a change in the child's behaviour. Children who are victims of sexual violence and sexual harassment may find the experience stressful and distressing.
- The Federation will ensure there is a robust response to all incidents and will follow the procedures set out in Part 5 of the *Keeping children safe in education* statutory guidance.
- Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).
- Reported incidents will be investigated by the member of staff to whom the young person discloses in partnership with the designated safeguarding lead, who will also carry out a risk assessment to look at any continued risk to the victim or other pupils and staff from the alleged perpetrator within the Federation environment. Toolkits that will support the risk assessment process include: [Brook: traffic light tool](#).
- Where the allegation involves material posted online, the Federation will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance [Searching, screening and confiscation guidance](#) and [UKCIS Sexting in schools and colleges advice](#).
- The key consideration is for staff not to view or forward illegal images of a child. The highlighted advice provides more details on what to do when viewing an image is unavoidable and informing the designated safeguarding lead (or deputy), as soon as practically possible, if the designated safeguarding lead (or deputy) is not involved in the initial report.
- When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider: the victim, especially their protection and support, the alleged perpetrator(s) and all the other children (and, if appropriate, adult students and staff) at the school or college, especially any actions that are appropriate to protect them.
- The member of staff and designated safeguarding lead will write up a record of the investigation that will set out how the Federation will respond to the incident.
- The designated safeguarding lead may take advice from MASH Professionals' Consultation Line before making a decision. Possible outcomes include referral to Early Help Services, MASH, Learning Access and/or the police, or managing the matter internally under Federation behaviour policies.
- Where a referral will be made to children social care or the police, the designated safeguarding lead will discuss the issue with the relevant agency and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents.
- KCSIE states that Schools and colleges should carefully consider any report of sexual violence and/or sexual harassment. The designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the school's or college's initial response. Important considerations will include: the wishes of the victim in terms of how they want to proceed. This will however need to be balanced with the school's or college's duty and responsibilities to protect other children. the nature of the alleged incident(s), including whether a crime may have been committed and consideration of harmful sexual behaviour. the ages of the



children involved. the developmental stages of the children involved. any power imbalance between the children. if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature). that sexual violence and sexual harassment can take place within intimate personal relationships between peers. are there ongoing risks to the victim, other children, adult students or school or college staff. and other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

- The Federation will take any necessary action to continue to safeguard the victim and other pupils within the Federation environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of on-going police and children’s social care investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.
- Where necessary and appropriate, the Federation will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.
- Children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support. It is likely that children will “take sides” following a report and the Federation will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment. The Federation will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity.
- [The National Organisation for the Treatment of Abusers \(NOTA\)](#) provides support for professionals involved in work with, or related to, sexual offending.
- Federation will consult with **Part 5 KCSIE 2023** (*specifically pages 110-115*) when managing allegations of child-on-child sexual harassment or sexual violence. Federation will consider the 4 likely scenarios when managing reports of incidents
  - Manage internally
  - Early Help
  - Referral to Children’s social Care
  - Report to Police
- Risk assessing (479), safeguarding and supporting victims (530), Safeguarding and supporting the alleged perpetrator (540), disciplining alleged perpetrators (543) and safeguarding other children (552), can all be advised through the relevant paragraphs in KCSIE 2023.
- Federation will refer to paragraphs 527-529 with regards to unsubstantiated, unfounded, false or malicious reports and fully follow the recommendations/guidance of recording information and what to do when the report is found to be unsubstantiated, unfounded, false or malicious.

**What to do if you are informed that a parent is on the sex offenders register**

In this situation the Headteacher will be guided by parole conditions where relevant to keep children safe in school. This information must be treated as strictly confidential and will only be shared with the Designated Safeguarding Lead if appropriate.

**Additional procedures**

*Individual schools should record any additional procedures here or refer to any separate policies.*

*Sexual violence is defined as any act which is an offence under the Sexual Offences Act 2003, including rape, assault by penetration or sexual assault without the consent of the victim.*

*Sexual harassment is defined as unwanted sexual conduct likely to violate the victim’s dignity and/or make them feel intimidated, degraded or humiliated or create a hostile, offensive or sexualised environment. This includes making sexual comments or jokes, physical contact such as touching or interfering with clothing or displaying sexual images. It also includes online harassment.*

*When dealing with incidents, the Federation should ensure that the written report of the incident contains objective facts and sets out clearly the next steps to be taken, with the views of the victim clearly recorded. Schools/colleges should be aware of their equality duty as victims of sexual violence and harassment are more likely to be female but should follow the same procedures and ensure the same level of response for incidents involving male pupils or incidents where victim and perpetrator are the same sex.*

*Cases may be managed internally by the Federation under without referral to other agencies where the incident involves low-level concerns and is a "one-off" occurrence where there is no further risk to the victim or other pupils.*

*Schools/colleges should give careful thought to the day to day management of risk and support for the victim, taking into account the victim's views when considering practical issues such as separating the victim and perpetrator. However, schools/colleges must be able to justify any measures taken and that they do not interfere with the educational opportunities of either party.*

*Schools may wish to consider developing specific policies around responding to incidents of sexual violence and harassment towards staff members.*

*Schools/colleges need to ensure that staff and governors are able to take up training and support around relationships and child-on-child abuse and how these messages should be delivered within the PSHE curriculum. Sexual violence and harassment will also be addressed in general, whole-school safeguarding training delivered by the CSCB, with designated safeguarding leads receiving more intense training in view of their role.*

### **Contextual (Extra Familial) safeguarding for young people.**

The Federation is aware that as young people grow more independent, they may face more risk from safeguarding threats from outside of the home, either from within the community, at Federation or from their own peer group. Protecting children from these external risks is known as contextual safeguarding. School safeguarding policies must therefore reflect the needs of young people in their own communities. (Please see the school's annex to this policy).

Schools/colleges act as a protective factor in children's lives. Children who do not attend can become *hidden*, which means that schools/colleges are less able to help and protect them. Children who do not attend school may be at further risk of not achieving their educational potential. This could include the following groups.

- Children not attending school nor on a school roll, including children who have been excluded both on a permanent or an informal basis and for whom no suitable alternative provision is arranged.
- Children who fall under the heading 'educated at home', but may not be receiving effective, efficient and suitable education or any education. This includes some children who may not be known to their local authority (LA) or any agencies.
- Children attending unregistered schools, sometimes under the guise of being electively home educated.
- Children in alternative provision that is of insufficient quality or is not provided for the required hours.
- Children without a school place in LAs in which the protocols are not working well enough for hard-to-place children.

### **Children who run away/go missing**

Children who run away or go missing from home or care are vulnerable to criminal and/or sexual exploitation. If a school becomes aware of a child who is missing from home or care and that child has not been reported missing to the police, they should so use 101.

Running away may be an indicator of other problems and therefore referral to MASH should be considered. Early intervention after the first episode may prevent a child being exploited.

[Children who run away or go missing from home or care](#)

### **Child criminal exploitation – county lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, markets and seaside towns. Those involved with county lines will often go missing for a few days at a time. Children and young people involved in county lines may be considered as having been trafficked and be victims of criminal exploitation.

Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years.
- can affect any vulnerable adult over the age of 18 years.
- can still be exploitation even if the activity appears consensual.
- can involve force and/or enticement –based methods of compliance and is often accompanied by violence or threats of violence.
- can be perpetrated by individuals or groups, males or females and young people or adults.
- is typified by some form of power imbalance in favour of those perpetrating the exploitation.

Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status and access to economic or other resources. If you become aware of child or young person who may be at risk a referral should be made to MASH.

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

**KCSIE 2023 states:** All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and consensual and non-consensual sharing of nudes and semi-nudes images and/or videos<sup>9</sup> can be signs that children are at risk. Other safeguarding issues all staff should be aware of include:

### **Children at risk of Sexual Exploitation (CSE)**

Both Child Criminal Exploitation and Child sexual exploitation is a form of abuse that occurs when 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 in sexual or criminal activity a) in exchange for something the victim needs or wants, and/or b) for financial advantage or increased status of the perpetrator or facilitator. This abuse can occur with male or female, adults or children and can be a one-off event or a series. Criminal and sexual exploitation of females can present differently in girls to boys as well as potential indicators.

### **The three main types of child sexual exploitation:**

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.

### **Inappropriate relationships**

- Usually involves just one abuser who has inappropriate power – physical, emotional or financial – or control over a young person. The young person may believe they have a genuine friendship or loving relationship with their abuser.

### **Boyfriend/Girlfriend**

- Abuser grooms a victim by striking up a normal relationship with them, giving them gifts and meeting in cafés or shopping centres. A seemingly consensual sexual relationship develops but later turns abusive. Victims may be required to attend parties and sleep with multiple men/women and threatened with violence if they try to seek help.

### **Organised exploitation and trafficking**

- Victims are trafficked through criminal networks – often between towns and cities – and forced or coerced into sex with multiple men. They may also be used to recruit new victims. This serious organised activity can involve the buying and selling of young people.

### **Indicators of child sexual exploitation may include:**

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation.
- Gang-association and/or isolation from peers/social networks.
- Suspension, exclusion, or unexplained absences from school, college or work.
- Leaving home/care without explanation and persistently going missing or returning late.
- Excessive receipt of texts/phone calls.

- Returning home under the influence of drugs/alcohol.
- Inappropriate sexualised behaviour for age/sexually transmitted infections.
- Evidence of/suspicions of physical or sexual assault.
- Relationships with controlling or significantly older individuals or groups.
- Multiple callers (unknown adults or peers).
- Frequenting areas known for sex work.
- Concerning use of internet or other social media.
- Increasing secretiveness around behaviours. and
- Self-harm or significant changes in emotional well-being.

### **Potential vulnerabilities**

Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues.

- Having a prior experience of neglect, physical and/or sexual abuse.
- Lack of a safe/stable home environment, now or in the past (domestic violence or parental substance misuse, mental health issues or criminality, for example).
- Recent bereavement or loss.
- Social isolation or social difficulties.
- Absence of a safe environment to explore sexuality.
- Economic vulnerability.
- Homelessness or insecure accommodation status.
- Connections with other children and young people who are being sexually exploited.
- Family members or other connections involved in adult sex work.
- Having a physical or learning disability.
- Being in care (particularly those in residential care and those with interrupted care histories).
- Sexual identity.

If a school becomes aware of child that may be being sexual exploited, they should refer to MASH.

[Child sexual exploitation – DfE guidance](#)

### **Serious Violent Crime - people at risk from gang activity or serious youth violence**

Schools/colleges are a source of safety and security for many young people. Supporting young people to build resilience and raise their awareness of the risks associated with gangs and serious youth violence is key to helping keep young people safe in their communities.

Staff should be aware of the indicators which may signal that children are at risk from, or are involved with serious violent crime. These may include:

- Increased absence
- Change in friendship groups
- Relationships with older individuals or groups
- Signs of self-harm or significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions

These may indicate involvement or approach by criminal networks or gangs.

Schools/colleges need to be alert to the possibility of children and young people bringing weapons onto their site. There are various reasons why a young person may be carrying a weapon. These should be explored with the young person.

Under Croydon's weapons in schools protocol the police must be informed via 101 of any pupil found in possession or a weapon in school or any weapon that is found on the school site.

[Preventing youth violence and gang involvement](#)

### **Domestic abuse and/or sexual violence**

Exposure to domestic abuse can have a significant impact on children's emotional development and mental health. The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first

ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear or experience the effects of abuse.

The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including physical, emotional and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

## **Operation Encompass**

Croydon is part of the Operation Encompass service which operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead) in school before the child or children arrive at school the following day. This ensures that the school has up to date relevant information about the child’s circumstances and can enable immediate support to be put in place, according to the child’s needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to children’s social care if they are concerned about a child’s welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website. (KCSIE 2023)

**National Domestic Abuse Helpline** - Refuge runs the National Domestic Abuse Helpline, which can be called free of charge and in confidence, 24 hours a day on 0808 2000 247.

Schools should refer young people who are victims of domestic or sexual violence to MASH.

Further advice and guidance can be obtained from the Family Justice Centre who can be contacted by phoning their helpline of 0208 688 0100 or by emailing [fjc@croydon.gov.uk](mailto:fjc@croydon.gov.uk)

**Additional advice** on identifying children who are affected by domestic abuse and how they can be helped is available at:

- NSPCC- UK domestic-abuse Signs Symptoms Effects • Refuge what is domestic violence/effects of domestic violence on children
- Safelives: young people and domestic abuse.
- Domestic abuse: specialist sources of support - GOV.UK ([www.gov.uk](http://www.gov.uk)) (includes information for adult victims, young people facing abuse in their own relationships and parents experiencing child to parent violence/abuse)
- Home: Operation Encompass (includes information for schools on the impact of domestic abuse on children)

Specific guidance on adolescent to parent violence and abuse is published by the Home Office

[Adolescent to parent violence and abuse \(APVA\)](#)

## **Prevention of Radicalisation and Extremism**

The Federation’s safeguarding duty includes the duty to promote British values in order to counter the extremist narrative and prevent young people from being radicalised and drawn into terrorism.

[Promoting fundamental British values as part of SMSC in schools](#)

Under Counter-Terrorism and Security Act 2015, the Federation also has a duty to refer young people on to Croydon’s Channel Panel under the Prevent strategy where there are concerns that they are being radicalised.

[The Prevent Duty](#)

Where a Federation has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a

younger pupil may be at risk due to their parent's radicalisation, the Federation should make a referral to MASH using the MASH Safeguarding Referral Form.

### **Risk indicators of vulnerable pupils**

#### **Indicators of an identity crisis include the following:**

- Distancing themselves from their cultural/religious heritage
- Uncomfortable with their place in society

#### **Indicators of a personal crisis include the following:**

- Family tensions
- A sense of isolation
- Low self-esteem
- Disassociation from existing friendship groups
- Searching for answers to questions about identity, faith and belonging

#### **Indicators of vulnerability through personal circumstances include the following:**

- Migration
- Local community tensions
- Events affecting their country or region of origin
- Alienation from UK values
- A sense of grievance triggered by personal experience of racism or discrimination

#### **Indicators of vulnerability through unmet aspirations include the following:**

- Perceptions of injustice
- Feelings of failure
- Rejection of civic life
- Indicators of vulnerability through criminality
- Experiences of dealing with the police
- Involvement with criminal groups

#### **Critical indicators include where the pupil is:**

- In contact with extremist recruiters
- Articulating support for extremist causes or leaders
- Accessing extremist websites
- Possessing extremist literature
- Using extremist narratives and a global ideology to explain personal disadvantage
- Justifying the use of violence to solve societal issues
- Joining extremist organisations
- Making significant changes to their appearance and/or behaviour

#### **When making a judgement, staff may consider the following questions:**

- Does the pupil have access to extremist influences?
- Does the pupil access the internet for the purposes of extremist activities?
- Has the pupil witnessed or become the victim of racial or religious hate crimes?
- Does the pupil vocally support terrorist attacks, either verbally or in their written work?
- Is there a pattern of regular or extended travel within the UK?
- Does the pupil have experience of poverty, disadvantage, discrimination or social exclusion?
- Does the pupil have insecure, conflicted or absent family relationships?
- Has the pupil experienced any trauma in their lives, particularly trauma associated with war or conflict?
- Is there evidence that a significant adult or other person in the pupil's life has extremist views or sympathies?
- Is the pupil the victim of social isolation?

**Educate Against Hate**, a website launched by Her Majesty's Government has been developed to support and equip school and college leaders, teachers, and parents with information, tools and resources (including on the promotion of fundamental British Values) to help recognise and address extremism and radicalisation in young people.

**Channel** is a programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. It provides a mechanism for schools to make referrals if

they are concerned that an individual might be vulnerable to radicalisation. An individual's engagement with the programme is entirely voluntary at all stages.

*Schools should always be a safe space for young people to explore new ideas and perspectives, and develop their critical thinking skills. Where there are concerns about radicalisation and a referral to Channel Panel is being considered the Federation should discuss these concerns internally and also consider external advice and guidance where necessary and appropriate.*

*The Federation designated safeguarding lead should be consulted for internal advice on making a referral. Prior to making a referral the school may also speak to and get advice from their police schools officer (if they have one). the MASH Professionals' Consultation Line. and/or Croydon's Prevent Co-ordinator (Haydar Muntadhar: email [haydar.muntadhar@croydon.gov.uk](mailto:haydar.muntadhar@croydon.gov.uk). tel. 0208 726 6000 (ext. 62070)*

#### **Additional procedures**

*Individual schools should record any additional procedures here or refer to any separate policies*

### **Mandatory reporting of Female Genital Mutilation (FGM)**

FGM refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons and is illegal in the UK. FGM typically takes place between birth and around 15 years old. however, it is believed that the majority of cases happen between the ages of five and eight.

#### **Risk factors for FGM include:**

- low level of integration into UK society
- mother or a sister who has undergone FGM
- girls who are withdrawn from PSHE
- visiting female elder from the country of origin
- being taken on a long holiday to the country of origin
- talk about a 'special' procedure to become a woman

#### **Symptoms of FGM**

FGM may be likely if there is a visiting female elder, there is talk of a special procedure or celebration to become a woman, or parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays), or parents who wish to withdraw their children from learning about FGM.

#### **Indications that FGM may have already taken place may include:**

- difficulty walking, sitting or standing and may even look uncomfortable.
- spending longer than normal in the bathroom or toilet due to difficulties urinating.
- spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- frequent urinary, menstrual or stomach problems.
- prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. withdrawal or depression) on the girl's return
- reluctance to undergo normal medical examinations.
- confiding in a professional without being explicit about the problem due to embarrassment or fear.
- talking about pain or discomfort between her legs

The Federation will follow the statutory guidance on FGM in order to safeguard girls who are at risk of FGM:

[Multi-agency statutory guidance on female genital mutilation](#)

Where a pupil makes a disclosure of FGM, the Federation will follow the mandatory reporting rules and make appropriate referrals to the police and MASH using the MASH Safeguarding Referral Form.

**So-called 'honour-based' abuse (HBA)** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including **Female Genital Mutilation FGM** (mentioned above), forced marriage, and practices such as breast ironing.

**Breast Ironing** is practiced in some African countries, notably Cameroon. Girls aged between nine and 15 have hot pestles, stones or other implements rubbed on their developing breasts to stop them growing further. Breast Ironing is usually carried out by mothers or other women to protect girls from men. It is believed that the reason they carry out this procedure is to reduce the risk of sexual harassment, rape, kidnap and forced marriage. Indicators that Breast Ironing has been carried out are chest pains or other discomfort, changes in behaviour and fear of undressing.

If a school becomes aware of a child that may be at risk of a **forced marriage**, they should in the first instance to MASH. If a child is at immediate risk, they should contact the police.

Further advice on forced marriage can be obtained from the Foreign and Commonwealth Office's Forced Marriage Unit by phone 0207 008 0151 or emailing [fmfu@fco.gov.uk](mailto:fmfu@fco.gov.uk)

[Forced marriage - FCO Guidance](#)

All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Where staff are concerned that a child might be at risk of HBA, they must contact the Designated Safeguarding Lead as a matter of urgency.

## **Modern Day Slavery and the National Referral Mechanism**

Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including: sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the NRM is available in the Modern Slavery Statutory Guidance. Modern slavery: how to identify and support victims - GOV.UK

[www.gov.uk](http://www.gov.uk)

## **Children Requiring Mental Health Support**

Schools and Colleges play a key role in supporting the emotional health and well-being of pupils. In some cases, mental health can be an indicator of abuse and all provisions should have clear procedures on how to access the appropriate support for these children.

More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Children who have experienced abuse and Adverse Childhood Experience (ACEs) through traumatic events are likely to be impacted. Only appropriately trained professionals should make diagnosis. The Additional documents listed below may also assist in supporting children and young people. See [Rise Above](#) for links to all materials and lesson plans.

Guidance and policies relating to a range of topics can be found on the [CSCB website](#).

## **Online Safety**

As part of their duty to provide a safe learning environment and schools should ensure their pupils know how to remain safe online.

There is considerable risk to children online, but they can be categorised within these three areas as stated within KCSIE:

### **content:**

- being exposed to illegal, inappropriate or harmful content. for example: pornography, fake news, racist, misogynistic, self-harm, suicide, anti-Semitic, radical and extremist.

### **contact:**

- being subjected to harmful online interaction with other users. for example: peer to peer pressure, commercial advertising and adults posing as children or young adults for the purposes of grooming children. and

### **conduct:**

- personal online behaviour that increases the likelihood of, or causes, harm. for example, making, sending and receiving explicit images, sharing others explicit images and online bullying.

### **commerce:**

- risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group (<https://apwg.org/>).

The DfE published [Teaching Online Safety in Schools](#) identifying the importance of including reporting and acting on online safety concerns within the Child Protection Policy, school behaviour policy and bullying policy.



Governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system.

Pupils should be just as clear about what is expected of them online as offline. A recommended framework published by UK Council for Child Internet Safety (UKCCIS) supports the delivery of online safety.

[Educated for a Connected World](#).

The Federation is aware that some pupils may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, children's social care or other agencies in order to overcome problems or keep them safe. Educating children and young people to stay safe online is crucial in the modern world. Other websites that can assist are.

[Be internet legends](#)

[Disrespect Nobody](#)

[PSHE Association](#)

[ThinkUKnow](#)

[Safer Internet centre](#)

[360 Safe Website](#) has a free online self-assessment tool for schools.

### **Remote Learning**

Where children are being asked to learn online at home the Department has provided advice to support schools and colleges do so safely: safeguarding in schools colleges and other providers and safeguarding and remote education. The NSPCC and PSHE Association also provide helpful advice:

NSPCC Learning - Undertaking remote teaching safely during school closures

PSHE - PSHE Association coronavirus hub Filters and monitoring

### **Filtering and Monitoring**

KCSIE states that *whilst considering their responsibility to safeguard and promote the welfare of children and provide them with a safe environment in which to learn, governing bodies and proprietors should be doing all that they reasonably can to limit children's exposure to the above risks from the school's or college's IT system. As part of this process, governing bodies and proprietors should ensure their school or college has appropriate filters and monitoring systems in place. Governing bodies and proprietors should consider the age range of their children, the number of children, how often they access the IT system and the proportionality of costs vs safeguarding risks.*

The appropriateness of any filters and monitoring systems are a matter for individual schools and colleges and will be informed in part, by the risk assessment required by the Prevent Duty.

Schools and colleges will adhere to the DfE [Filtering and Monitoring Standards](#) in order to fulfil their duties.

The school or college will

- identify and assign roles and responsibilities to manage filtering and monitoring.
- review filtering and monitoring provision at least annually.
- block harmful and inappropriate content without unreasonably impacting teaching and learning.
- have effective monitoring strategies in place that meet their safeguarding needs.

Further guidance on filtering and monitoring can be found at: UK Safer Internet Centre:

"appropriate" filtering and monitoring.

<https://www.saferinternet.org.uk/advice-centre/teachers-and-school-staff/appropriate-filtering-and-monitoring>. Southwest Grid for Learning ([swgfl.org.uk](http://swgfl.org.uk)) have created a [tool](#) to check whether a school or college's filtering provider is signed up to relevant lists (CSA content, Sexual Content, Terrorist content, Your Internet Connection Blocks Child Abuse & Terrorist Content).

### **Reviewing Online Safety**

Due to ever evolving technology and associated risks, schools and colleges should be aware of the rapid changes and have regular reviews such as an annual review of their approach to online

safety. This should be supported by an annual risk assessment which reflects current risks children face online.

KCSIE provide the following advice which schools can refer to.

*UKCIS has published Online safety in schools and colleges: Questions from the governing board. The questions can be used to gain a basic understanding of the current approach to keeping children safe online; learn how to improve this approach where appropriate; and find out about tools which can be used to improve the approach. It has also published an Online Safety Audit Tool which helps mentors of trainee teachers and newly qualified teachers induct mentees and provide ongoing support, development and monitoring.*

## **Cybercrime**

Cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include.

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded.
  - denial of Service (Dos or DDoS) attacks or 'booting'. Attempts to make a computer, network or website unavailable by overwhelming it with internet traffic from multiple sources. and,
  - making, supplying or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets and Remote Access Trojans with the intent to commit further offence, including those above.
- Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime. If there are concerns about a child in this area, the designated safeguarding lead (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Note that Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety. Additional advice can be found at: [Cyber Choices](#), 'NPCC-When to call the Police' and National Cyber Security Centre - NCSC.GOV.UK

## **Looked after and Previously Looked After Children and Care Leavers**

The Federation recognises that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

The Federation's designated teacher for CLA and care leavers has specialist knowledge of the issues faced by this cohort and for this reason, the designated safeguarding lead will consult with the designated teacher to seek advice whenever there are concerns about the welfare of a looked after or previously looked after child or care leaver.

The Virtual School Head is the lead responsible officer for ensuring that arrangements are in place to improve the educational experiences and outcomes of a local authority's looked-after children, including those placed out-of-authority. More information about supporting children who are looked after in achieving their potential can be found in [Promoting the Education of Looked After Children](#).

### **Additional procedures**

*Individual schools should record any additional procedures here or refer to any separate policies Schools and colleges should be aware of the new duty to promote the education of previously looked after children. these are defined as children who have left the care system as a result of adoption or special guardianship order. It is recognised that these children may face the same difficulties and have the same vulnerabilities as looked after children.*

*Schools and colleges should also consider the potential vulnerability of relevant children. these are children who under the Leaving Care Act are children who are aged 16-17 and who were but are no longer looked after.*

*Many looked after young people in Croydon who are aged 16 and 17 who remain looked after may be living in semi-independent accommodation and are particularly vulnerable to a wide range of safeguarding issues*

*and it is imperative that the designated safeguarding lead links with the designated LAC teacher where safeguarding concerns are raised.*

### **Children who are lesbian, gay, bi, or trans (LGBT)**

Children being LGBT is not a safeguarding concern in itself, but it is important to be aware that they can be targeted by others. This can increase the vulnerability of these children. It is important to consider helping LGBT children to identify a trusted adult who they can talk to as well as provide safe places within school to talk about their concerns.

LGBT inclusion is part of [Relationships Education and Relationships and Sex Education curriculum](#). There is a range of support available to help schools address homophobic, biphobic and transphobic bullying and abuse.

### **Children with Special Education Needs and Disabilities (SEND)**

The Federation is aware that children with special education needs may face increased risk of harm and abuse and may be more likely to experience bullying.

They can face additional safeguarding challenges because.

- there may be assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.
- children with SEN and disabilities can be disproportionately impacted by things like bullying without outwardly showing any signs.
- difficulties may arise in overcoming communication barriers.
- there may be a higher risk of peer group isolation

Federation policies reflect these issues and recognise that staff need to be able to help this group to overcome barriers to seeking help. Schools/colleges should identify pupils who might need more support to be kept safe or to keep themselves safe. Further information can be found in the department's:

- [SEND Code of Practice 0 to 25 years](#), and
- [Supporting Pupils at School with Medical Conditions](#).

The Croydon Special Educational Needs and Disabilities Information and Support Services ([SENDIASS](#)). SENDIASS offer information, advice and support for parents and carers of children and young people with SEND.

### **Privately Fostered Children**

Private fostering is when a child under the age of 16 (under 18 if disabled) is cared for by someone who is not their parent but is a 'close relative' for 28 days or more. Schools have a legal duty to notify Croydon of any pupils they know to be private fostered. Designated safeguarding leads should refer to MASH any private fostering arrangements that come to their notice.

#### **Why are children in Private Foster Care?**

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents have moved away, but the child stays behind (e.g. to stay at the same school to finish exams)
- teenagers living separately from their own family
- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families

#### **Are children in private foster care defined as 'Local after Children'?**

No. The term 'Looked after Children' means children who are looked after by the local authority. Privately fostered children are outside the care of the local authority. Schools should not therefore code children in private foster care as 'LAC'.

### **Children staying with host families (homestay)**

Some schools and colleges make arrangements for their pupils to have learning experiences by staying with a 'host family' who are not related. It can be part of a foreign exchange visit and known as 'homestay' arrangements. Appendix E of KCSIE 2020 has further definition around this. In some cases where the family is within the UK, this could amount to private fostering under the Children's Act 1989 (see above).

### **Young Carers**

If schools have concerns about a pupil they believe to be a young carer, they can contact the Young Carers Service on 0208 649 9339.

Further details can be found on their website – [www.talkofftherecord.org](http://www.talkofftherecord.org)

### **Fabricated or Induced Illness**

Fabricated or induced illness (FII) is a rare form of child abuse. It occurs when a parent or carer, usually the child's biological mother, exaggerates or deliberately causes symptoms of illness in the child.

### **Homelessness**

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. 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 evicted from a property. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

### **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. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Children and the court system**

Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed and there are two [age appropriate guides](#) to support children. Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. This may be useful for some parents and carers.

### **Non-collection of children from school**

#### ***This section applies to primary schools only***

The school will put in place a policy regarding handing over children to adults who are not their parent or known carer at the end of the school day. Parents will be asked to provide the details of the person who will normally collect the child and will be informed of the need to notify the school in advance if this changes, giving details of the person authorised to collect the child. The school will also ensure that the details of at least two people who can be contacted in an emergency in the event that the child is uncollected.

Parents will also be asked to inform schools where children are subject to court orders that limit contact with a named individual.

In the event that anyone who is not authorised to do so attempts to collect the child, the school will not allow the child to leave but contact the parent immediately.

If a child is uncollected at the end of the school day, the school will follow the procedure agreed with children's social care:

- The schools will check with the child to see if there are any changes to arrangements for collection and try to make contact with the parent or other family members, and wait with the child until someone comes to collect them.
- Children will not be released into the care of another parent even where they offer to take the child home.
- The school will contact the MASH Professionals' Consultation Line to seek advice at 4.00pm if there are difficulties in contacting parents or other family members.
- If all possible means of contact have been exhausted and no contact can be made with the parent by 4.30pm, the school will contact MASH and if advised to do so the police, who will arrange to collect the child or make arrangements for the child to be transported to the children's social services office.
- The school will regularly ask parents to confirm and update contact details and to nominate a family member or friend who can collect the child in the event that they are unable to do so.
- Where children are regularly uncollected or collected late, this should be discussed with the designated safeguarding lead. If there are also child protection concerns, a referral should be made to children's social care via MASH.

### **Children who are absent from education**

Schools need to be aware of those children who are absent from school for prolonged periods or/and on repeated occasions as this may be an indicator of welfare concerns.

Multi-agency working is essential when children are absent from school and potentially at greater risk of harm. This includes liaising with social workers where a child is on a child in need or child protection plan or is looked after by the local authority. P45 of KCSIE provides the following recommendations

Guidance on school attendance 'Working together to improve school attendance' including information on how schools should work with local authority children's services where school absence indicates safeguarding concerns.

- Information regarding schools' duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points, can be found in the department's statutory guidance: Children Missing Education.
- further information for colleges providing education for a child of compulsory school age can be found in: Full-time-Enrolment of 14 to 16 year olds in Further Education and Sixth Form Colleges.
- general information and advice for schools and colleges can be found in the Government's Missing Children and Adults Strategy.

### **Elective Home Education (EHE)**

Many home educated children have a positive learning experience. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

DfE guidance for local authorities on [Elective home education](#) sets out the role and responsibilities of LAs and their powers to engage with parents in relation to EHE. Although this is primarily aimed at LAs, schools should also be familiar with this guidance.

### **Opportunities to Teach Safeguarding**

The Governing body should ensure the school provide opportunities for children to learn about Safeguarding. General issues may be addressed through the broad and balance curriculum already in the school but key issues relevant to the school community and sensitive issues may be taught through Relationships Education (all Primary pupils) and Relationships and Sex Education (all secondary pupils) and health Education (for all pupils in state funded schools) which is compulsory from September 2020. Schools are able to be flexible on how they teach this. DfE documents can be found [here](#).

The Department has produced a one-stop page for teachers on GOV.UK, which can be accessed here: [Teaching about relationships sex and health](#).

This includes teacher training modules on the RSHE topics and non-statutory implementation guidance.

The following resources may also help schools and colleges understand and teach about safeguarding:

DfE advice for schools: teaching online safety in schools.

UK Council for Internet Safety (UKCIS) guidance: Education for a connected world.

UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people.

The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors.

National Crime Agency's CEOP education programme: Thinkuknow.

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## **The Child's Wishes**

The best interest of the child should always be at the heart of any decision-making process around safeguarding. The Governing Body, school or college leaders should always make sure the child's wishes and feelings are taken into account when decisions for support are made, and actions taken.

## **Other relevant safeguarding guidance**

*Schools can access additional guidance, policies and procedures at:*

[CSCB local policies and procedures](#)

[CSCB Safeguarding in Education Toolkit](#)

[DfE Alternative Provision guidance](#)

[DfE School Attendance guidance](#)

[DfE School Attendance Parental Responsibility Measures guidance](#)

[DfE Behaviour in Schools guidance](#)

[DfE Preventing and Tackling Bullying guidance](#)

[DfE Children Missing Education guidance](#)

[DfE Best Practice Advice for School Complaints Procedures](#)

[DfE and ACPO Drug Advice for School guidance](#)

[DfE Advice for Schools on Equality Act 2010](#)

[Behaviour and Exclusions](#)

[DfE Supporting pupils at school with medical conditions](#)

[DfE Guidance on First Aid for Schools](#)

[DfE Mental health and behaviour in schools](#)

[DfE Use of reasonable force guidance](#)

[DfE Promoting fundamental British values as part of SMSC in Schools](#)

[DfE The Prevent Duty – Advice for Schools](#)

[DfE Sexual violence and sexual harassment between children in schools and colleges](#)

[DfE Children who run away or go missing from home or care](#)

[Child sexual exploitation – DfE guidance](#)

[Preventing youth violence and gang involvement](#)

[Safeguarding children who may have been trafficked](#)

[Criminal Exploitation of children and vulnerable adults: County Lines guidance](#)

[Preventing and tackling Bullying](#)

[Promoting children and young people's emotional health and wellbeing](#)

[Rise Above](#)

[Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, parents and carers](#)

[Domestic Abuse: Various information/Guidance](#)

[Faith Based Abuse](#)

[Relationship Abuse: disrespect nobody](#)

## **PART 2 Responsibility of Governors, Proprietors and Management**

Legislation and the Law which Governing Bodies and proprietors adhere to, can be found on pages 23-26 KCSIE 2023.

### **Croydon's Children Families & Education Directorate**

The Directorate includes services that will support the Federation to safeguard and promote the welfare of pupils by:

- co-ordinating the delivery of integrated children's services within the borough, including an early help service
- providing statutory social work services under the Children Act 1989/2004
- providing the Federation with advice, support and guidance, model policies and procedures, training and dedicated lead officers with responsibility for child protection, safeguarding and online safety
- dealing with allegations against members of staff and volunteers through the Local Authority Designated Officer (LADO)
- taking responsibility for those children who are not in education, including children who are known to be home educated.

### **Governing Board**

The term 'governors' and 'governing board' is used throughout to refer to whoever is responsible for fulfilling governance functions.

The Governing Board will ensure that the Federation meets its statutory duties with regard to safeguarding and protecting pupils and that the following are in place:

- The Federation has the following policies in place and that these are regularly monitored, reviewed and updated where necessary.
  - safeguarding policies and procedures covering early help and child protection that are consistent with Croydon Safeguarding Children Board procedures and Croydon's internal policies
  - a staff code of conduct policy including policies covering staff/pupil relationships and communications and staff use of social media
  - a procedure for responding to incidents where children go missing from education, particularly where there are repeated incidents that suggest potential safeguarding risks may be present.
- The school is able to work jointly with other agencies in order to ensure pupils can access help and support from early help services and statutory social work services and that children's plans are implemented and monitored.
- A member of staff is appointed as the Designated Manager to address allegations against school staff
- The Chair of the Governing Board is aware that they are responsible for liaising with the LADO in the event of an allegation against the head teacher.
- A senior member of staff is appointed as the designated safeguarding lead with responsibility for carrying out the statutory duties as set out in this policy, the individual is given sufficient time and resources to carry out their responsibilities and that another member of staff is appointed to deputise in their absence.
- There is a designated teacher nominated to promote the educational achievement of looked after children and previously looked after children and that this person has received appropriate training for the role.

- Staff receive a thorough induction on joining and are given copies of all relevant safeguarding and child protection policies and the staff code of conduct policy.
- Staff are confident that they can raise issues with leaders where there are concerns about safeguarding practice at the Federation and there are robust whistleblowing procedures in place.
- Steps are taken to ensure parents and pupils are aware of the Federation's safeguarding and child protection policies and procedures.
- Governors ensure children are given opportunities within the curriculum to learn how to keep themselves safe, including on-line.
- The Federation has appropriate written procedures in place to ensure safer recruitment practices and reasonable checks on visitors to the school, to deal with allegations against staff or volunteers and to report matters to the Disclosure and Barring Service as required, and that these policies are consistent with statutory guidance and reviewed on an annual basis.
- At least one member of the Governing Board has undertaken accredited safer recruitment training.
- There is a nominated member of the Governing Board who is responsible for Safeguarding and holds school accountable of their statutory duties.
- All staff receive safeguarding and child protection training every year and receive regular updates from the designated safeguarding lead to ensure they remain up to date with new legislation. Free safeguarding training is available for all Croydon schools via the [Learning & Development section of the CSCB website](#).
- The Federation has procedures in place to deal with allegations made against other pupils.
- Children's wishes and feelings are taken into account when deciding on what action to take or services to provide to protect individual children and there is a robust system in place for gaining feedback from pupils.

### **School and Headteacher**

The Headteacher will ensure that the Federation meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the school/colleges' safeguarding and child protection policies, behaviour policies and the CSCP children missing from education policy so that they are fully aware of their role in safeguarding children and are able to fully implement policies.
- All staff are able to identify those children who need extra help and know how to make, or request appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, are able to identify those children for whom there are child protection concerns and know how to make, or request appropriate referrals to children's social care.
- Staff are able to work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress and liaising with social workers.
- Staff are encouraged to attend learning events and participate in audit activity provided by the Safeguarding Children Partnership as well as promote published learning from events and serious case reviews.
- A Designated manager is appointed to manage allegations against staff
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The Federation offers a safe environment for staff and pupils to learn.
- Safeguarding issues are brought to the attention of the governing body.

## **PART 3 Safer recruitment**



## General Principles

The Federation recognises safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working in the Federation provider are suitable do to so and do not pose any kind of risk to children.

The Federation educator will follow the *Keeping Children Safe in Education* guidance (DfE 2023, part 3).

- The Federation will carry out extensive checks and enquiries on applicants for all positions, including voluntary and support roles and governors and those involved in the management of an independent school, in accordance with statutory requirements.
- No staff member, volunteer, governor or anyone involved in the management of an independent school, academy or free school will be allowed to take up posts if they have a section 128 direction. Further information on this can be found in the [Education and Skills Act 2008](#).
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school. Types of DBS checks can be found on Page 61 KCSIE 2023.
- All job advertisements and application forms will clearly state that the role is a safeguarding role and that applicants will be clear that safeguarding checks will be completed as part of safer recruitment practices. When shortlisting, it is good practice to advise candidates that online searches will be carried out.
- Staff and governors who normally sit on interview panels will have at least one member trained in safer recruitment and no interview should go ahead unless this is the case. Schools will take up the accredited safer recruitment training offered through the Croydon Safeguarding Children Board or any other accredited training provider.
- Although the Headteacher will have day-to-day responsibility for the recruitment of staff, the Governing Board will ensure that they maintain an overview of recruitment systems in order to scrutinise practise and ensure all statutory checks are carried out.
- Staff in school/colleges responsible for carrying out recruitment checks should ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children or a person moves into a post that is a regulated activity.
- In schools, the Headteacher will be responsible for keeping a single central record of all staff and volunteers (including governors) who work at the school.
- In colleges, the principal will be responsible for keeping a single central record of all staff that provides education to children.
- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained in the format shown at appendix 3.
- Where the Federation has salaried trainee teachers, the Federation will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on the single central record.
- For trainee teachers that are fee-funded, the school will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.
- Where staff are recruited via third parties such as employment agencies, the Headteacher will:
  - seek written confirmation from the agency that the agency has carried out all necessary checks on the individual
  - request written confirmation of the outcome of all checks
  - request written confirmation that an enhanced DBS certificate has been received by the agency
  - check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

## Checks to be carried out

Further descriptions about the types of checks can be found on pages 63-65 KCSIE 2023. Also available of the [DBS website](#). The DBS maintains 'barred lists' of those unsuitable to work with children and vulnerable adults.

In the recruitment and selection of staff and volunteers schools/colleges will at all times adhere to the government guidance contained within "Working Together to Safeguard Children" (July 2018) and 'Keeping Children Safe in Education (DfE 2023).

The Federation will verify the following information for **all** new staff and record on the single central register/record:

- The applicant's identity must be verified from their passport or other photographic ID and proof of address must be provided. Guidance on checking identity can be accessed at [GOV.UK](#)
- a standalone children's barred list check
- an enhanced DBS check (with children's barred list check) requested/certificate provided
- a prohibition from teaching check
- further checks on people who have lived or worked outside the UK (see paragraphs 279-284 KCSIE 2023)
- a check of professional qualifications, where required, and,
- a check to establish the person's right to work in the United Kingdom.

*Schools/colleges should be aware of the following central government guidance:*

Criminal records checks for overseas applicants - Publications - GOV.UK

Employing overseas-trained teachers from outside the EEA - Publications - GOV.UK

Disqualification by Association

DBS and Filtering

In addition:

- colleges **must** record whether the person's position involves 'relevant activity', i.e. regularly caring for, training, supervising or being solely in charge of persons aged under 18, and
- independent schools (including academies and free schools) **must** record details of the section 128 checks undertaken for those in management positions.

## Retention of Documents

The Federation will keep copies of the following documents on staff personnel files:

- documents used as proof of identity such as passports or driving licences.
- A copy of the DBS **does not** have to be kept. If schools/colleges choose to keep a copy, guidance should be sought through [GOV.UK](#) in order to adhere to the requirements of the Data Protection Act 2018.
- **Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10.** A copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications should be kept on their personnel file.
- For those who have lived or worked outside of the UK, they **MUST** undergo the same checks as all other staff in schools and colleges. Further guidance on these checks can be found on Page 72 KCSIE 2023.

If a school or college knows or has reason to believe that an individual is barred, it commits an offence if it allows the individual to carry out any form or regulated activity. There are penalties of up to five years in prison if a barred individual is convicted of attempting to engage or engaging in such work. (KCSIE 2023)

## Agency Staff

Schools and colleges must obtain written notification from the agency that the relevant checks have been completed before they work within the school/college. The written confirmation **MUST** contain state that the

certificate has been obtained. Where there is a disclosure of any matter or information on the certificate, the employment business **MUST** obtain a copy of the certificate from the agency.

It is recommended that schools should also check the identity of the person presenting themselves, is the same person whom the checks have been completed for.

## **Volunteers**

Under no circumstances will a volunteer on whom no checks have been obtained be left unsupervised or allowed to work in regulated activity.

The Headteacher will ensure that the following are carried out in relation to unpaid volunteers such as parents who accompany pupils on school outings or provide help in the classroom:

- All volunteers will be required to undergo a recruitment process, such as references, DBS and other checks and interviews that is appropriate and proportional to the duties assigned to them.
- Volunteers who are carrying out a regulated activity, for example being left unsupervised with children or providing personal care to children will be subject to an enhanced DBS check, including barred list information.
- New volunteers who are not carrying out regulated activity but who have an opportunity for regular contact with children will be subject to an enhanced DBS check but this may not include a barred list check.
- For other volunteers who are not carrying out regulated activity and do not have regular contact with children, the Headteacher will carry out a risk assessment to decide whether an enhanced DBS check should be carried out depending on:
  - the nature of the role
  - what information is already known about the volunteer
  - what references from work or volunteering activity the volunteer has provided regarding suitability
  - whether the role is eligible for an enhanced DBS check.
- The Federation will ensure that all volunteers are competent to carry out the duties assigned to them and are only assigned duties that are suitable to their qualification and experience.
- Volunteers carrying out regulated activity but for whom a DBS check has not been carried out will be suitably supervised by teaching staff at all times at a level that ensures the safety of pupils.
- All volunteers will be fully inducted in relation to all school policies and procedures.

## **Trainee / Student Teachers**

Applicants for initial teacher training who are employed by the school/college, the Federation **must** make the necessary checks. If the student is fee funded, it is the responsibility of the training provider to carry out necessary checks. Written confirmation of checks should be obtained by school/college.

Schools and colleges have a legal duty to refer anyone to the DBS who has harmed, poses a risk of harm to a child or vulnerable adult. (Full details can be found in KCSIE 2023 P75)

## **References**

- Applicants will be asked to provide a full employment history and details of referees, including previous and recent employers, and who should be a senior member of staff with the authority to provide references. References should be sought **before** interviews and references from colleagues will not be acceptable.
- All references will be requested directly from the referee, including references for internal candidates. Referees will be contacted to resolve any issues that emerge from the references provided. Open references will not be accepted (e.g. to whom it may concern)
- References will be taken up from current employers of a senior level. If the applicant is not currently employed, verification of will be sought from their previous Federation as to the dates the applicant was employed and the reasons for leaving the post.

- Where an applicant is no longer working within a children's workforce setting, a reference from the most recent employer in the children's workforce should be sought.
- Any information provided by applicants as part of an application process will be verified with independent sources and any reference received electronically will be checked to verify the originating source.
- Schools and colleges should follow up gaps in previous employment
- Always verify any information with the person who provided the reference and ensure electronic copies come from a legitimate source
- Compare information on the reference to that on the application and follow up on discrepancies with the candidate
- Establish reasons for the candidate leaving their current or most recent post

### **DBS checks**

In order to ensure that people who work in the Federation are suitable to do so and are not barred from working with children, the Federation will apply to the Disclosure and Barring Service (DBS) for police checks and other barred list information as part of the recruitment process.

Where a DBS check indicates previous concerns, the Head should conduct a risk assessment as to the suitability of the applicant to the post. This risk assessment should take account of the level of offending, when the offences occurred and the circumstances around the offences. The assessment should be recorded and placed upon the personnel record of the applicant.

Full DBS checks which include barred list checks will only be taken out on individuals who are involved in regulated activity. This is defined as close, unsupervised contact on a regular basis involving activities such as:

- teaching
- training
- supervising
- care
- guidance and advice
- driving a vehicle
- personal or intimate care.

The activity must be carried out regularly as part of the staff member's day to day responsibilities and the checks will be reasonable in order to safeguard children.

Full DBS checks with barred list checks will also be carried out on permanent staff members working at the Federation or unpaid volunteers who regularly work unsupervised at the Federation and whose work means they have an opportunity for regular contact with children.

Other staff, contractors and supervised volunteers who have opportunities for regular contact with children but do not carry out a regulated activity will be subject to an enhanced DBS check but **not** barred list checks.

Decisions on whether a person is carrying out a regulated activity or whether their role provides opportunities for regular contact with children requiring a DBS check will be made by whoever is responsible for recruitment in the school, for example the head teacher or governor, and the following will be taken into consideration when deciding on this.

- the age of the children.
- their level of vulnerability.
- the numbers of children in the group.
- the nature of the role. and
- opportunities for contact with the children.

The Federation has robust procedures for day to day staff management and supervision and clear procedures for reporting and acting on concerns. Staff carrying out roles involving regulated activity will be suitably supervised on a regular basis by senior staff carrying out a similar role.

The Federation will ensure that all DBS checks carried out on staff are renewed after 3 years of the original DBS disclosure.

### **Alternative Provision**

The school remains responsible for the safeguarding of children of any pupils they place in Alternative Provision.

Whenever the school places a pupil with an Alternative Provider, the school will obtain **written confirmation** of the provider's safeguarding and child protection policies and that all relevant vetting and barring checks on individuals working at the establishment have been carried out.

All pupils placed in Alternative Provision should be visited regularly.

#### [Alternative Provision guidance](#)

Further information on all areas of the selection and recruitment process can be found on p43 of KCSIE 2023.

## **PART 4 Safeguarding Concerns and Allegations Against a Member of Staff**

### **Conduct and safe teaching practice**

- The Federation expects staff and volunteers to set a good example to pupils through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries.
- Procedures are in place for the two areas of allegation, those that MAY meet the threshold of harm and those that DO NOT meet the harm threshold (known as 'low-level concerns'.)
- The Headteacher will ensure that there is a written code of conduct in place and that each member of staff, including volunteers, signs a code of conduct agreement on appointment that sets out the Federation expectations with regards to standards of professional behaviour and that all staff receive copies of relevant policies.
- Governors will have their own separate code of conduct. This is a responsibility of the governing board.
- Staff will be expected to follow the school/colleges social media policy in terms of their use of social media, particularly in relation to professional standards and relationships with pupils and/or their families. All staff and volunteers will sign an acceptable use agreement before being given access to the Federation computer system.

In the event that an allegation is made against a member of staff or volunteer, the Federation will follow Croydon's procedures for managing allegations against a member of staff.

#### [The Management of Allegations against Staff who work with Children and Young People](#)

The Governing Board will appoint the Headteacher as the school Designated Manager for the purposes of the allegations procedures and who will link with the Local Authority Designated Officer (LADO) for all allegations raised. A further staff member will be identified as their deputy to act in their absence or if allegations are made against the responsible staff member.

**All** allegations in relation to staff members will be referred to the head teacher. Allegations against the head teacher will be referred to the Chair of the Governing Board.

### **Allegations that meet the harms threshold**

An allegation is any information which indicates that a member of staff/volunteer may have:

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

The last point includes behaviour that may have happened outside of school or college making them unsuitable to work with children. Known as *Transferable Risk*. Where appropriate an assessment of transferable risk to children with whom the person works should be undertaken. If in doubt seek advice from the local authority designated officer (LADO).

This applies to any child the member of staff/volunteer has contact within their personal, professional or community with police or children's social care. The person to whom an allegation is first reported should take the matter seriously and keep an open mind. S/he should not investigate or ask leading questions if seeking clarification. It is important not to make assumptions. Confidentiality should not be promised and the person should be advised that the concern will be shared on a 'need to know' basis only.

Actions to be taken include making an immediate written record of the allegation using the informant's words - including time, date and place where the alleged incident took place, brief details of what happened, what was said and who was present. This record should be signed, dated and immediately passed on to the head teacher/principal. If the concerns are about the head teacher/principal, the Chair of the Governing Board should be contacted.

The Headteacher will always consult the Local Authority Designated Officer (LADO) immediately the school is aware of an allegation.

Following consultation, the Headteacher in agreement with the LADO will decide on appropriate action and consider:

- Further Inquiries
- immediate referral to the Police
- consideration of disciplinary proceedings
- consideration of a senior strategy meeting

*Looking after the welfare of the child* - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children's social care as described in Part one of this guidance.

*Investigating and supporting the person subject to the allegation* - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

It is important to bear in mind that although the concern may relate to an individual pupil/student, other pupils/students may also be at risk. The procedures in "Safeguarding Children and Safer Recruitment in Education" (DfE, 2006 – Updated 2011), Working Together to Safeguard Children (July 2018) and Guidance for local authorities, head teachers, school staff, governing bodies and proprietors of independent schools" (DfE 2011) will be followed in such cases.

When appropriate (*see guidance above*), consideration will be given to referral of a member of staff to the DBS for consideration of the case. If a member of staff believes a reported allegation or concern is not being dealt with appropriately, they should report the matter to the Local Authority Designated Officer (LADO) to give support and direction on how to proceed.

All procedures set out in Part 4 of KCSIE 2023 will be adhered to alongside previously mentioned documents and used as guidance when managing allegations of any kind.

Where a teacher's employer, including an agency, dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left first, they must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency). Details about how to make a referral to the Teaching Regulation Agency can be found on GOV.UK.

### **Concerns that do not meet the harm threshold - Low Level Concerns**

***All concerns regarding the conduct of staff working with children should be referred to the LADO to consider whether the threshold for LADO involvement is met.***

Following on from submissions made by the London LADO Regional Group to the London Safeguarding Partnership, the London procedures have been altered to reflect the need to consult with the LADO on Low Level concerns.

### **Allegations Against Staff and Volunteers, including supply staff**

Agencies are encouraged to ensure that they have a **code of conduct** in place which clearly includes references to behaviours/relationships between people in a position of trust and those for whom they are responsible that are over the age of 18; this includes the **need for "low level" concerns to be discussed with the LADO and for them to be recorded.**

Governing bodies and proprietors should have policies and processes to deal with concerns (including allegations) which do not meet the harm threshold set out above. These could include suspicion, complaint, or disclosure made by a child, parent, or other adult within or outside of the organisation. or as a result of vetting checks undertaken.

It is important to have appropriate policies and processes in place to manage and record any such concerns and take appropriate action to safeguard children.

### **Low level concerns**

As part of their whole school approach to safeguarding, schools and colleges should ensure that they promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) can be raised and dealt with promptly and appropriately.

Creating a culture in which all concerns about adults or their behaviour towards children, (including allegations that do not meet the harms threshold (see Part Four - Section one)) are shared responsibly and with the right person, recorded and dealt with appropriately, is critical.

This should enable schools and colleges to identify concerning, problematic or inappropriate behaviour early, minimise the risk of abuse, and ensure that adults working in or on behalf of the school or college are clear about professional boundaries.

### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in *paragraph 355 KCSIE 2023*. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that isn't quite right. This may be that they are inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and does not meet the allegations threshold or is otherwise not considered by the LADO to be serious enough to consider a referral.

It is crucial that any such concerns, including those which do not meet the harm threshold (see Part Four - Section one KCSIE 2023), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from potential false allegations or misunderstandings.

Low level concerns should be shared as with any other concerns and recorded for future reference in order to identify any potential patterns of inappropriate behaviour. All records should be kept securely and confidentially and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

More detailed guidance and case studies on low-level concerns can be found in [Developing and implementing a low-level concerns policy \(farrer.co.uk\)](https://www.farrer.co.uk/resources/developing-and-implementing-a-low-level-concerns-policy).

### **Organisations or Individuals using school premises**

Where school or college receive an allegation relating to an incident that happened when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities), the school or college should follow safeguarding policies and procedures, including informing the LADO.

### **Whistleblowing**

The Federation fosters a culture of openness in line with the "Freedom to speak up" review and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children.

The Federation recognises that there may be circumstances where staff and pupils feel unable to raise concerns or incidents of malpractice within the Federation environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools/colleges are failing to safeguard and promote the welfare of children.

Where it is not possible to raise concerns within the school/college, staff and volunteers may report concerns to the following.

- Croydon's lead officers for child protection or safeguarding where there are issues regarding the welfare of a pupil.
- The following numbers can be used where there are issues regarding the Federation's overall procedures around safeguarding
  - Croydon Council's confidential whistle blowing email address – [schoolwhistleblowing@croydon.gov.uk](mailto:schoolwhistleblowing@croydon.gov.uk)
  - the Ofsted whistle-blowing line on **0300 123 3155**
  - the NSPCC whistleblowing advice line on **0800 028 0285** is open from 8 am – 8pm Monday –Friday or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

The Headteacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and pupils.

- The CSBC has an [escalation policy](#) which can be used by staff in school settings

### **Additional policies**

*Individual schools should record any additional procedures here or refer to any separate policies, which should cover the following areas:*

- *Relationships with pupils/positions of power and trust for the purposes of the Sexual Offences Act 2003*
- *expected guidance on professional and personal standards of conduct and behaviour*
- *confidentiality*
- *duty of care*
- *contact and communications with pupils and parents, including appropriate physical contact, home visits, email and other electronic communications*
- *behaviour management and use of restraint*
- *dealing with allegations*
- *first aid and administering medicines*
- *providing intimate or personal care*
- *photography and videos*

### **Providing Intimate or Personal Care to Pupils**

*Staff in primary schools may need to provide intimate or personal care to younger pupils, for example helping a child who has soiled themselves or supervising pupils who are changing for P.E.*

*Schools must have a written policy in place in order to promote safe working practices for staff and ensure children's privacy. Children should be encouraged to carry out self-care tasks for themselves where appropriate, but where adult intervention is needed, the following should be observed.*

- *Staff should follow any agreed school policy or practice when providing intimate or personal care.*
- *When taking pupils to the toilet, staff should make colleagues aware of the task to be undertaken and explain to the child what will happen.*
- *Parents should always be notified if intimate care has been provided.*
- *When providing intimate care, staff should carefully and sensitively observe the child's emotional response and report any concerns to the designated teacher.*
- *When children are changing, levels of supervision should be appropriate to the pupil's age.*
- *Staff should avoid any physical contact unless a child needs help.*
- *Staff should ensure that changing areas are private and that others are not able to enter whilst children are changing.*

### **Behaviour management, physical intervention and reasonable force**

The Federation will put in place a behaviour management policy, which has been agreed by the Governing Board, which follows government guidance, and any use of physical intervention and restraint will be linked to the implementation of this policy.



There are occasions where it may be appropriate for staff in schools and colleges to use reasonable force in order to safeguard students. The term 'reasonable force' is used to define an action where staff will need to intervene in order to prevent injury or violence. Guidance for schools and colleges can be found [here](#). It is believed by the department that a 'no-contact' policy leaves staff at risk of being unable to fully safeguard pupils in extreme circumstances.

Physically handling children with SEND or medical needs requires further consideration as their additional needs make them more vulnerable. Individual behaviour plans are a way of planning ahead for such eventualities and allow parents to work with staff in constructing a plan that meets the individual needs of the pupil and provides a plan for all staff to be familiar with.

Schools and colleges should keep a record such as bound book (log) of incidents of Reasonable Force.

*Guidance from the Department of Education provides schools with the powers to intervene in a variety of ways in order to manage behaviour within and outside the school. Details of these may be found at: [Behaviour and discipline in schools - Publications - GOV.UK](#)*

*HM Government guidance [Reducing the need for restraint and restrictive intervention](#) provides information on how to support children and young people with learning disabilities, autistic spectrum conditions and mental health difficulties who are at risk of restrictive intervention in special education settings. This guidance may also be helpful for schools and colleges.*

### **Music tuition**

*It is recognised that music tutors are vulnerable to allegations being made against them because they often work with children alone and the activity can involve some physical contact with a child.*

*Music tutors need to be aware of the possibility of their conduct and behaviour, including physical contact, being misinterpreted by a child or taken out of context by other adults and:*

- *ensure they behave in an appropriate manner and maintain professional boundaries at all times*
- *only use physical contact as necessary within the context of the activity, for example as a means of demonstrating technique, and only for as long as needed*
- *make sure any physical contact cannot be misinterpreted by a child by explaining in advance what contact will be involved and why*
- *ask the child's permission first and respect their wishes*
- *report any incidents or issues that arise to the appropriate member of staff and make sure a record is taken*
- *never travel alone with children in a car*
- *seek permission from parents before contacting children by mobile phone, for instance to rearrange a lesson or rehearsal, and use home telephone contacts wherever practicable.*

*The Federation should:*

- *carry out a risk assessment around providing music tuition. This should include:*
- *providing rooms/spaces that are adequately safe and open locations where the teacher can be easily observed by others, for example a door with glass in it*
- *passing on any relevant information about children that may have a bearing on how they could react to physical contact so the tutor can adapt their practice accordingly*
- *let parents know when they arrange tuition what level of physical contact may take place as part of the activity*
- *record any reported incidents or issues and deal with these within the framework of the school's own policies*
- *make sure music tutors are aware of the school's safeguarding and staff conduct policies prior to starting.*

## **PART 5 Health and safety and risk assessments**

### **Responsibility for health and safety**

The Governing Board and Headteacher will ensure that there is a robust health and safety policy in place in order to meet the statutory responsibility for the safety of pupils and staff within the school environment. Any health and safety policy adapted by the Federation will be based on the government guidance (link below) and will seek to balance risk avoidance against providing pupils with opportunities to take part in activities that help them learn to manage risk themselves.

[Health and safety: Advice on legal duties and powers](#)

Day-to-day responsibility for health and safety issues in the Federation will be delegated to a member of staff who is competent to carry out these duties and who has received the appropriate training. There should also be a named governor responsible for health and safety. These is:

**Name:**

**Designation:**

**Contact details:**

**Name:**

**Designation: Governor with responsibility for health & safety**

**Contact details:**

### **Risk assessments**

The Federation will seek to identify and manage risk through the use of risk assessments. These will be carried out:

- on an annual basis for the school environment as a whole.
- for all school trips.
- for pupils travelling between locations during the school day.
- for all work-based learning or work experience placements.
- when a pupil who has been excluded for risky or violent behaviour is returning to the school.
- whenever there are any changes to the school environment or school practices.
- following any serious incident including serious youth violence, harmful sexual behaviour and/or harassment.

Consideration should also be given to conducting risk assessments before PTA and other parent led events (e.g. fireworks or fairs) where people outside the school may have unregulated access or the usual measures for health and safety may not be sufficient.

### **Working with aggressive and violent parents**

Where schools are working with families who are known to children or adult social care and there are concerns about the behaviour of parents towards members of school staff, this must be discussed with the head teacher/ principal and the designated safeguarding lead and the information shared with children's social care.

If there are high levels of risk involved in contact with parents, children's social care may convene a risk assessment meeting with the network in order to discuss strategies to reduce risk, and it is vital that schools and colleges are part of this process.

### **Site security and visitors**

- The Governing Board is responsible for the security of the school premises and will take steps to ensure it is a safe environment and securely protected against trespass and/or criminal damage.
- The Headteacher will ensure that contractors have received the appropriate level of DBS checks before being allowed access to the building, depending on the level of access they are likely to have to pupils.
- Where the visitor is employed by an organisation where DBS checks are normally required, for example NHS staff, the Headteacher will request written confirmation that relevant checks have been carried out for that individual.

- All visitors and contractors will be:
  - informed to report to reception on arrival.
  - expected to provide proof of identity
  - expected to wear a name-badge or carry some form of identification at all times when on the Federation premises.
  - suitably supervised by Federation staff at all times.
  - made aware of Federation health and safety procedures.
- The Headteacher will ensure that any contract entered into with contractors' sets out clearly the expectations for worker's behaviour and the responsibility of contractors to monitor and ensure compliance with Federation policies.
- Contracted workers will not be allowed to approach or speak to pupils in any circumstances and must ensure that all equipment and working practices are in line with health and safety standards.
- Visiting organisations such as theatre groups who will be performing for or working directly with pupils will be expected to have adequate child protection procedures in place and must agree with class teachers in advance what level of supervision or contact, they will have regarding pupils.

### **Use of the school premises by other organisations**

The Federation will only allow use of the school premises by other organisations or schools outside of school hours for the purposes of providing supplemental schooling if:

- the school's incorporating document allows this.
- the organisation provides an overview of what it intends to teach so that the Head teacher, in line with the school letting policy, is able to make a judgement on whether this is in line with the promotion of British values.
- the organisation can provide evidence that they have followed safer recruitment practices and that their staff have the requisite DBS checks.
- reasonable due diligence checks are taken out on the organisation by the school.

### **Monitoring and review**

To enable the Federation to monitor the safety of the premises and the school environment, as well as the implementation of policies, the Headteacher and the governing board will ensure that.

- all Federation policies are regularly monitored by the designated safeguarding lead and annually reviewed by the head teacher and agreed by the governing board.
- the Federation keeps a central record of all accidents and incidents including what action was taken and by whom.
- staff are aware of their responsibility to record accidents and incidents.
- the Headteacher has an overview all accidents/incidents.
- serious accidents and incidents are reported to the Governing Board.
- the designated safeguarding lead ensures a high standard of recording of all concerns held about children.
- all accidents and incidents are scrutinised on a regular basis by the board of governors to identify any problems or weaknesses around Federation safeguarding policies and procedures or any emerging patterns, and agreeing to any course of action.

### **Additional policies**

*Individual schools should record any additional policies and procedures here*

*Online Safety Policy  
Anti-bullying policy  
Staff Handbook  
Behaviour Policy*

Annex 1:

## **Role of the designated safeguarding lead**

The role of the designated safeguarding lead and their deputy is to take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place) within the Federation and to be available during school hours for staff to discuss safeguarding concerns. This role should be explicit within their job description. They **MUST** be a **senior member** of staff from within the **leadership team**

The designated safeguarding lead (and their deputy) will:

- liaise with and manage referrals to relevant agencies such as Children’s Social Care, the LADO, the Channel Panel, the Police and the Disclosure and Barring Service (DBS).
- keep the Headteacher informed of on-going safeguarding and child protection issues and enquiries, especially section 47 enquiries.
- provide advice and guidance for staff on safeguarding and child protection issues and manage referrals. This includes where a crime may have been committed to the Police as required. [NPCC - When to call the police](#) should help understand when to consider calling the police and what to expect when working with the police.
- ensure the school’s safeguarding and child protection policies are up to date and consistent with Croydon’s Safeguarding Children Board policies and that policies are reviewed annually.
- ensure all staff, including temporary staff, are aware of and understand policies and procedures and are able to implement them. These include KCSIE Part 1, the school’s Code of Conduct, the School Safeguarding Policy including the Annex to this policy for their school and the Behaviour Policy. They will be a point of contact for advice and support for staff as well as safeguarding partners.
- attend regular training, including Prevent awareness training, and the designated teachers’ meetings hosted by Croydon and the Safeguarding Children Board in order to keep up to date with new policy, emerging issues and local early help, safeguarding and child protection procedures and working practices.
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues
- provide regular updates to all staff members and governors on any changes in safeguarding or child protection legislation.
- Liaise with the mental health lead, where safeguarding concerns link to mental health.

- have an awareness of those children who may be in need, young carers and children who have special educational needs and liaise with the SENCO when considering any safeguarding action for a child with special needs.
- liaise with the designated teacher for CLA whenever there are safeguarding concerns relating to a looked after child or previously looked after child.
- oversee child protection systems within the school/college, including the management of records, standards of recording concerns and referral processes.
- provide a link between the Federation and other agencies, particularly children's social care and the Croydon Safeguarding Children Partnership.
- ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 2 years.
- ensure parents are fully aware of the Federation policies and procedures and that they are kept informed and involved.
- all records are kept up to date and stored securely. It is good practise to keep a separate child protection file
- ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support the child on transfer. Schools will gain a receipt when passing files to a new provision. This should be within 5 days of transfer.

FULL Details of the role of the designated safeguarding lead and deputy can be found in annex C of KCSIE 2023. It is important that the DSL and DDSL are fully aware of their role and have capacity to carry out all areas of this.

## Annex 2

### Early Years Settings Within Schools

This section relates only to primary schools with nurseries and/or reception classes

#### Legal and policy framework

As an early years provider, delivering the Early Years Foundation Stage (EYFS), the school aims to meet the specific safeguarding and child protection duties set out in the Childcare Act 2006 and related statutory guidance.

[Statutory framework for the early years foundation stage](#)

The school will ensure that children taught in nursery and reception classes are able to learn and develop and are kept safe and healthy so that they are ready for school by providing a safe, secure learning environment that safeguards and promotes their welfare, and takes appropriate action where there are child protection concerns.

#### Safeguarding and child protection

All safeguarding and child protection policies listed in sections 3 and 4 of this policy will apply equally to children in early years settings so far as they are relevant to that age group.

In addition, the school has the following child protection policies:

A policy on the use of mobile phones and cameras within the early years setting. recommended policies are:

- parents and carers are asked to switch off mobile phones if they are coming into the early years setting and leave the setting if they need to use their mobile.
- parents are generally prohibited from taking any photographs of children in the early years setting, but for special events such as school performances, may do so on the understanding that the images are not posted onto social media sites or otherwise shared.
- staff seek parental permission to take photographs of the children, which must be linked to teaching the curriculum and that they use school equipment only for this purpose.
- staff do not bring personal mobile phones into the early years setting and use them only during breaks in the staff room.
- the staff will adhere to the E-Safety Policy at all times.
- photographs and videos of pupils will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy. Where photographs and videos will involve LAC pupils, adopted pupils or pupils for whom there are security concerns, a member of the Senior Leadership Team will liaise with the Designated Safeguarding Lead to determine the steps involved. The DSL will, in known cases of a pupil who is a LAC or who has been adopted, liaise with the pupil's social worker, carers or adoptive parents to assess the needs and risks associated with a pupil.
- staff will report any concerns about another staff member's use of mobile phones to the Designated Safeguarding Lead. and

- a statement on how notifications will be made to Ofsted in the event of an allegation of serious harm or abuse by any person working in the early years setting.

### **Suitable people and Safer Recruitment**

The school will follow the safer recruitment policy set out in section 6 of this policy to ensure that staff and volunteers who are recruited to work in the early years setting are carefully selected and vetted to ensure they are suitable to work with children and have the relevant qualifications.

Staff policies set out in section 6 of this policy will apply equally to staff and volunteers in the early years settings, and the school will ensure that they receive appropriate training and induction so that they are aware of their role and responsibilities, all school policies and the school's expectations regarding conduct and safe teaching practice.

Whenever an allegation is made against a member of staff in the early years setting, the school will follow the Croydon policy, '[The Management of Allegations against staff who work with Children and Young People](#)' as referred to in section 6 of this document.

Where early years staff are taking medication that may affect their ability to care for young children, this will be notified to the head teacher.

Childcare Disqualification – Appropriate checks should be made if there are concerns about a member of the team or the provision's management to make sure they are not disqualified from working in childcare. All information can be found in the [statutory guidance](#).

### **Staff training, skills and supervision**

- all staff in early years settings have the relevant qualifications and skills for their role and receive the relevant induction, child protection and safeguarding training in line with this policy.
- all policies set out in section 7 of this policy will apply equally to early years staff.
- all early years staff receive supervision that helps them to effectively safeguard children by providing opportunities to discuss issues and concerns and decide on what action to take.
- all early years staff are able to communicate effectively in English both orally and in writing.
- a member of staff who holds a current paediatric first aid certificate is available on the school premises at all times and accompanies children on school trips.
- each child in the early years setting has a designated keyworker who liaises with parents to provide individual support for the child.
- a record is kept of staff training – type of training and dates which is recorded on the single central register (SCR)

### **Staff ratios**

The school will ensure that:

- staff levels within the early years setting comply with statutory guidance and can meet the needs of the children, provide suitable levels of supervision and keep them safe.

- parents are kept informed of staff members and numbers.
- children are kept within staff sight and hearing at all times.

For nursery classes:

- there will be at least one member of staff for every 13 children
- one member of staff will be a qualified teacher
- at least one member of staff will hold a full and relevant level 3 qualification.

For reception classes:

- class sizes will be limited to 30 pupils
- classes will be led by a qualified teacher supported by suitably qualified support staff.

For before and after school provision, schools will decide how many staff will be required for adequate supervision based on the age and needs of the children attending.

## **Health**

The school will:

- promote the health of children attending the early years provision
- take necessary steps to stop the spread of infection
- administer medicines only in line with the school's policy
- take appropriate action where children are ill
- ensure any meals provided are nutritious and prepared in a hygienic manner
- notify Ofsted of any serious accident, illness or death of any child whilst attending the early years setting within 14 days.

## **Health and safety and suitability of premises**

The school will ensure that all indoor and outdoor spaces and facilities used for early years settings are safe and fit for purpose and comply with school policies and standards for site safety and health and safety as set out section 8 of this policy. Additionally, the school will ensure that all potential hazards within the school and during school trips are regularly risk assessed.

The school has specific policies for ensuring that records of parents details, and contact numbers for emergencies are kept up to date and that children are released to the care of their parent or other responsible adult with the parent's consent at the end of the day as well as policies for dealing with uncollected children.

## **Managing behaviour**

The school will take all reasonable steps to ensure that behaviour management techniques are appropriate to the child's age and that corporal punishment is not used or threatened.

[Behaviour and discipline in schools](#)



## CHILD PROTECTION. DEFINITIONS AND INDICATORS

### Definitions

Child protection is part of the safeguarding agenda that focuses on preventing maltreatment and protecting children at risk of neglect or abuse as well as witnessing the ill-treatment of others. Under the Children Act 1989, CSSW have a legal duty to investigate and take any action to protect children where there are concerns that they are at risk of suffering **significant harm**, which is defined as:

**Neglect:** failure to provide basic care to meet the child's physical needs, such as not providing adequate food, clothing or shelter. failure to protect the child from harm or ensure access to medical care and treatment.

**Physical abuse:** causing physical harm or injury to a child.

**Sexual abuse:** involving children in sexual activity, or forcing them to witness sexual activity, which includes involving children in looking at or the production of pornography.

**Emotional abuse:** failure to provide love and warmth that affects the child's emotional development. psychological ill treatment of a child through bullying, intimidation or threats.

### Possible indicators of abuse and neglect

<b>Neglect</b>	<ul style="list-style-type: none"> <li>• Inadequate or inappropriate clothing</li> <li>• Appears underweight and unwell and seems constantly hungry</li> <li>• Failure to thrive physically and appears tired and listless</li> <li>• Dirty or unhygienic appearance</li> <li>• Frequent unexplained absences from school</li> <li>• Lack of parental supervision</li> </ul>
<b>Physical abuse</b>	<ul style="list-style-type: none"> <li>• Any injury such as bruising, bite marks, burns or fractures where the explanation given is inconsistent with the injury</li> <li>• Injuries in unexpected places or that are not typical of normal childhood injuries or accidents</li> <li>• High frequency of injuries</li> <li>• Parents seem unconcerned or fail to seek adequate medical treatment</li> </ul>
<b>Sexual abuse</b>	<ul style="list-style-type: none"> <li>• Sexual knowledge or behaviour that is unusually explicit or inappropriate for the child's age/stage of development</li> <li>• Sexual risk taking behaviour including involvement in sexual exploitation/older boyfriend</li> <li>• Continual, inappropriate or excessive masturbation</li> <li>• Physical symptoms such as injuries to genital or anal area or bruising, sexually transmitted infections, pregnancy</li> <li>• Unwillingness to undress for sports</li> </ul>
<b>Emotional abuse</b>	<ul style="list-style-type: none"> <li>• Developmental delay</li> <li>• Attachment difficulties with parents and others</li> <li>• Withdrawal and low self-esteem</li> </ul>
<b>Indirect indicators of abuse and neglect</b>	<ul style="list-style-type: none"> <li>• Sudden changes in behaviour</li> <li>• Withdrawal and low self-esteem</li> <li>• Eating disorders</li> <li>• Aggressive behaviour towards others</li> <li>• Sudden unexplained absences from school</li> <li>• Drug/alcohol misuse</li> <li>• Running away/going missing</li> <li>• Absence from school</li> </ul>
<b>Parental attributes</b>	<ul style="list-style-type: none"> <li>• Misusing drugs and/or alcohol</li> <li>• Physical/mental health or learning difficulties</li> <li>• Domestic violence</li> <li>• Avoiding contact with school and other professionals</li> </ul>

**Safeguarding children monitoring/incident form- for visitors.**

**Name of school:**

**Name of child:**

**DOB:**

**Status:**       Monitoring due to concerns       Subject to child protection plan  
                     Subject to child in need plan       Child looked after

**Concerns/risks (observations, comments or disclosure)**

**Views of child and parents**

**Next Steps**

- |                                                                  |                                                             |
|------------------------------------------------------------------|-------------------------------------------------------------|
| <input type="checkbox"/> continue monitoring                     | <input type="checkbox"/> carry out Early Help Assessment    |
| <input type="checkbox"/> referral to MASH/MASH                   | <input type="checkbox"/> referral to health services        |
| <input type="checkbox"/> referral for education support services | <input type="checkbox"/> referral on behalf of parent/carer |

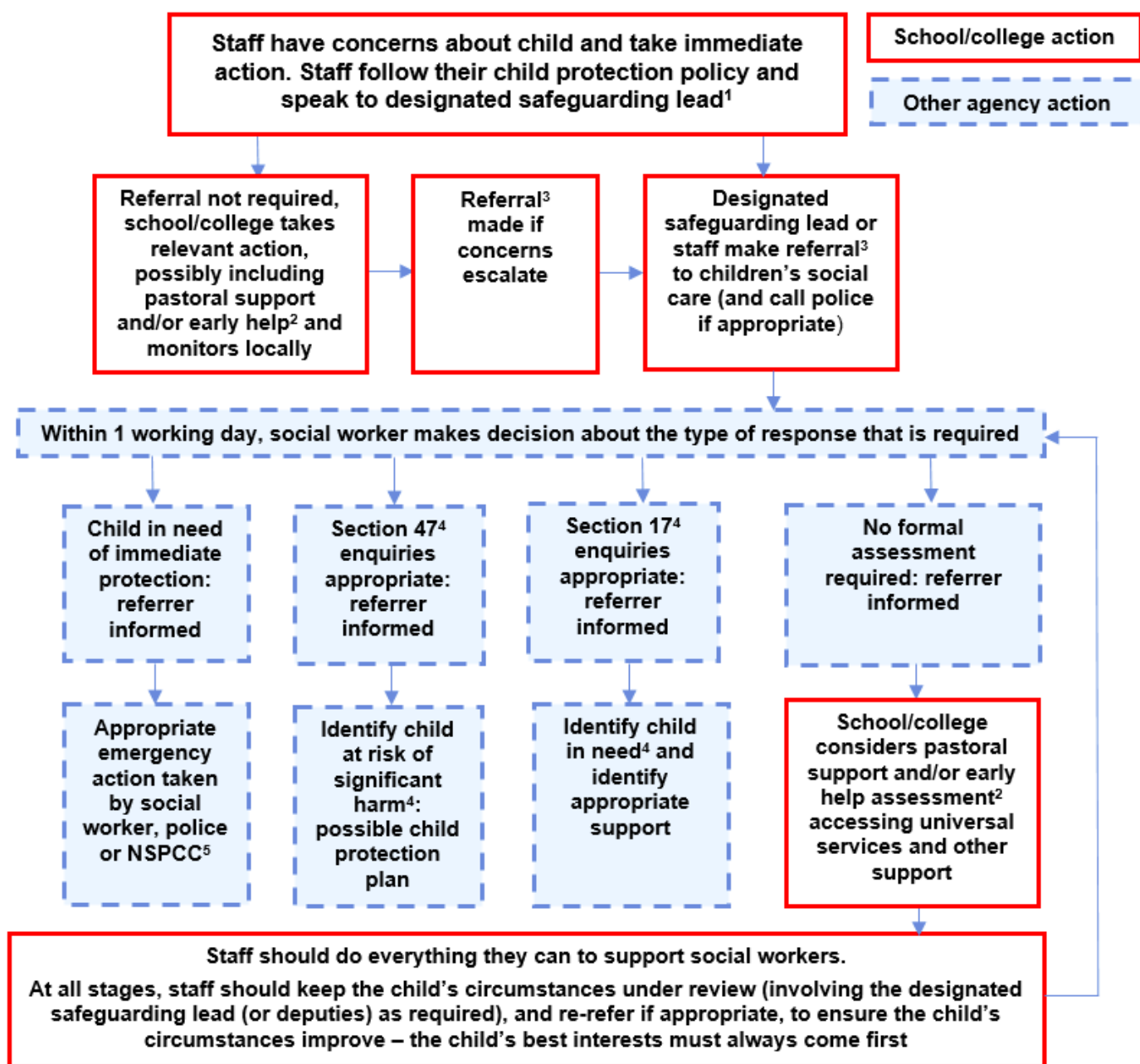
**Action taken and Outcomes (include dates when action taken and outcomes confirmed)**

Printed Name of staff member:

Signed:

Date:

## Actions where there are concerns about a child (P22 KCSIE Sept 2023)



<sup>1</sup> In cases which also involve a concern or an allegation of abuse against a staff member, see Part four of this guidance.

<sup>2</sup> Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

<sup>3</sup> Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

<sup>4</sup> Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

<sup>5</sup> This could include applying for an Emergency Protection Order (EPO).

## Annex 6: School Single Central Record/Register (SCR)

### Please note:

- Checks carried out on volunteers, maintained school governors and local governors in an academy trust do not need to be recorded on the SCR under the latest version of Keeping Children Safe in Education (KCSIE), **but it is recommend including them**
- KCSIE does not say specifically that contractors must be on the SCR, but it does say all staff who work at the school must be included, including supply staff, so it's best to include contractors too
- Where academies are mentioned, this includes free schools

### Important notes

This record should indicate what checks have been taken out for the following:

- For schools, all staff, including supply staff and teacher trainees on salaried routes, who work in school and others who work in regular contact children in school, including volunteers and governors
- For independent schools, including academies and free schools as above plus all members of the proprietorial body and involved in the management of the school
- For colleges, all staff providing education and/or whose positions involve a relevant activity

### Agency staff

Please give details of confirmation of checks that have been carried out by the supplying agency.

### Volunteers

- Unsupervised volunteers should not be left alone or allowed to work in regulated activity.
- For new volunteers in regulated activity who regularly teach children unsupervised an enhanced DBS is needed with a barred list check.
- For new volunteers not in regulated activity, schools should obtain an enhanced DBS certificate.
- Existing volunteers who provide personal care, the school should consider obtaining an enhanced DBS.
- Existing volunteers who are unsupervised do not need to have a DBS check with a barred list check because the volunteer should have been checked originally.
- For existing volunteers not in regulated activity there is no requirement for an enhanced DBS check (a school can request one but may not request a check of the barred list).
- For a volunteer not engaging in regulated activity a risk assessment should be made and a professional judgement made about the need for an enhanced DBS check.
- Supervision of volunteers – there must be supervision by a person in regulated activity, where supervision occurs, this must be regular and day to day and the supervision must be reasonable in all the circumstances to ensure the protection of children.

### Regulated activity

Regulated activity (see p171 for definition) – the period condition is at any time on more than three days in any period of 30 days. 'Frequently' is doing something once a week or more. Work of the nature defined is considered regulated activity if done regularly. where this is the case an enhanced DBS check is needed with a barred list check.

### Contractors

Contractors or employees of contractors working at the school should have the appropriate level of DBS check if a check is required, eg if the contractor is carrying out teaching or providing a level of care or supervision of children regularly.

### Documents and certificates

Please give details of any documentary evidence obtained as part of each check. Please note that there is no requirement to list DBS numbers. Also, to comply with the Data Protection, DBS certificates should not be retained any longer than six months. Other documents to verify identity, right to work in the UK etc, should be kept in personnel files.

## Model Single Central Record/Register Document

Name	Date of service	Address	DOB	Evidence of identity: (Initials of person carrying out check and date of check)	Barred list check (date and initials of person carrying out check)	Enhanced DBS check (date and initials of person carrying out check)	Prohibition from teaching check (date and initials of person carrying out check)	Section 128 check (date and initials of person carrying out check)	Further checks on persons who have worked outside the UK (date and initials of person carrying out check)	Checks on professional qualifications/ Certificates obtained (date and initials of person carrying out check)	Checks on right to work in the UK/documents obtained (date and initials of person carrying out check)

**Key:**

*Use this to confirm full names when initials have been used*

It is recommended to have this document in Excel, separate tabs can be created and separate spreadsheets completed for the various roles within school:

Teaching staff, Support staff including office staff and site staff, Supply Staff, Volunteers, Governing board, contractors