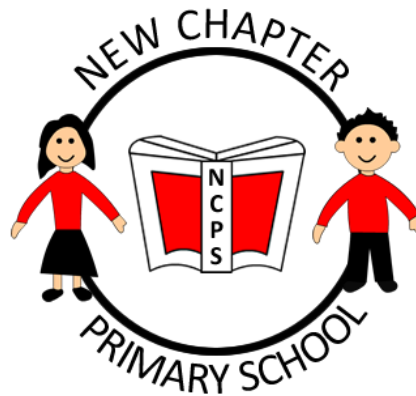


# **Milton Keynes Education Trust**

# **New Chapter**

# **Primary School**



# **Safeguarding and Child**

# **Protection Policy**

Revision	Status	Date	Author	Comments
1.0	Draft	01.09.20	JB	Updated in line with <b>Keeping Children Safe in Education 2020</b> and <b>MKET Child Protection Policy</b>
	Approved	14.10.20		Approved by LTSW
2.0	Draft	01.09.21	JB	Updated in line with <b>Keeping Children Safe in Education 2021</b>
	Approved	03.11.21	JB	Approved by LTSW
3.0	Draft	08.03.22	JB/AH	Updated legislation Added Children's roles section- how children are taught about Safeguarding Links to Remote learning policy added Non-recent concerns information added Links added to Record Retention Policy Updated section on allegations against staff- taken from Keeping Children Safe in Education 2021 Code of conduct read and understand added to staff responsibilities
	Final	16.03.22		Agreed by FGB
4.0	Draft	12.10.2022	AH	Replaced peer on peer abuse with child on child to reflect changes in KCSIE 2022
				Added definitions of 'victim' and 'alleged perpetrator(s)'
				Statement added about school's responsibility to play a crucial role in preventative education, and the policies and systems that underpin it
				Added line about: Reinforcing importance of online safety when communicating with parents providing a safe space for children who are LGBT to share their concerns staff will be aware children are at risk of harm inside and outside their home, at school and online
				Added responsibilities to the DSL: good understanding of harmful sexual behaviour, discuss local responses to sexual violence and harassment with police and social care, confident in knowing what support is available; aware children must have an appropriate adult for searches
				Headteacher to make decisions on low-level concerns and may liaise with the DSL.
				Section added on responsibilities of virtual school heads.
				Points added If a victim asks the school not to tell anyone about the sexual violence or sexual harassment
				Section added regarding confidentiality with regards to anonymity
				Points added that some children may not be ready to talk about abuse, recognise their experiences as harmful or feel embarrassed about speaking but this should not stop concerns from being referred to the DSL.

				Section added procedures for dealing with child on child abuse, including DSL working closely with the Police
				Points added that school will support children who have witnessed sexual violence and make sure all parties are not bullied or harassed
				Point added about how soon transfer of files should occur
				Contact will be made with LADO if there is any doubt as to whether it meets harm threshold
				Point added that when considering harmful sexual behaviour, age and development will be taken into consideration
	Final	02.11.22		Approved by FGB
	Draft	November 2022	JB	Updated key contacts
	Final	08.02.23		Governors noted the updates

## Contents

KEY CONTACTS.....	6
Safeguarding statement .....	7
1. General principles.....	7
2. Legislation and guidance .....	8
3. Definitions .....	8
4. Roles and responsibilities .....	9
The Designated Safeguarding Lead .....	9
Designated Safeguarding Lead responsibilities .....	9
All staff responsibilities .....	11
Headteacher’s responsibility .....	13
Governing Body responsibilities.....	14
Virtual school heads .....	15
Children’s role.....	15
5. Reporting and record keeping.....	15
6. Transfer of files.....	16
7. When to be concerned.....	17
Vulnerable students .....	17
Children who may require early help.....	18
Children with special educational needs and disabilities or physical health issues.....	19
8. Safer recruitment .....	19
Safe working practice .....	19
Training, Inductions and Information.....	19
9. Information sharing and confidentiality.....	20
10. The use of school premises by other organisations.....	21
11. Concerns about a staff member, supply teacher or volunteer .....	21
12. Specific safeguarding issues .....	24
Abuse and neglect.....	24
Indicators of abuse and neglect .....	25
Mental health .....	25
Child on child abuse.....	26
Sharing nudes and semi-nudes.....	28
Online safety.....	29
Sexual violence and sexual harassment between children.....	30

Children missing from education .....	31
Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE).....	31
Honour-based Abuse .....	32
FGM mandatory reporting duty .....	32
Forced marriage .....	33
Preventing radicalisation.....	34
Prevent .....	35
Channel.....	35
Domestic abuse .....	36
Homelessness .....	36
Remote Learning .....	37
13. Cross reference to other school policies .....	37
14. Policy review.....	37
15. Contacts and further information .....	37

## **KEY CONTACTS**

Contact should be made through the school on 01908 679809

**MKET Chief Executive Officer:**

Ms Michelle Currie

**Headteacher:**

Mr Billing

**Designated safeguarding lead:**

Mr Billing

**Deputy designated safeguarding leads:**

Mrs Hedges

Mrs Dunkley

Mrs Trigg

**Designated on-line safety lead:**

Mr J Williams-Morris

**Designated PREVENT lead:**

Mr Billing

**Designated CSE lead:**

Mr Billing

**Designated LAC leads:**

Mr Billing

**Chair of governing body**

Mr S Newbould

**Designated governor for safeguarding:**

Mr D Hopkins

**Designated governor for safer recruitment:**

Mr D Hopkins

## Safeguarding statement

Safeguarding is everybody's business. New Chapter Primary School is committed to ensuring that all our children and young people are safe and feel safe; that children, parents and carers, and staff are able to talk about any safeguarding concerns and feel assured that they will be listened to; and that all staff and volunteers are aware of and implement safeguarding procedures and guidance, including what to do if they suspect a child or young person may be experiencing, or at risk of, harm. We expect everyone who works in our school to share this commitment.

**This policy applies to all adults, including volunteers, working in or on behalf of New Chapter Primary School.**

### 1. General principles

Nothing is more important than children's welfare. Children (defined as anyone who has not yet reached their eighteenth birthday) who need help and protection deserve high quality and effective support as soon as a need is identified. (Working Together to Safeguard Children, 2018).

At New Chapter Primary School children are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum. Children are taught to recognise when they are at risk and how to get help when they need it.

Schools and all school staff are an important part of the wider safeguarding system for children. Safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes into contact with children and their families has a role to play. In order to fulfil this effectively, all professionals should make sure their approach is child centred. This means they should consider, at all times, what is in the best interests of the child.

New Chapter Primary School will ensure that there are appropriate systems in place for seeking and taking into account the child's wishes and feelings when making decisions, taking action and deciding what services to provide to protect individual children. Staff (and other adults working for or on behalf of the school) will receive appropriate child protection and safeguarding training to ensure they are aware of their roles in the early recognition of abuse or neglect and the appropriate procedures to follow. In addition, all staff will receive safeguarding and child protection updates (via email, bulletins and staff meetings) as required, but at least annually, to provide them with relevant skills and knowledge to safeguard children effectively. We will ensure that arrangements are in place to safeguard and promote the welfare of children and young people, regardless of any barriers they may face, by:

- Ensuring that the welfare of the child is paramount
- Ensuring that all children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- Establishing a safe environment in which children can learn and develop, where they feel secure and are encouraged to talk and are listened to
- Providing children and young people with opportunities to discuss issues and report problems affecting their safety and welfare
- Safeguarding their welfare, particularly those children and young people who are most disadvantaged and vulnerable (including children who have SEND who are 3 times more likely to be

abused than their peers or certain health conditions, EAL, are Young Carers, are known to be living in difficult situations, are at risk of FGM, exploitation or radicalisation, are risk due to their own or a family member's mental health needs)

- Including opportunities in the curriculum for children to develop the skills they need to recognise and stay safe from abuse
- Ensuring safe recruitment practices
- Ensuring robust procedures for recognition and referral where there are welfare or child protection concerns
- Raising awareness amongst staff of child protection issues and ensuring staff are equipped to deal with concerns and keep children safe
- Monitoring and supporting children and young people who are in care, previously in care, subject to child protection plans or have a social worker, and contributing to the implementation of their plan
- Promoting partnership working with parents and professionals

## 2. Legislation and guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2022\)](#), [The Prevent Duty \(2015\)](#), [The Children Act \(1989\)](#) and [Working Together to Safeguard Children \(2018\)](#). We comply with this guidance and the arrangements agreed and published by Milton Keynes Safeguarding Children Partnership (MKSCP), part of MK Together [MK Together policy and procedures](#)

All staff will, as a minimum, read part 1 and Annex A of Keeping Children Safe in Education (2022) which summarises the full document, and be able to demonstrate that they have understood the contents.

The following three safeguarding partners are identified in Keeping Children Safe in Education; they will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

## 3. Definitions

**Safeguarding:** Safeguarding and promoting the welfare of children is defined in Keeping Children Safe in Education as:

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

**Child Protection:** Child Protection is the aspect of safeguarding that focuses on the processes undertaken to protect children who have been identified as suffering, or being at risk of suffering significant harm.



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

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

## 4. Roles and responsibilities

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

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

- Behaviour policy
- Online safety policy
- PSHE policy
- Safe to Learn policy
- Pastoral support system

All adults working with or on behalf of children have a responsibility to protect them. There are, however, key people within schools and the Local Authority who have specific responsibilities under child protection procedures.

### The Designated Safeguarding Lead

The responsibilities of the Designated Safeguarding Lead are defined in a job description that is in line with Keeping Children Safe in Education (2022).

The Designated Safeguarding Lead has the status and authority within the school to carry out the duties of the post including committing resources and, where appropriate, supporting and directing other staff.

During term time, the Designated Safeguarding Lead and/or a Deputy Designated Safeguarding Lead will be available during school hours for staff and parents in the school to discuss any safeguarding concerns.

Details of contact names and arrangements for out of hours/out of term activities are provided to Children's Social Care.

### Designated Safeguarding Lead responsibilities

Full details of the Designated Safeguarding Lead's responsibilities can be found in Keeping Children Safe in Education (2022). In summary, responsibilities include:

- Ensuring that child protection procedures are followed within the school and to make appropriate, timely referrals to the Milton Keynes Multi-Agency Safeguarding Hub (MASH) in accordance with the Milton Keynes Safeguarding Children Partnership’s multi-agency safeguarding procedures
- Ensuring that all staff employed within the school, including temporary staff and volunteers, are aware of the school’s internal procedures in addition to the government guidance Keeping Children Safe in Education (2022); to advise other staff; and to offer support to those requiring this
- Undertaking specialist child protection training, updated at a minimum of every two years
- Linking with the Milton Keynes Safeguarding Children Partnership ([MK Together](#)) and ensure that all staff are aware of relevant training opportunities, as well as updates in local policies on safeguarding
- Ensuring a statement is published that informs parents and carers about the school’s duties and responsibilities under child protection procedures. The school must publish its child protection policy online on the school website and make copies available to parents on request
- Ensure that the schools code of conduct is given to all staff employed within the school, including temporary staff and volunteers as part of an induction process.
- Have a good understanding of harmful sexual behaviour
- Discuss the local response to sexual violence and sexual harassment with police and local authority children’s social care colleagues to prepare the school’s policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an ‘appropriate adult’ to support and help them in the case of a police investigation or search

In detail the Designated Safeguarding Lead is responsible for:

#### **Managing referrals and cases**

- Ensuring referrals of all cases of suspected abuse or neglect to the Milton Keynes Multi-Agency Safeguarding Hub (MASH), Police (cases where a crime may have been committed) and to the Channel programme where there is a radicalisation concern
- Referring cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required
- Keeping an up to date list of Children Looked After (CLA) and ensuring information is shared with appropriate staff

#### **Work with others**

- Act as a point of contact with the three safeguarding partners
- Liaison with the Headteacher to provide information on ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- Liaison with “case managers” and the LADO on cases which concern a staff member
- Liaison with staff (particularly pastoral support staff, school nurses, IT Technicians, and SENCOs) on matters of safety and safeguarding and whether to make a referral
- Act as a source of support, advice and expertise for all staff

## Training

The Designated Safeguarding Leads will undertake specialist safeguarding and child protection training which will be updated at least every two years. All new staff are required to attend a safeguarding induction session with the Designated Safeguarding Lead. All staff will receive regular safeguarding training throughout the academic year on current issues such as female genital mutilation (FGM), Prevent, Child Sexual or Criminal exploitation (CSE/CCE), online safety, signs and types of abuse, substance abuse, mental health – this list is not exhaustive. The DSL will use weekly updates from Andrew Hall Safeguarding and NSPCC to keep staff informed of current safeguarding issues, policy changes and resources to maintain a culture of vigilance around safeguarding and early help.

Staff on contracts to companies supplying contracted services, for example catering and cleaning staff, will receive basic safeguarding training from the DSL in the school to complement that supplied by their employer.

## Raising Awareness

The Designated Safeguarding Lead needs to:

- Ensure the school's child protection policies and procedures are known, understood and used appropriately
- Ensure the school's safeguarding and child protection policy is reviewed annually as a minimum and the procedures and implementation are updated and reviewed regularly, working with the school's governing board regarding this
- Ensure that the school's safeguarding and child protection policy is publicly available and that parents are aware that referrals concerning suspected abuse or neglect may be made and what role the school plays in this
- Link with Milton Keynes Safeguarding Children Partnership (MK Together) to make sure staff are aware of training opportunities and the latest local policies on safeguarding

## All staff responsibilities

- Induction training: all staff members, including the Headteacher (if they are not a designated lead) will receive a mandatory induction to familiarise themselves with:
  - Relevant policies and procedures, including the child protection policy, the behaviour policy and staff code of conduct
  - Keeping Children Safe in Education Part 1 and Annex A of [Keeping Children Safe in Education \(2022\)](#)
  - [What to Do If You Are Concerned About a Child: Advice for Practitioners \(DfE, 2015\)](#)
  - Information about the signs and indicators of abuse and neglect
  - Information regarding child sexual exploitation, child criminal exploitation, female genital mutilation and Prevent
  - Information on what to do if they have concerns about a child or young person.
  - The role of the Designated Safeguarding Lead and any deputies
  - The safeguarding response to children who go missing from education [Children Missing Education 2016](#)
- To read and understand Part 1 and Annex A of Keeping Children Safe in Education, 2022.

- To attend child protection training, including updates on safeguarding and child protection, as required, but at least annually
- To be aware of the mandatory duty, introduced by the Serious Crime Act 2015 that requires teachers to report known cases of Female Genital Mutilation involving children under 18 to the police
- To be aware of how to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding processes and what to do if concerns are not addressed
- To be aware of the early help process and understand their role in it
- To be aware of the referral process to Children's Social Care and the role they might be expected to play in assessments
- To know what to do if a child tells them that he/she is being abused or neglected
- The importance of discussing online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

If a student begins to confide any matter involving alleged abuse, or neglect, whether physical, emotional or sexual, to a member of staff, they should follow the following guidelines:

- Don't make any promises to the student
- Don't reveal your own feelings
- Stay calm and reassuring
- Explain that you cannot promise to keep what they tell you as a secret - you have a duty to inform the DSL
- Do not press for details or ask leading questions
- Ask if they have told anyone else
- Assure the student that they have done the right thing
- Write a detailed account, using the student's own words, dated, timed and signed
- Inform the DSL or DDSL
- Upload the detailed account to **MyConcern** as this may be needed as evidence in court

Bear in mind that some children may:

Not feel ready, or know how to tell someone that they are being abused, exploited or neglected

Not recognise their experiences as harmful

Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

It is important to listen to the student and not interrupt while he or she is freely recalling significant events and to make a note of all that is said, which is to be passed to the designated member of staff. Staff should also be aware that noted recordings of the discussion may need to be used in any subsequent court proceedings and may be made available to the student's parents/carers at the Child Protection conference.

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

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer harm, or in immediate danger. **Anyone can make a referral.**

Tell the DSL as soon as possible if you make a referral directly.

You can report child abuse to the Milton Keynes Multi-Agency Support Hub (MASH) by calling 01908 525169/70 or by using this link:

<https://www.milton-keynes.gov.uk/children-young-people-families/children-s-social-care/worried-about-a-child>

The welfare of the student is paramount; therefore all situations must be treated with sensitivity. Staff must maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the DSL or DDSL and Children's Social Care.

### **Headteacher's responsibility**

The Headteacher will ensure that:

- Staff are fully aware of New Chapter Primary School's safeguarding and child protection policies and that these policies are fully implemented
- The Designated Safeguarding Lead is given sufficient support, time and resources to carry out their responsibilities
- Staff are released to attend child protection conferences, professionals meetings, team around the family meetings, core group meetings and any other meetings held to discuss potential safeguarding issues concerning students at the school
- Safe recruitment practice is followed in all cases whenever recruiting to all paid or unpaid volunteer posts
- Appropriate DBS checks are completed, including section 128 provision checks for all staff involved in the management of the school which may be considered to include any teaching positions on the senior leadership team, any teaching positions that carry a department headship, any non-teaching staff who are part of the senior leadership team as well as Governors, Trustees, Directors and the Headteacher
- Referral is made to the disclosure and barring service where there are concerns that a person has caused harm or poses a future risk of harm to children and as a consequence has been dismissed or has resigned
- New Chapter Primary School offers a safe environment for staff and students to raise concerns about poor or unsafe practice
- Appropriate action is taken whenever an allegation is made against a member of staff
- In conjunction with the Designated Safeguarding Lead, complete an annual safeguarding audit, which will be submitted electronically to the MK Together Partnership within the notified timeframe

- Audit outcomes are shared with the Governing Board and will form the basis of the school's own Annual Report to Governors which details key actions to be taken as a result of the audit - actions to be included in the school's development planning
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this

## Governing Body responsibilities

Governing Boards must ensure that they comply with their duties under legislation. They must also have regard to this guidance to ensure that the policies, procedures and training in their schools are effective and comply with the law at all times.

Additional information to support Governing Boards in carrying out their duties can be found in Keeping Children Safe in Education (2022) – Part 2

In summary responsibilities placed on Governing Boards include:

- Appointing an appropriate senior member of staff to act as the Designated Safeguarding Lead.
- Ensuring, in conjunction with the Headteacher, that the Designated Safeguarding Lead fulfils the role and upholds the school's statutory responsibilities
- Supporting inter-agency working, which includes providing a coordinated offer of early help when additional needs of children are identified
- Ensuring that an effective child protection policy and procedures are in place and that the policy and structures supporting safeguarding children are reviewed annually as a minimum, together with a staff code of conduct
- Ensuring staff are provided with Part One of Keeping Children Safe in Education (2022) and are aware of specific safeguarding issues
- Ensuring that staff induction is in place with regards to child protection and safeguarding
- Ensuring that all of the Designated Safeguarding Leads (including deputies) should undergo formal child protection training every two years (in line with MK Together guidance) and receive regular (annual) safeguarding refreshers (for example via e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments)
- Prioritising the welfare of children and young people and creating a culture where staff are confident to challenge senior leaders over any safeguarding concerns
- Ensuring that children are taught about safeguarding in an age appropriate way
- Ensuring appropriate filters and monitoring systems are in place to safeguard children from potentially harmful and inappropriate online material
- Ensuring they complete regular safeguarding training
- Ensuring that there is a nominated governor for safeguarding children on the Governing Board

Governors will not be given details relating to individual child protection cases or situations, in order to ensure confidentiality is not breached.

## Virtual school heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

## Children's role

Children learn about safeguarding through:

- PSHE and SRE lessons
- RE lessons
- Ethos Assemblies
- Circle times and discussions
- Pastoral interventions

Children are encouraged to talk about any concerns they may have and share any concerns around peers or family members. Staff follow normal safeguarding procedures for any concerns raised during a lesson or circle time activity.

## 5. Reporting and record keeping

All safeguarding discussions, decisions made and the reasons for the decisions, must be recorded on the secure electronic platform, MyConcern. Confidential information and records will be stored on this platform or in locked filing cabinets and are only accessible to members of the safeguarding team.

When an individual concern, or incident is seen by, or brought to the attention of, a member of staff it is reported using MyConcern. This automatically raises a notification email to the DSL team in the school, who will action early help intervention/advice for the student and/or family. When considering appropriate actions, the views and wishes of the child are taken into account, but staff will be alert to the dangers of colluding with secrets and they must report safeguarding concerns.

All staff are trained to use and report concerns using MyConcern. Reports should be objective and based on evidence and should distinguish between fact, observation, allegation and opinion. The note should record the time, place and people present as well as what was said. Supporting evidence (letters, student's work, and student statements, meeting minutes, including those from Children's Social Care) can be uploaded to specific cases. All records need to be given to the Designated Safeguarding Lead promptly. No copies should be retained by the member of staff or volunteer.

The DSLs and the DDSLs have access to all information relating to students held on MyConcern.

If a referral is determined as the appropriate action, the DSL/DSL will either contact MASH (Multi-Agency Safeguarding Hub) for telephone advice from the duty desk team, or complete a MARF (Multi-Agency Referral Form) and/or the EHA (Early Help Assessment Form) and send it via secure electronic mail to MASH. MASH will determine the level of need and appropriate agency interventions.

**Multi-Agency Safeguarding Hub (MASH): 01908 253168 or 01908 253170**

**Emergency Social Work Team (out of hours): 01908 265545**

**Email: [children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)**

The DSL team must normally ensure contact is made with a parent/carer to obtain consent before a referral is made. However, if the concern involves alleged or suspected child sexual abuse, honour based violence, fabricated or induced illness or where the DSL has reason to believe that informing the parent at this stage might compromise the safety of the child or a staff member, nothing should be said to the parent/carer ahead of the referral. Rationale of this decision must be noted on the referral form.

The DSL team must be confident to challenge decisions made by MASH and other agencies if they feel that a child remains in need, or at risk.

Any child protection referral process should not delay any administration of first aid or emergency medical assistance. If a child is thought to be at immediate risk, perhaps because of parental violence, intoxication, substance abuse, mental illness or threats to remove the child from the school, urgent Police involvement will be requested.

A referral must be made to Children's Social Care and/or the Police in all suspected incidents where:

- Child sustains physical injury or is distressed as a result of reported chastisement
- Alleges that they have been chastised by the use of an implement or substance
- There is evidence to suggest that the child is suffering/has suffered through Child Sexual Exploitation, Female Genital Mutilation, Forced Marriage, Honour Based Abuse, Domestic Abuse or Child Abuse through faith or belief

If a staff member has any suspicion that any of these incidents listed may have occurred, they must report this immediately to the DSLs.

Whilst students are participating in trips and visits, including residential trips, New Chapter Primary School's Safeguarding and Child Protection Policy will apply. Direct contact details of the DSL or a senior member of staff will be available for direct reporting or advice whilst on the trip.

## **6. Transfer of files**

When students transfer to another school or educational setting, any records relating to child protection or welfare issues should be sent to the receiving establishment within 5 days for an in-year transfer, or within the first 5 days of the start of a new term. This file should be transferred separately from the main student file. Files will be transferred electronically between schools using MyConcern where possible.

When students are dual registered (e.g. on roll at a mainstream school but receiving education in another establishment), any existing safeguarding or child protection concerns will be shared with the new establishment to ensure appropriate risk assessment and support.



Child protection record must be transferred at each stage of a child's education, up until 18 and, in some cases, beyond this. The responsibility for transfer of records lies with the originating setting as the receiving school might not be aware that child protection concerns exist.

When a student joins the school in-year, a letter is sent to the previous school for confirmation of any child protection and safeguarding records or concerns. A receipt is retained and dated.

Retention of child protection files is detailed in the Records Retention policy.

## 7. When to be concerned

At New Chapter Primary School we operate a child-centred and coordinated approach to safeguarding. This means that child protection, safeguarding and promoting the welfare of children is everyone's responsibility. In order to fulfil this responsibility effectively, all staff will ensure their approach is child centred. This means that they should consider, at all times, what is in the best interests of the child.

Schools and their staff form part of the wider safeguarding system for children. This system is based on the principle of providing help for families to stay together where it is safe for the children to do so, and looking at alternatives where it is not, whilst acting in the best interests of the child at all times.

If a student discloses that they have witnessed domestic abuse, or it is suspected that there may be incidents of domestic abuse within the family, this should be reported to the DSL or DDSL as a safeguarding concern.

### Vulnerable students

Any incidents concerning a student who is a **Looked After Child** or subject to a **Child in Need or Child Protection Plan** must be reported immediately to the DSL who will raise this with the social worker.

At New Chapter Primary School, we recognise that when a child has a social worker, it is an indicator that the child is more at risk than other students. This may mean they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health. We take these needs into account when making plans to support students who have a social worker. We work closely with social workers and family support teams to ensure students receive support to promote their welfare.

### Private Fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or may be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements. On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

### Children who may require early help

**Early help** means providing support as soon as a problem arises to assist families and young people before their needs become acute and social care or other specialist intervention may be necessary. All staff need to be aware of, and understand, their role in identifying emerging problems and sharing information with other professionals to support early identification and assessment of a child's needs. It is important for children to receive the right help, at the right time, to address risks and prevent issues escalating. This also includes staff being active in monitoring and feeding back ongoing or escalating concerns to the DSL, to ensure due consideration can be given to a referral if the child's situation does not appear to be improving. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead professional.

All adults working at New Chapter Primary School need to be alert to the potential need for early help for a child who:

- Is disabled and has specific additional needs
- Has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- Is a young carer
- Is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- Is frequently missing/goes missing from care or from home
- Is at risk of modern slavery, trafficking or exploitation
- Is at risk of being radicalised or exploited
- Has a family member in prison, or is affected by parental offending
- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse
- Is misusing drugs or alcohol themselves
- Has returned home to their family from care
- Is at risk of 'honour'-based abuse such as Female genital mutilation or Forced Marriage
- Is a privately fostered child
- Is persistently absent from education, including persistent absences for part of the school day

All staff need to be aware of the main categories of maltreatment: physical abuse, emotional abuse, sexual abuse and neglect. They must also be aware of the indicators of maltreatment and specific child protection and safeguarding issues so that they are able to identify cases of children who may be in need of help or protection.

## Children with special educational needs and disabilities or physical health issues

Additional barriers can exist when recognising abuse and neglect in this group of children which can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's impairment without further exploration
- These children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- The potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these concerns

Staff need to be mindful of this and ensure support is in place to address any issues or difficulties this group of children may experience.

## 8. Safer recruitment

The governing body and school leadership team are responsible for ensuring that the school follows safe recruitment processes in accordance with government requirements and MK Together procedures, including:

- Ensuring the Headteacher, other staff responsible for recruitment and one member of the governing body completes safer recruitment training
- Ensuring the upkeep of a Single Central Record of all staff and regular volunteers
- Ensuring written recruitment and selection policies and procedures are in place
- Adhering to statutory responsibilities to check staff who work with children
- Taking proportionate decisions on whether to ask for any checks beyond what is required
- Ensuring that volunteers are appropriately supervised
- Ensuring that at least one person on any appointment panel is safer recruitment trained

New Chapter Primary School is compliant with guidance contained in Keeping Children Safe in Education (2022) part 3 and in local procedures for managing safer recruitment processes, which are set out in Milton Keynes Safeguarding Children Partnership (MKSCP)

## Safe working practice

New Chapter Primary School has developed a clear Code of Conduct that staff understand and have agreed to. The Code of Conduct offers guidance to staff on the way they should behave when working with children.

## Training, Inductions and Information

All staff receive an outline of child protection procedures in September each year. Newly qualified teachers and all new staff receive an induction about safeguarding and child protection. This includes New Chapter Primary School's procedures in dealing with concerns and the staff Code of Conduct. All staff are required to read and understand Part One and Annex A of Keeping Children Safe in Education 2022

## 9. Information sharing and confidentiality

Safeguarding children raises issues of confidentiality that must be understood by staff and volunteers.

The school recognises that all matters relating to child protection and safeguarding are confidential; generally, information 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 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 over are able to give their own consent.

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- National guidance can be found in [Information sharing: advice for practitioners providing safeguarding services 2018](#)
- If staff are in any doubt about sharing information, they should speak to the DSL or deputy

If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:

- There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
- The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
- Parents or carers should normally be informed (unless this would put the victim at greater risk)
- The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
- Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains

Regarding anonymity, all staff will:

- Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved

- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

Where a child is at risk of suffering significant harm, schools and settings 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 must share any information about the child requested by CSC.

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.

Parental consent to referral need not be sought if seeking consent is likely to cause further harm to the child or the child is a flight risk. Before taking this step, the school will consider the proportionality of disclosure against non-disclosure: is the duty of confidentiality overridden by the need to safeguard the child. The school will seek advice on this matter from the MASH team. Safeguarding ALWAYS overrides confidentiality: the welfare of the child is paramount.

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 school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated member of staff or seek advice from the MASH.

The DSL and safeguarding team, will maintain a list of key contacts within the Local Authority including the MASH and LADO; and the police may be able to advise on who to contact.

## **10. The use of school premises by other organisations**

Where services or activities are provided separately by another body using the school premises, the Governors will seek assurance that the organisation concerned has appropriate policies and procedures in place in regard to safeguarding children and child protection.

## **11. Concerns about a staff member, supply teacher or volunteer**

At New Chapter Primary School we recognise the possibility that adults working in the school may harm children, including governors, volunteers, supply teachers and agency staff and takes any allegations seriously.

Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay. Where there are concerns/allegations about the Headteacher, this should be referred to the Chair of Governors.

Concerns may come from various sources, for example, a 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 having been undertaken.

The Headteacher has to decide whether the concern is an allegation or 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 for referral to the Local Authority Designated Officer (LADO) (see below).

### **Allegations**

It is an allegation if the person (staff, supply teachers, volunteers and contractors) has:

- Behaved in a way that has harmed a child, or may have harmed a child and/or;
- Possibly committed a criminal offence against or related to a child and/or;
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children;
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes behaviour that happened outside of school.

Allegations should be reported to the LADO 'without delay'. Before contacting the LADO, the school should conduct basic enquiries in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. The LADO's role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children's social care, the school, or a combination of these.

### **Low-level Concerns**

Concerns may be graded Low-level if the concern does not meet the criteria for an allegation; and the person has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work. Example behaviours include, but are not limited to:

- Being over friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language

If the concern has been raised via a third party, the Headteacher should collect evidence as possible by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Staff should be encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection

they believe they have behaved in such a way that they consider falls below the expected professional standards.

Low-level concerns should be recorded in writing, including:

- Name\* of individual sharing their concerns
- Details of the concern
- Context in which the concern arose
- Action taken

(\* if the individual wishes to remain anonymous then that should be respected as far as reasonably possible)

If we're in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

Records must be kept confidential, held securely and comply with the Data Protection Act 2018. Schools should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

### **Non-recent allegations**

Abuse can be reported, no matter how long ago it happened. We have a commitment to taken concerns seriously and co-operate with other agencies.

We will report any non-recent allegations made by a child to the LADO, DBS, the police and the TRA in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Details of allegations following an investigation that are found to have been malicious or false should be removed from personnel records, unless the individual gives their consent for retention of the information. However, for all other allegations, it is important that the following information is kept on the file of the person accused:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- a note of any action taken, and decisions reached and the outcome as categorised above;
- a copy provided to the person concerned, where agreed by children's social care or the police; and,
- a declaration on whether the information will be referred to in any future reference.

Retention of files relating to allegations against staff is detailed in the Records Retention policy.

There is a legal requirement for employers to make a referral to the DBS where they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child (see Keeping Children Safe in Education part four for further information).

**Milton Keynes LADO**

**Tel: 01908 254307**

**Email: [lado@milton-keynes.gov.uk](mailto:lado@milton-keynes.gov.uk)**

## 12. Specific safeguarding issues

All staff should be aware of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger. Specific safeguarding issues include:

- Abuse and neglect
- Mental health
- Child on child abuse
- Sexting
- Sexual violence and sexual harassment between children in schools
- Children Missing from Education
- Child Sexual Exploitation and Child Criminal Exploitation
- Honour-based Abuse, including Female Genital Mutilation and Forced Marriage
- Preventing radicalisation
- Homelessness

Safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children not connected with the school. Assessments of children should consider whether wider environmental factors are present in the child's life that are a threat to their safety and/or welfare. This is known as contextual safeguarding and these factors need to be assessed to ensure effective intervention.

### Abuse and neglect

Knowing what to look for is vital to the early identification of abuse and neglect. All staff should be aware of indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. If staff are unsure, they should always speak to the DSL (or deputy).

All staff should be aware that abuse, neglect and safeguarding issues are rarely stand-alone events that can be covered by one definition or label. In most cases, multiple issues will overlap with one another.

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



## Indicators of abuse and neglect

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

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

**Emotional abuse:** the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue (also known as child on child abuse) in education and all staff should be aware of it and of the school's policy and procedures for dealing with it.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy, for example, as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

## Mental health

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

Staff are not expected or trained to diagnose mental health conditions or issues, but may notice behaviours that may be of concern. Where staff have a mental health concern about a student that may also be a safeguarding concern, they should immediately raise the issue by informing the DSL or deputy.

### **Supporting students with mental health conditions**

New Chapter Primary School is committed to supporting children with mental health conditions to ensure they are able to fully access the school's curriculum and go on to live happy and fulfilled lives.

Through the school's PSHE programme, students are made aware of how to live healthy lives to ensure both their physical and mental wellbeing.

New Chapter Primary School can become aware of students with mental health issues in a number of different ways:

- Students express a wish to access support themselves
- Staff observations of concerning behaviour or through conversation with students
- Parents contact New Chapter Primary School for advice or to inform us of their child's situation
- External agencies are involved and contact New Chapter Primary School to discuss the situation or in-school support

The support at New Chapter Primary School includes:

#### **Teachers**

As Teachers have daily contact with their class, it is sometimes appropriate for them to offer basic support. Teachers deliver the school's PSHE programme which addresses issues surround mental health and wellbeing.

#### **Pastoral Team**

The Pastoral Team works closely with students displaying signs of anxiety or distress. This may involve one to one sessions to talk through difficulties and identify strategies that students may find helpful. Students presenting with these difficulties are brought to the attention of the Pastoral Lead/Designated Safeguarding Lead and the Student and Family Support Advisor to ensure that their situation is being closely monitored and can be referred for further action when necessary.

#### **Educational Psychologist**

The Trust's Educational Psychologist provides support for students as well as advice and guidance for staff and parents.

### **Child on child abuse**

All staff should be aware that children and young people can be perpetrators of abuse towards other children (often referred to as child on child abuse), and it can happen both in and out of school and online.

All staff should understand, that even if there are no reports in the school it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding child on child abuse they should speak to their DSL or DDSL. It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, many of which are

listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to a culture of unacceptable behaviours, an unsafe environment for children and in worst case scenarios a culture that normalises abuse leading to children accepting it as normal behaviour and not coming forward to report it.

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

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

**Procedures for dealing with allegations of child-on-child abuse**

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

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

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

At New Chapter Primary School we will not tolerate this sort of behaviour and all allegations will be investigated robustly. Victims of any form of child on child abuse should be reassured that they are being taken seriously, that they are being supported and will be kept safe. They 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. Procedures are clearly explained in other school policies which contribute to our safeguarding responsibilities. Where there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm, advice will be sought from the Milton Keynes Multi Agency Safeguarding Hub (MASH) and a referral may be made. The police may also be informed.

The school will take action to ensure that the safety and welfare of all students, including the victim, the accused and others directly or indirectly involved. Parents will be informed at the earliest opportunity.

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

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards girls, and initiation or hazing type violence towards boys
- Ensuring our curriculum helps to educate students about appropriate behaviour and consent
- Ensuring students know they can talk to staff confidentially by speaking to a member of the pastoral team.
- Ensuring staff are trained to understand that a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed

### **Sharing nudes and semi-nudes**

The school will follow the approach based on guidance from the UK Council for Child Internet Safety (UKCIS) [Sharing nudes and semi-nudes \(December 2020\)](#). If staff are made aware of an incident involving sharing nudes and semi-nudes (also known as ‘youth produced sexual imagery’), they must report it to the DSL or DDSL immediately.

**Staff must not:**

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

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

Following a report of an incident, the DSL hold an initial review meeting with appropriate staff and will make a decision about the next steps. This will depend on whether there is an immediate risk to student(s) and if a referral needs to be made to the police and/or Children's Social Care. In most cases parents will be informed at an early stage and involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

The DSL will refer to the guidance from the UK Council for Child Internet Safety (UKCIS) with regard to making a referral to the police and/or children's social care.

If at any point in the process there is a concern that a young person has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

If it is necessary to refer an incident to the police, this will be via a safer schools officer or by dialling 101

If a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review. This will include interviews with the students involved (if appropriate) to establish the facts and assess the risks.

All sexting incidents and the decisions made in responding to them will be recorded on MyConcern.

## Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. The breadth of issues classified within online safety is considerable, but can be categorised into four areas of risk:

- **Content:** being exposed to illegal, inappropriate or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **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 with the intention to groom or exploit them for sexual, criminal, financial or other purposes'
- **Conduct:** personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images(e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying
- **Commerce:** risks such as online gambling, inappropriate advertising, phishing or financial scams.

At New Chapter Primary School we use appropriate software that prevents unauthorised access to illegal websites. It also prevents access to inappropriate websites; what is appropriate, or inappropriate is

determined by the age of the user and is reviewed in response to an incident. Individual concerns are reported to the Online safety Lead/DSL/Pastoral Team immediately for further investigation and recorded on MyConcern.

Students receive ongoing education through Relationships, Sex and Health Education (RSHE) where there is a specific focus on the risks of social media in relation to keeping safe online.

## Sexual violence and sexual harassment between children

**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.

Sexual violence and sexual harassment can occur between two children of any age and sex; incidents can happen in school as well as outside the school premises and online. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. We must maintain an attitude of **it could happen here**'. Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of this and that more likely it will be perpetrated by boys. It is important that all victims are taken seriously and offered appropriate support. Staff should be aware that some groups are potentially more at risk. Evidence shows that girls, children with SEND and LGBT children are at greater risk.

Staff should be aware of the importance of:

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

When responding to reports of sexual violence or sexual harassment the adult should report the disclosure to the DSL or DDSL and record the details on MyConcern.

It is important to:

- listen carefully to the child
- be non-judgemental
- be clear about boundaries
- not ask leading questions
- explain how the report will be progressed

The DSL should carefully consider:

- the wishes of the victim on how to proceed
- the nature of the alleged incident, including whether a crime may have been committed
- the ages of the children involved
- the developmental stages of the children involved
- any power imbalance between the children; for example, the alleged perpetrator being older, more mature, or more confident or the victim having a disability or learning difficulty
- if the alleged incident is a one-off or part of a sustained pattern of abuse
- if there are any ongoing risks to the victim, other children or school staff
- other wider contextual safeguarding

The DSL will manage any report on a case-by-case basis and will make the required referrals to the MASH or the Police. Support will be provided for all parties involved.

### Children missing from education

A child going missing from education is a potential indicator of abuse or neglect. At New Chapter Primary School there are procedures for addressing unauthorised absence and for dealing with children that go missing from education, particularly on repeat occasions. This helps identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of their going missing in future. The school will make every attempt to ensure parents provide at least two emergency contacts for their child.

It is essential that all staff are alert to signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns such as travelling to conflict zones, Female Genital Mutilation and honour-based abuse or forced marriage. MK Together provides further information relating to this in [Children Missing from Education](#)

### Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

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

Child Criminal Exploitation occurs where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage of the perpetrator or facilitator and/or (c) through the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology. **It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. Both boys and girls can be criminally exploited although indicators may not be the same. Children who have been criminally exploited may also be at higher risk of sexual exploitation.**

### County Lines

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

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

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

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

## **Honour-based Abuse**

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), forced marriage, and practices such as breast ironing. All forms of so called HBA are abuse (regardless of the motivation) and should be handled and escalated as such. 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.

## **FGM mandatory reporting duty**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practice 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 5 and 8.

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



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. Staff should not assume that FGM only happens outside the UK.

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

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

**Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out.**

Unless the teacher has a good reason not to, they should discuss any such case with the school's Designated Safeguarding Lead who will involve Children's Social Care as appropriate. The duty does not apply in relation to at risk or suspected cases (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence) or where the woman is 18 or over. In these cases, teachers should follow school safeguarding procedures.

### **Forced marriage**

Forcing a person into a marriage is a crime in England and Wales. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools can play an important role in safeguarding children from forced marriage. [MKSCB Forced Marriage guidance](#)

## Preventing radicalisation

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

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

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

Early indicators of extremism or radicalisation may include:

- Showing sympathy for extremist causes
- Glorifying violence, especially to other faiths or cultures
- Making remarks or comments about being at extremist events or rallies outside school
- Evidence of possessing illegal or extremist literature
- Advocating messages similar to illegal organisations or other extremist groups
- Out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- Secretive behaviour
- Online searches or sharing extremist messages or social profiles
- Intolerance of difference, including faith, culture, gender, race or sexuality
- Graffiti, art work or writing that displays extremist themes
- Attempts to impose extremist views or practices on others
- Verbalising anti-Western or anti-British views
- Advocating violence towards others

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

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

## Prevent

From 1 July 2015 specified authorities, including all schools are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty.

The statutory [Revised Prevent duty guidance: for England and Wales](#) (for schools) summarises the requirements on schools in terms of four general themes:

- Schools are expected to assess the risk of children being drawn into terrorism, including support for extremist ideas that are part of terrorist ideology. This means being able to demonstrate both a general understanding of the risks affecting children and young people in the area and a specific understanding of how to identify individual children who may be at risk of radicalisation and what to do to support them. Schools should have clear procedures in place for protecting children at risk of radicalisation. These procedures may be set out in existing safeguarding policies. It is not necessary for schools to have distinct policies on implementing the Prevent duty
- Prevent duty builds on existing local partnership arrangements. For example, governing bodies and proprietors of all schools should ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board. Effective engagement with parents / the family should also be considered as they are in a key position to spot signs of radicalisation. It is important to assist and advise families who raise concerns and be able to point them to the right support mechanisms. Schools should also discuss any concerns in relation to possible radicalisation with a child's parents in line with the individual school's safeguarding policies and procedures unless they have specific reason to believe that to do so would put the child at risk
- Prevent guidance refers to the importance of Prevent awareness training to equip staff to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Individual schools are best placed to assess the training needs of staff in the light of their assessment of the risk to pupils at the school of being drawn into terrorism. As a minimum, however, schools should ensure that the designated safeguarding lead undertakes Prevent awareness training and is able to provide advice and support to staff on protecting children from the risk of radicalisation
- Schools must ensure that children are safe from terrorist and extremist material when accessing the internet in schools

## Channel

Staff should understand when it is appropriate to make a referral to the Channel programme. 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. In addition to information sharing, if a staff member makes a referral to Channel, they may be asked to attend a Channel panel to discuss the individual referred to determine whether support is required. Channel panels are chaired by the local authority and include the police for the relevant local authority area. Following a referral the panel will assess the extent to which identified individuals are vulnerable to being drawn into terrorism, and, where considered appropriate and necessary consent is obtained, arrange for support to be provided to those individuals.

## Domestic abuse

In April 2021, the [Domestic Abuse Act \(2021\)](#) received Royal Assent and introduced a statutory definition.

The Domestic Abuse Act 2021 (Part 1) defines domestic abuse as any of the following behaviours, either as a pattern of behaviour, or as a single incident, between two people over the age of 16, who are 'personally connected' to each other:

- Physical or sexual abuse
- Violent or threatening behaviour
- Controlling or coercive behaviour
- Economic abuse (adverse effect of the victim to acquire, use or maintain money or other property; or obtain goods or services)
- Psychological, emotional or other abuse.

People are 'personally connected' when they are, or have been married to each other or civil partners; or have agreed to marry or become civil partners. If the two people have been in an intimate relationship with each other, have shared parental responsibility for the same child, or they are relatives.

The definition of Domestic Abuse applies to children if they see or hear, or experience the effects of, the abuse; and they are related to the abusive person.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of sexual identity, age, ethnicity, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home.

### Operation Encompass

[Operation Encompass](#) operates in the majority of 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 support to be given to the child according to their needs. New Chapter Primary School receives information from Operation Encompass. The National Domestic Abuse helpline (0808 2000 247) can be called free of charge and in confidence.

### Homelessness

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

## Remote Learning

For information around remote learning, refer to the Remote Learning Policy.

### 13. Cross reference to other school policies

New Chapter Primary School recognises that a number of other school policies and procedures form part of the wider Safeguarding and Child Welfare agenda and therefore this Child Protection Policy should be read in conjunction with other relevant school policies and documents.

### 14. Policy review

The governing body is responsible for reviewing this policy annually and ensuring that it is compliant with current legislation and good practice. Also for ensuring that the school maintains an up to date list of key contacts and related policy and procedures are kept up to date. This policy will be updated annually unless otherwise required due to new legislation.

### 15. Contacts and further information

**To make a referral or consult Children's Services regarding concerns about a child:**

Multi-Agency Safeguarding Hub (MASH)

Tel: 01908 253169 or 253170 during office hours or,

Emergency Social Work Team 01908 265545 out of office hours

Email: [children@milton-keynes.gov.uk](mailto:children@milton-keynes.gov.uk)

**For allegations about people who work with children:**

Contact the MASH as above or,

Local Authority Designated Office (LADO)

Tel: 01908 254300 or 01908 254306

Email: [lado@milton-keynes.gov.uk](mailto:lado@milton-keynes.gov.uk)

**In any case where an adult is concerned that a child is, or may be, at risk of significant harm they must make a referral directly to Milton Keynes Council Multi Agency Safeguarding Hub (MASH):**

**If a child or other person is at immediate risk of harm, the first response should always be to call the police on 999.**

**If you are worried about a child and need advice the NSPCC helpline can be contacted on 0808 800 5000**