



# Halstead Community Primary The Pioneer Academy

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# Safeguarding and Child Protection Policy 2024-2025

Date policy agreed: September 2024

Review date: September 2025

All school staff (including temporary, supply staff, contractors and volunteers) will have access to a copy of this policy. The policy will also be available to parents and carers via the school website and school office.

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# **Key Contacts**

# The safeguarding team

Role	Name	Contact number
Designated Safeguarding Lead	Sue Saheed	01959 532224
Designated Prevent Lead	Sue Saheed	01959 532224
Deputy Designated	Lisa Carter	01959 532224
Safeguarding Leads	Natalie Crowe (from 4 <sup>th</sup>	
	November 2024)	
Designated teacher for looked	Sue Saheed	01959 532224
after and previously looked		
after children		
Designated Mental Health Lead	Sue Saheed	01959 532224

# Other school contacts

Role	Name	Contact number
Head Teacher	Sue Saheed	01959 532224
Chair of Governors	Laura Allen	01959 532224
Link Safeguarding Governor	Laura Allen	01959 532224

# Local authority contacts

Service	Contact number	Email address
Early Help	03000 414141	earlyhelp@kent.gov.uk
Children's Social Care Single	03000 411111	socialservices@kent.gov.uk
Point of Contact Consultation		
Line (SPOC)		
Multi-Agency Safeguarding	03000411111	KSCMP.org.uk
Hub (MASH) / Front-door		
Emergency Duty Service	03000 411111	socialservices@kent.gov.uk
	Out of hours 03000419191	
Emotional Wellbeing and	08000113474	
Mental Health Services		
Local Authority Designated	03000410888	kentchildrenslado@kent.gov.uk
Officer		
Virtual School Head	03000 412777	VSK@kent.gov.uk

# Other contacts

NCDCC Whiatlable wing balaling	0000 030 0305
NSPCC Whistleblowing helpline	0800 028 0285
The DfE counter-extremism helpline	020 7340 7264
	counter.extremism@education.gsi.gov.uk
NSPCC FGM Helpline:	08000283550 Email: fgmhelp@nspcc.org.uk
Operation Encompass Teachers' Advice	0204 513 9990
and Helpline	

Harmful Sexual Behaviour Support Service	0344 2250623 hsbsupport@swgfl.org.uk
helpline for Practitioners	

# FLOWCHART Actions to take if you have a concern

# Why are you concerned?

#### For example

- Allegation/ child shares a concern or worry
- Indicators of abuse or neglect

# Immediately record your concerns

Record concern on CPOMS



# **Actions for the Safeguarding Team**

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Consult the Kent threshold document for further guidance.
- If the child is at imminent risk of harm an <u>urgent</u> referral will be made to Kent Integrated Children's Portal
- If the child is NOT at imminent risk then a standard referral will be made to Kent Integrated Children's Portal

# If you are unhappy with the response

# Staff:

# Follow local escalation procedures

Follow Whistleblowing procedures

# **Pupils and Parents:**

Follow school complaints procedures

# Record decision making and action taken on CPOMS

#### **Monitor** - Be clear about:

- What action you have taken at the time of reporting the concerns.
- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

# **Review** and **request further support** (if necessary)

At all stages the child's circumstances will be kept under review

The DSL/Staff will request further support if required to ensure the **child's safety** is **paramount** 

# **Section 1: Introduction**

# Our commitment to safeguarding

The Pioneer Academy takes seriously its responsibility to protect and safeguard the welfare of children and young people in its care, and provide a safe environment in which children are kept safe, feel safe and can learn. Our staff and governors are committed to safeguarding the pupils at this school and contribute to multi-agency working to keep children safe.

Safeguarding and promoting the welfare of children is everyone's responsibility and everyone who comes in to contact with children and their families has a role to play. At The Pioneer Academy, we expect all staff and governors to make sure that their approach is child-centred by considering, at all times, what is in the best interests of the child.

All staff are expected to contribute to the culture of vigilance. No single practitioner can have a full picture of a child's needs and circumstances, therefore everyone in our school has a role to play in identifying concerns, sharing information, and taking prompt action.

All adults working in our school maintain an attitude of 'it could happen here'. We recognise that staff, because of their contact with and knowledge of children in our school, are well placed to identify abuse, neglect or exploitation and offer support to children in need.

The Pioneer Academy is committed to promoting equality and preventing discrimination on the grounds of disability, ethnicity, gender, age, religion or belief and sexual orientation.

#### **Definitions**

'Safeguarding' and promoting the welfare of children is defined for the purposes of this policy as:

- providing help and support to meet the needs of children as soon as problems emerge;
- protecting children from maltreatment, whether that is within or outside the home, including online;
- preventing the impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes

**'Child protection'** refers to the activities undertaken to protect children who have been identified as suffering or being at risk of suffering significant harm.

**'Staff'** refers to all those working for or on behalf of the school, full time or part time, temporary or permanent, in either a paid or voluntary capacity including supply staff and contractors.

'Child' includes everyone under the age of 18.

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

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

**'Exploitation**' - Children can be exploited by adult males or females, as individuals or groups. They may also be exploited by other children, who themselves may be experiencing exploitation — where this is the case, it is important that the child perpetrator is also recognised as a victim. Perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases, the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

This policy should be considered alongside other related school policies. These are:

Acceptable use of technology Lettings Administration of Medicines Managing allegations against staff Anti-bullying Online safety Attendance **PSHE** Behaviour Remote learning Children missing in education Risk assessment Curriculum Health Relationship Education and Data Protection and GDPR Education First Aid Safer Recruitment Health and Safety Staff code of conduct Intimate Care Whistleblowing

# Policy Adoption, Monitoring and Review

The School Board will monitor the safeguarding arrangements in the school to ensure that these arrangements are having a positive impact on the safety and welfare of children.

Policy adopted by the School Board on: 25th September 2024

Signature of the Chair of Governors:

Policy due for review on: September 2025

# **Section 2: Roles and Responsibilities**

Safeguarding children is everyone's responsibility and as such everyone has a role to play. This policy applies to all staff including supply staff and contractors, volunteers and governors. It also applies to extended school and off-site activities.

#### The School Board

It is the role of the School Board to ensure that our school meets the statutory duties with regard to safeguarding and protecting children as set out in the statutory guidance Keeping Children Safe in Education (2 September 2024).

#### The School Board must:

- Comply with their duties under legislation.
- Have regard to Keeping Children Safe in Education (2 September 2024).
- Ensure that policies, procedures and training in the school are effective, comply with the law at all times, and are known to all staff including supply staff, contractors and regular volunteers.
- Understand the Local Safeguarding Children's Partnership criteria for action and protocol for assessment and ensure they are reflected in policies and procedures.
- Ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the UK GDPR.
- Be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and the local multi-agency safeguarding arrangements

The School Board has appointed a senior board level (or equivalent) lead to take leadership responsibility for the school's safeguarding arrangements. Their details are in the Key Contacts section.

#### **Head Teacher**

- Ensures the implementation of this policy, all procedures and other related policies.
- Monitors the effectiveness of this policy and reports annually to the School Board on the effectiveness of the policy.
- Communicates this policy to parents when their child joins the school and via the school website.
- Ensures that staff, including temporary staff, contractors and volunteers are aware of this policy and the systems which support safeguarding as part of their induction.
- Work closely with the named link governor for child protection.
- Nominates a Designated Safeguarding Lead (DSL) and Deputies.
- Provides adequate funding, training and resources for the DSL to undertake their role including
  ensuring that the DSL has appropriate time to undertake the role and that there is always adequate
  cover if the DSL is absent.
- Ensures that all staff undertake appropriate safeguarding and child protection training and update this regularly.
- Creates and provides a learning environment that is safe, secure, warm and welcoming for children combined with sound security systems and procedures.

- Establishes an environment where children feel safe to talk and a culture where children are listened to.
- Has in place effective anti-bullying strategies.
- Regularly reports to the School Board and keeps them updated in relation to safeguarding within the school.
- Provides leadership and vision in respect of equality.
- Follows safer recruitment procedures when appointing new staff.
- Acts as the 'case manager' in the event of an allegation of abuse made against another member of staff (including supply staff, contractors and volunteers), where appropriate.
- Ensures the relevant staffing ratios are met, where applicable.

# The Safeguarding Team

The safeguarding team at our school comprises of:

Sue Saheed - Designated Safeguarding Lead (DSL)

Lisa Carter and Natalie Crowe (from 4th Nov 2024) - Deputy Designated Safeguarding Leads (DDSLs)

- The DSL is a senior member of staff from the senior leadership team. Their contact details are stated in the Key Contacts section. They take lead responsibility for safeguarding and child protection in our school (including online safety and understanding the filtering and monitoring systems and processes in place), and the role is explicit in their job description.
- In addition we have Deputy Designated Safeguarding Leads (DDSLS), they are trained to the same standard as the DSL, and support the DSL in their role.
- The DSL and DDSLs work closely together and have access to the same level of information about children in our school.
- The safeguarding team work closely with the Local Safeguarding Partners and other agencies as set out in Working Together to Safeguard Children (2023).
- The DSL or DDSLs use the document NPCC When to call the police, when considering calling the police.
- The DSL and DDSLs are aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance PACE Code C 2019.
- The DSL and/or DDSLs are available during school hours in term time.
- The DSL and DDSLs provide support to staff to carry out their safeguarding duties and liaise closely with other services such as Local Authority Children's Social Care.
- The DSL and DDSLs will have a complete picture of what is happening for children in our school and are the most appropriate people to advise on the response to safeguarding concerns.

The role of the Designated Safeguarding Lead is set out fully in Appendix 2.

# The Designated Prevent Lead

The role of the Designated Prevent Trained Lead is to ensure compliance with the Prevent 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. They will:

- Assess the risk of children being drawn into terrorism within the school, including support for extremist ideas with a specific understanding of how to identify individual children who may be at risk
- Ensure that safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Partners.
- Assess the training needs of staff in light of their assessment of the risk to pupils at the school being drawn into terrorism.
- Provide advice and support to other members of staff on protecting children from the risk of radicalisation.
- Ensure that children are safe from terrorist and extremist material.
- Help to raise the awareness of the importance of online safety within the school to children.

The Designated Prevent Lead has undertaken Prevent Awareness training.

### All staff

Every adult in our school has a key role to play in identifying concerns early, providing help for children, and preventing concerns from escalating.

#### All staff:

- Must always act in the best interests of the child.
- Have a responsibility to provide a safe environment in which children can learn.
- Must be familiar with the policies and procedures within our school which support safeguarding.
- Should be aware of the indicators of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. This information is provided through regular training and updates. Definitions and indicators are set out in Appendix 1.
- Must know what to do if a child tells them that they are being abused or neglected (see section 3).
- Must follow the procedures set out in section 3 when they have a concern about a child.
- Should have an awareness and understanding of the provisions in place for online filtering and monitoring of the school's IT system and devices, and know how to report concerns when identified.
- Should understand information sharing and confidentiality, only involving those who need
- to be involved.
- Should be aware of the local early help process, understand their role in it, and be prepared to identify children who may benefit from early help.
- Should be aware of the process of making referrals to Local Authority Children's Social Care and understand the role they may be expected to play in any assessment.
- Should be prepared to refer concerns to Local Authority Children's Social Care.
- Should maintain an attitude of 'it could happen here' where safeguarding is concerned.

# **Pupils**

All pupils have a right to feel safe, be listened to, have their wishes and feelings taken into account and be supported by all adults within the school.

We will support all pupils

- to learn how to keep themselves safe by understanding how to get help when they need it.
- to understand the basic safeguarding procedures in school such as identification of visitors (lanyard system).
- to learn how to assess risk for themselves and how to keep themselves safe, including online.
- by providing opportunities to express their feelings and opinions about safeguarding issues.
- to contribute to the development of school safeguarding policies.

# **Parents and Carers**

We are committed to working with parents positively, openly and honestly. We ensure that all parents are treated with respect, dignity and courtesy. We respect parents' rights to privacy and confidentiality and will not share sensitive information unless we have permission, or it is necessary to do so in order to safeguard a child.

The school may be required to provide reports about children as part of the early help, child in need (Section 17 Children's Act 1989) or child protection (Section 47 Children's Act 1989) process. We will provide opportunity for parents/carers to see the content of reports for child protection conferences in advance of the conference.

Parents and carers have a responsibility to:

- work in partnership with the school to safeguard and promote the welfare of children.
- understand and adhere the relevant school policies and procedures.
- talk to their children about safeguarding issues with their children and support then school in their safeguarding approaches.
- identify behaviours which could indicate that their child is at risk of harm including online.
- seek help and support from the school or other agencies.
- provide at least two up to date contact telephone numbers and inform the school as soon as possible if the telephone numbers change.

## Multi-agency working

We recognise and are committed to our responsibilities to work within the Kent Multi Agency Partnership safeguarding arrangements, including contributing to Local Safeguarding Children Partnership processes as required. The leadership team and DSL will work to establish strong and cooperative local relationships with professionals in other agencies in line with statutory guidance.

We recognise the importance of multi-agency working and are committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm, including participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

#### The role of appropriate adult

The role of the appropriate adult is to safeguard the rights, entitlements and welfare of children and vulnerable adults in police custody. This adult must not be a police officer or otherwise associated with the police. Examples of an appropriate adult include, but are not limited to, a parent, relative, social worker, teacher or, if the person is in the care of a local authority or voluntary organisation, a person

representing that authority or organisation. Note that an appropriate adult is not required when a pupil is eighteen or above.

The DSL and DDSLs are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

Police and Criminal Evidence Act (1984) – Code C (PACE) states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes of this Code and any other Code. PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The DSL or DDSLs will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS. If having been informed of the vulnerabilities, the DSL or DDSL does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person for whom there are grounds to suspect of an offence must be cautioned

- 1. before questioned about an offence
- 2. or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

A Police Officer must not caution a juvenile or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.

The appropriate adult' means, in the case of a child:

- 1. the parent, guardian or, if the juvenile is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
- 2. a social worker of a local authority
- 3. failing these, some other responsible adult aged 18 or over who is not:
  - a. a police officer;
  - b. employed by the police;
  - c. under the direction or control of the chief officer of a police force; or
  - d. a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions,

Further information can be found in the Statutory guidance - PACE Code C 2019.

# Training, induction, and awareness

# The Designated Safeguarding Lead and Deputies

The DSL and DDSLs undertake training specific to their role. This training is updated every two years. The DSL has undertaken Prevent awareness training.

#### Staff induction

All staff, including supply staff, contractors and volunteers who work or volunteer in our school, undertake a safeguarding induction with the DSL or DDSLs. Induction will occur prior to, or on the first day of employment or working with children.

#### This includes:

- An explanation of our school's safeguarding and child protection procedures.
- An explanation of how to use the CPOMS electronic reporting system and log in details.
- An explanation of the identities and roles of the DSL and DDSLs.
- Keeping Children Safe in Education (2 September 2024) Part 1 (DSL, DDSLs, Senior Leaders, Trustees and Governors to read the full guidance).
- Child protection and safeguarding policy.
- Behaviour policy.
- Staff code of conduct
- Our school's response to children who go missing from education.
- Whistleblowing policy.

Staff are required to confirm that they have read, and understood the above policies and procedures and a record of this is kept on CCR.

# Staff training

All staff receive appropriate safeguarding and child protection training, including online safety (which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction and repeated at least annually. In addition we ensure that their knowledge is kept regularly updated, and checks of knowledge undertaken throughout the school year. This provides them with relevant skills and knowledge to safeguard children effectively.

## Safer Recruitment training

At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education (2 September 2024), and will be in line with local safeguarding procedures.

# Governors

All governors receive appropriate safeguarding and child protection training (including online) at induction and updated regularly. This ensures they have the knowledge and information needed to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures

in place in the school are effective and support the delivery of a robust whole school approach to safeguarding.

# Safeguarding through the curriculum

We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

We ensure that children are taught about keeping themselves safe through our comprehensive PSHE curriculum which is in line with the statutory requirements for Relationship Education and Health Education. In addition we deliver these messages through assemblies, circle times and P4C lessons.

Relationships Education for primary pupils covers the characteristics of healthy relationships, building the knowledge and understanding that will enable children to model these behaviours.

As part of the curriculum we deliver the NSPCC PANTS lessons to all pupils. Talk PANTS helps children understand that their body belongs to them, and they should tell someone they trust if anything makes them feel upset or worried.

We use Purple Mash to support messages around Online Safety.

Teachers should let the designated safeguarding lead and other relevant staff know when they are teaching these topics, so they are prepared to support pupils who disclose or are affected by the issues raised

Please refer to our PSHE and RSE Policies for further details.

# **Online safety**

The governing body has had due regard to the additional information and support set out in Keeping Children Safe in Education (2 September 2024) and will ensure that the school has a whole school approach to online safety and has a clear policy on use of communications technology in the school. We recognise the potential risks to children online and safeguard them from potentially harmful and inappropriate online material in our school through ensuring that appropriate filters and monitoring systems are in place on school owned devices and networks.

# Filtering and monitoring

The school filtering and monitoring systems (SENSO), policies and procedures are agreed by Governors, the DSL and other senior leaders, and technical staff. These are regularly reviewed to monitor their effectiveness and updated in response to changes in technology and patterns of online safety incidents or behaviours.

The school meets the standards set out in the Department for Education Guidance 'Filtering and Monitoring Standards for School and Colleges'. In doing so we:

Identify and assign roles and responsibilities to manage filtering and monitoring systems.

- Review filtering and monitoring provision at least annually.
- Block harmful and inappropriate content without unreasonably impacting teaching and learning.
- Have effective monitoring strategies in place that meet their safeguarding needs.

#### Filtering

- The school manages access to content across its systems for all users and ensures that illegal content is filtered by the broadband or filtering provider.
- There are established and effective routes for users to report inappropriate content.
- There is a clear process in place to deal with requests for filtering changes.
- Younger learners will use child friendly/age-appropriate search engines.
- Filtering logs are regularly reviewed and alert the school to breaches of the filtering policy, which are then acted upon by the DSL.
- Access to content through non-browser services (e.g. apps and other mobile technologies) is managed in ways that are consistent with school policy and practice.
- If necessary, the school will seek advice from, and report issues to, the SWGfL Report Harmful Content site.

#### Monitoring

- The school has monitoring systems (SENSO) in place to protect the school, systems and users: The school follows the UK Safer Internet Centre Appropriate Monitoring guidance and protects users and school systems through the use of the appropriate blend of strategies strategy informed by the school's risk assessment. These may include:
- physical monitoring (adult supervision in the classroom)
- internet use is logged, regularly monitored and reviewed
- filtering logs are regularly analysed and breaches are reported to senior leaders
- pro-active alerts inform the school of breaches to the filtering policy, allowing effective intervention.

The school monitors all network use across all its devices and services.

There are effective protocols in place to report abuse/misuse.

There is a clear process for prioritising response to alerts that require rapid safeguarding intervention. Management of serious safeguarding alerts is consistent with safeguarding policy and practice.

Technical monitoring systems are up to date and managed and logs/alerts are regularly reviewed and acted upon.

# Reviewing online safety

We carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks our pupils face.

# Use of mobile phones and smart technology

We recognise that many children have unlimited and unrestricted access to the internet via mobile phone networks. This access means some children, whilst in school, sexually harass other children via

their mobile and smart technology, share indecent images: consensually and non-consensually (often via large chat groups), and view and share pornography and other harmful content.

# Remote learning

Staff have been provided with clear guidance around providing remote learning, including appropriate use of devices and ensuring there are clear parameters about contact with children in order for children and staff to be kept safe.

Staff are reminded that when engaging with children and / or parents online they have a responsibility to model safe practice at all times.

Staff are also reminded of the need to adhere to our Staff Code of Conduct and 'Safer Working Practice for those working with children and young people in education settings' guidance (2022).

Staff delivering remote learning must report any concerns they have about children, or adults who are working with children, in line with the procedures set Section 3 of this policy.

Further advice is set out in the guidance 'Safeguarding and remote education (2022)'.

Please refer to our Remote Learning Policy.

### **Safer Working Practices**

All members of staff are required to work within clear guidelines set out in the Staff code of conduct.

Guidance about acceptable conduct and safe practice will be given to all staff and volunteers as part of their induction. These are sensible steps that every adult should take in their daily professional conduct with children. This advice can be found in the Safer Recruitment Consortium 'Guidance for safer working practice for those working with children and young people in education settings (2022)'. All staff and volunteers are expected to carry out their work in accordance with this guidance and will be made aware that failure to do so could lead to disciplinary action.

If staff, visitors, volunteers or parent helpers are working with children alone they will, wherever possible, be visible to other members of staff. They will be expected to inform another member of staff of their whereabouts in school, who they are with and for how long. Doors, ideally, should have a clear glass panel in them and be left open.

Staff should be aware of the professional risks associated with the use of electronic communication and should familiarise themselves with advice and professional expectations outlined in the school's Acceptable Use Policy.

# Physical Intervention and reasonable force

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a child needs to be restrained to

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

We acknowledge that staff must only ever use physical intervention as a last resort, when a child is endangering themselves or others, and that at all times it must be the minimal force necessary to prevent injury to another person.

Such events should be recorded and signed by a witness.

Staff who are likely to need to use physical intervention will be appropriately trained. A list of staff that have accessed physical intervention training will be kept by the Headteacher/Designated Safeguarding Lead and updated in-line with the guidance 'Use of Reasonable force in schools'. All incidents will be recorded in-line with guidance.

Staff should be aware of the school's Behaviour Policy, and any physical interventions must be in line with agreed policy and procedures.

We understand that physical intervention of a nature which causes injury or distress to a child may be considered under child protection or disciplinary procedures.

# **Section 3: Procedures**

All staff working in our school must maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff must always act in the best interests of the child.

We will ensure that when there is a safeguarding concern for a child, that the child's wishes and feelings are taken into account when deciding what action will be taken and what services will be provided.

#### Concerns about a child

All concerns must be reported using the CPOMS (see below).

In addition to your electronic report you must report all concerns in person to the DSL / DDSLs.

- You may be concerned about a child due to something that you have seen or heard, or you may have noticed a change in their behaviour or presentation. Through training and regular reminders and updates, all staff are trained to notice potential signs and indicators of abuse and neglect or to identify children who may benefit from Early Help (see section 5).
- It is important that all concerns, no matter how small they may seem, are reported and recorded appropriately. Your piece of information, added to other information held by the DSL or noted at a later date, may be an important part of the picture.
- If you have any concerns about a child's welfare it is important that you act on them immediately.
- If you are concerned that a child is in immediate danger or risk of significant harm you must act immediately and speak to the DSL or DDSLs before recording your concern in writing.
- If in exceptional circumstances the DSL / DDSLs is not contactable, this should not delay action being taken and you must report your concern to any member of the senior leadership team, and /or take advice from Local Authority Children's Social Care (contact details in Key contacts section).
- You should never assume that another colleague or professional has reported the concern. The DSL would rather receive the same report in duplication than not receive it at all.

# **Recording on CPOMS**

All concerns must be reported using the CPOMS.

#### You must:

- Record as soon as possible.
- Ensure that all sections are completed including the full date and time of when the concern was noticed, the location, any other people present.
- Keep information as factual as possible.
- Use the child's (or adult's) own words where applicable using quotation marks for direct quotes.
- Use the body map to record any marks or injuries and describe these in the main body of the concern.
- Do not take photographs.
- Record any actions that you have taken or plan to take if applicable.

You should receive feedback from the Safeguarding team. If you have not received feedback, or you feel that the situation is not improving or getting worse then you have a duty to speak to the DSL or DDSLs. The Safeguarding Team can only give you information on a 'need to know' basis and in line with information sharing guidance (see Information sharing and confidentiality below). At a minimum they will be able to tell you that they have received your concern and are taking action which is in the best interests of the child.

If you do not feel that any or the correct action has been taken, you have a duty to challenge the decision (see Whistleblowing below).

#### Responding to a concern from a child

It can be very difficult for children to speak out about abuse. They may fear the consequences, worry that they won't be believed or not understand that what they are experiencing is abuse. Children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

If a child speaks to you about information suggesting that they are at risk of, or being abused, this is known as a disclosure. Disclosure is a process by which children start to share their experiences of abuse with others, and can take place over a long period of time. They may tell you a lot of information, tell you something small to see how you react, or mention something in passing. Some children make disclosures non-verbally through writing, drawing or other forms of communication such as through their play. All disclosures should be taken seriously.

If a child chooses to talk to you about a concern, it is important to recognise that they have placed you in a position of trust, and as such you should be supportive and respectful of the child.

You must never promise a child that you will not tell anyone about a report of abuse, as this may not be in the best interests of the child.

Additional consideration needs to be given to pupils with communication difficulties and for those whose preferred language is not English. It is important to communicate with them in a way that is appropriate to their age, understanding and preference.

- **Listen** carefully to what the child is saying. Don't display shock or indicate that you don't believe them. Let them talk freely without interrupting.
- **Reassure** them that they have done the right thing by telling you. Let them know that you are taking what they have told you seriously, and that they can trust you to do the right thing.
- **Explain** what you are going to do next that you will be speaking to someone who will be able to help.
- Report what you have been told as soon as possible. Try to use the child's own words.

# Support for pupils to report concerns

We take seriously all concerns reported by children, whether about themselves or others. We let pupils know that we listen to them, value their contributions and take action when they raise a concern, no matter how small it may seem. We have the following systems in place:

We regularly remind pupils through circle time PSHE lessons and assemblies that they can talk to any adult if they have a worry or concern about themselves or another child. Pupils are made aware that whilst all adults are responsible for keeping them safe, certain adults in the school have extra responsibilities in keeping children safe and they are the Designated Safeguarding Lead and Deputy Designated Safeguarding Lead.

All classrooms have a Worry Box in which children can report a concern or request to speak to an adult.

We recognise that certain children may face additional barriers to telling someone about abuse or neglect because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

We ensure that children with Special Educational Needs and Disabilities are able to report concerns through the above methods, with the additional support of the SENDCo and individual work with Class Teachers.

We ensure that the above methods are well promoted, easily understood and easily accessible.

Concerns and worries reported by pupils will always be treated seriously and they will be reassured that they can safely express their views and give feedback.

In addition to the above, we recognise that some pupils will communicate their worries through changes in their presentation and behaviour and show signs or act in ways that they hope adults will notice and react to. We do not rely on children telling us that they are experiencing abuse or neglect, and staff must report all concerns, no matter how small to enable the safeguarding team to build a picture of what is happening for the child.

# Actions for the safeguarding team when a report has been made

- If a child is at risk or immediate harm or significant harm, contact Local Authority Children's Social Care. If a child is in immediate danger then you may also consider contacting the Police on 999. (See below section Making a referral to Local Authority Children's Social Care).
- If they have not already been contacted, contact the parents/carers to discuss the concern. You may choose to contact Local Authority Children's Social Care before contacting the parents/carers in order to seek advice.
- If you believe that sharing the information with the parents/carers places the child at increased risk, you may choose not to contact them at this point. You must record the reason for this decision on CPOMS.
- When contacting the parents/carers, explain your concerns and gain their views and ask for any
  additional information. Advise them of your next steps and explain that a record of your
  conversation and all actions will be kept.

# Options will include:

- Managing any support for the child internally via the school's pastoral support process.
- Undertaking or referring for an early help assessment.
- Making a referral to statutory services if the child is in need, or suffering, or likely to suffer harm.
- Refer to the Local Authority threshold document to support your decision regarding what action to take.
- Consider the concern in relation to any other information that you have on the child (and other family members if appropriate). This may be records of previous concerns, behaviour information and/or attendance data.
- Record all decisions, actions and outcomes on CPOMS.
- Feedback to the member of staff who reported the concern in terms of actions and outcomes. Information should be provided on a 'need to know' basis and consider information sharing advice for practitioners guidance (2024). See Information sharing and confidentiality below.

# **Contacting parents / carers**

In most instances, concerns about the welfare or safety of children will be discussed with the parents/carers. The Safeguarding team will decide who is best to speak to the parents/carers, sometimes this will be a DSL or DDSLs or sometimes it will be another staff member such as the Class Teacher. A record of all discussions will be kept, including the views of the parents/carers.

There will be times when the Safeguarding Team assess that to do so would place the child at increased risk. We have a duty to prioritise the needs of the child, and on these occasions, we have to consult with other agencies before we contact the parents/carers.

When making a referral to Local Authority Children's Social Care, we will usually contact the parents/carers to share the information in the referral and ask for the parents/carers views. If it is felt that by speaking to the parents/carers first there is an increased risk to the child, the referral may be made without discussion with them. All decisions for referring and reasons why the parents/carers have not been contacted first will be recorded.

#### Making a referral to Local Authority Children's Social Care

In most cases the DSL or DDSLs will make the referral to Local Authority Children's Social Care. However it is the right of any individual to make direct referrals or raise concerns directly with Local Authority Children's Social Care. If for any reason you believe that the nominated persons have not responded appropriately to your concerns, it is then your responsibility to consider contacting the Local Authority Children's Social Care directly.

We refer to the Local Authority threshold document when making decisions about referrals to social care.

#### A referral may be required when:

- a child is suffering or likely to suffer harm.
- early help support is not leading to improvements for a child or their situation is getting worse.

- the parents/carers do not consent to an early help assessment and it is felt that without help the child's needs will escalate.
- a family is requesting this support.

Referrals are made to the Local Authority in which the child lives.

Contact details for Local Authority Children's Social Care are in the Key Contacts section.

Referrals should be made initially by telephone and then followed up with a written referral within 24 hours.

#### Referrals should include:

- the reason for the referral and nature of the concern.
- your assessment of the child's needs -what is life like for the child?
- the voice of the child including behaviours displayed.
- the capacity of the parents/carers to meet those needs and any external factors that may be undermining their capacity to parent.
- whether the concern involves abuse or neglect.
- a chronology of any previous concerns and actions / interventions taken.
- information about other practitioners or agencies who are providing services to the child and/or their family.
- the consent and views of the parents/carers, or reason for over-riding this.
- what you want to happen next.

Where an early help assessment has already been undertaken, it should be used to support a referral to local authority children's social care.

The completed referral will be shared with parents/carers, who will be asked to provide consent to the information being shared. If consent is refused, or it is considered that the child would be placed at risk if the information is shared prior to reporting to social care, the information can still be shared where there is good reason to do so.

Please refer to Keeping Children Safe in Education (2 September 2024) and Working Together to Safeguard Children guidance (2023) for details of the actions that the local authority will take once the referral has been received.

The local authority should acknowledge receipt of the referral within one working day, this should be followed up if the information is not forthcoming.

# **Escalating concerns or resolving professional differences**

If, after referral, the child's situation does not appear to be improving, we will consider following
the local escalation procedures to ensure that the concerns have been addressed and that the
child's situation improves.

- If it is felt that a decision made by another professional in another agency is not in the child's best interests, then this must be acted upon. In the first instance, this takes place directly with the professional involved to allow opportunity for decision-making to be discussed and clarified.
- If this fails to resolve the issues identified, the member of the safeguarding team should escalate within their own organisation (to the Head Teacher if they are not in this role). The issue is then escalated to the professional's line-manager. (Escalation/Case Resolution)
- The intention to instigate escalation procedures must be made explicit and in writing.
- At all stages, records should be kept.

Safeguarding concerns and allegations made about staff, including supply teachers, volunteers, contractors and organisations or individual using the school premises

# Reporting concerns

Safeguarding concerns or allegations about another member of staff (including supply staff, other staff, volunteers, contractors and organisations or individuals using the school premises) posing a risk of harm to children must be responded to in the following way:

- Referred to the Head Teacher.
- Concerns or allegations about the Head Teacher should be referred to the Chair of Governors.

### Recording and responding

Concerns not meeting the harms test (also known as low-level concerns) must be reported to the Headteacher or whoever has been nominated by the Head Teacher to receive the low-level concerns. (It will usually be the DSL if the DSL is not the Head Teacher). The nominated person must always report the low-level concerns to the Head Teacher. See further information below.

Allegations against a teacher who is no longer teaching, and historical allegations should be referred to the police.

If the allegation meets any of the following criteria (the harms test), the Head Teacher must report it to the Local Authority Designated Officer (LADO) on the same day. Their contact details are in the Key Contacts section:

- behaved in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- 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.

For all other allegations, the Head Teacher will decide if further enquiries are required prior to referral to the LADO.

We have a duty of care to our employees. We will ensure that we provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended.

Where we are not the employer, we still have responsibility to ensure allegations are dealt with appropriately.

We will liaise with relevant parties.

When dealing with allegations we will apply common sense and judgment; and deal with allegations quickly, in a fair and consistent way that provides effective protection for the child, at the same time supporting the person who is the subject of the allegation.

Prior to contacting the Local Authority Designated Officer we will conduct basic enquiries in line with local procedures to establish the facts and help determine whether there is any foundation to the allegation, whilst being careful not to jeopardise any future police investigation.

Full procedures are set out in Part four of Keeping Children Safe in Education (2 September 2024). Further guidance is available in the Allegations Against Staff Policy.

# Concerns that do not meet the harm threshold (also known as low-level concerns)

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in the section above.

A low-level concern is any concern that an adult has acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
- does not meet the allegations threshold or is not considered serious enough to refer to the local authority designated officer (LADO)

Examples of low-level concerns could include:

- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child one-to-one in a secluded area or behind a closed door
- humiliating pupils

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

It is important that all concerns, no matter how small, are shared and recorded and dealt with appropriately. By identifying concerning, problematic, or inappropriate behaviour early we are able to minimise the risk of abuse to children and ensure that adults working or volunteering in our school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of our school.

Reporting all concerns, no matter how small, allows us to address unprofessional behaviour and support the individual to correct it at an early stage; and provide responsive, sensitive and proportionate handling of such concerns when they are raised.

## Self-referring

Staff should self-refer if they have found themselves in a situation which might 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.

#### Recording and responding to low-level concerns

Secure and confidential records of all low-level concerns will be kept.

- Records will include the details of the concern, how the concern arose, the rationale for decision made and the actions taken.
- The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.
- Records will be reviewed so that patterns of concerning behaviour can be recognised and appropriate action can be taken.
- Reports about supply staff and contractors will be notified to their employers, so any potential patterns of inappropriate behaviour can be identified.

Further information is contained in our Staff Code of Conduct and Allegations Against Staff Policies.

## Whistleblowing / Raising concerns about the management of safeguarding

All staff in our school should feel able to raise concerns about poor or unsafe practice and potential failures in our safeguarding regime. Such concerns will be taken seriously be the senior leadership team.

The procedures are set out in The Pioneer Academy Whistleblowing Policy.

A whistleblowing disclosure must be about something that affects the general public such as:

- a criminal offence has been committed, is being committed or is likely to be committed;
- a legal obligation has been breached;
- there has been a miscarriage of justice;
- the health or safety of any individual has been endangered;
- the environment has been damaged or
- information about any of the above has been concealed.

If a staff member feels unable to raise the issue within the school, or feels that their genuine concerns are not being addressed, then staff can contact the NSPCC's Whistleblowing helpline on 0800 028 0285 or email help@nspcc.org.uk.

# **Record keeping**

All concerns, discussions and decisions made, and the reason for these decisions, are recorded on CPOMS.

Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved

a note of any action taken, decisions reached and the outcome

Records are kept separate from the child's main file, kept confidential and stored securely and are only accessible to the DSL and DDSLs.

If you are unclear as to recording requirements, please speak to the DSL / DDSLs.

#### Transfer of files

Where a pupil leaves the school, the DSL will ensure that their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term.

If the receiving school uses CPOMS, then the file will be transferred electronically.

Paper files are transferred separately from the main pupil file Where possible paper files are transferred by hand, and where this is not possible, they are delivered by secure post. A confirmation receipt is obtained.

If considered appropriate, the DSL will share any information with the new school or college in advance of the chid leaving. This allows the new school to continue to support the child and have appropriate support in place for when the child joins the new school.

When a new pupil joins our school we write to the previous school to request confirmation as to whether they have every had any concerns recorded for the child.

When a pupil becomes Home Educated or moves abroad, any child protection files are passed to the Local Authority who will retain the file.

# Information sharing and confidentiality

Information sharing is vital in identifying and tackling all forms of abuse and neglect, and in promoting children's welfare, including their educational outcomes.

Staff should not assume a colleague or another professional will take action and share information that might be critical in keeping children safe. They should be mindful that early information sharing is vital for effective identification, assessment, and allocation of appropriate service provision.

- If in any doubt about sharing information, staff should speak to the DSL or DDSLS.
- 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 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe.

Child protection information will be stored and handled in line with the Data Protection Act 2018 and HM Government guidance 'Information Sharing: Advice for Practitioners Providing Safeguarding Services for Children, Young People, Parents and Carers' (2024). This guidance also provides advice to staff who have to make decisions about sharing information.

#### Safer recruitment

We are committed to ensure that we develop a safe culture within our school, and that all steps are taken to recruit staff and volunteers who are safe to work with our pupils and staff. We are committed to the principles of safer recruitment, and as part of that we adopt recruitment procedures that help deter, identify and reject unsuitable candidates.

We ensure that at least one of the persons who conducts an interview has completed Safer Recruitment Training and ensure that Safer Recruitment procedures are adhered to at all times.

We ensure that detailed checks are carried out and evidence is provided e.g. criminal record checks (Disclosure and Barring Service (DBS) checks), barred list checks and prohibition checks, together with references and interview information this will aid the school in making a decision about the suitability of the prospective employee.

Part 3 of Keeping Children Safe in Education (2 September 2024) sets out the full requirements for Safer Recruitment including the definition of regulated activity.

Further information can be found in the Safer Recruitment Policy.

# Single Central Record

The Pioneer Academy maintains a single central record of pre-appointment checks in line with statutory guidance.

#### Risk assessments for volunteers

We undertake a written risk assessment when deciding whether a person working as a volunteer in the school should be asked to apply for an enhanced Disclosure and Barring Service certificate. We use the Flowchart set out in Part 3 of Keeping Children Safe in Education (2 September 2024) to guide our decision making, and all decisions are recorded in writing and retained.

#### The use of school premises by other organisations

When hiring or renting out school facilities/premises to organisations or individuals we ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided under the direct supervision or management of the school, our arrangements for child protection will apply in line with this, and other relevant polices.

Where services or activities are provided separately by another body we will seek assurance that the body concerned has in place appropriate safeguarding and child protection policies and procedures.

We will ensure that safeguarding requirements are included in any transfer of control arrangements (i.e. lease or hire agreement) as a condition of the use and occupation of the premises; and any failure to comply with this will lead to termination of the agreement. The guidance on 'Keeping Children Safe in Out of School Settings' details the arrangements that providers are expected to have in place.

Should an allegation relating to an incident that happened when an individual or organisation is using the school premises come to our attention, we will follow our safeguarding policies and procedures, including informing the Local Authority Designated Officer.

Please refer to the Lettings Policy for further information.

# **Site security**

All staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light. Staff will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

Appropriate checks will be undertaken in respect of visitors and volunteers coming into the school. Visitors and volunteers must only enter through the main entrance and after signing in at the office will be issued with a school lanyard which must be displayed when on site. Any individual on site who is not known or identifiable by a visitor's pass may be challenged by any staff member for clarification and reassurance.

Visitors will be expected to adhere to any safety arrangements implemented.

Lanyard system:

Green - visitors who have provided a valid DBS and Photo ID  $\,$ 

Red - Visitors who must be accompanied

# **Section 4: Responding to specific concerns**

# **Extra-familial harms**

Safeguarding incidents and/or behaviours can be associated with factors outside the school or and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs 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, sexual abuse, serious youth violence and county lines.

We contribute to referrals to, and assessments undertaken by, Local Authority Children's Social Care by providing as much information as possible in relation to extra-familial context and harm. This allows any assessment to consider all the available evidence and the full context of any abuse.

## Online risks and harms

All concerns regarding online safety must be reported on CPOMS and reported to the DSL or DDSLs in person.

We recognise the potential risks to children online and safeguard them from potentially harmful and inappropriate online material in our school through appropriate filters and monitoring systems (see Section 2 for further information).

All staff are made aware through this policy and training that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life. Children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

The use of technology has become a significant component of many safeguarding issues such as child sexual exploitation, radicalisation and sexual predation and technology often provides the platform that facilitates such harm.

Online safety issues 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 and or financial scams.

# Child on child abuse

# Reporting, recording and responding

- We encourage pupils to confidentially report abuse (see Support for children to report concerns in Section 3). Pupils are regularly reminded that they can speak to any member of staff in the school if they have a worry or concern.
- Staff must report any concerns regarding child on child on abuse, following the procedures set out in section 3. All allegations and concerns will be recorded on CPOMS and investigated and dealt with in line with this policy and the school's Behaviour and Anti-bullying policies.
- In all cases, if staff are unsure, they should always speak to the DSL or DDSLs.
- We recognise that children are capable of abusing other children and take all concerns and reports seriously. We will support the victim and understand that the child who is perpetrating the abuse may also be at risk or experiencing harm and will consider them as a potential victim and support them appropriately. Appropriate cases will be considered for referral to children social care for assessment of need.

#### What is child on child abuse?

Child on child abuse can take forms such as, but is not limited to:

- bullying (including cyberbullying, prejudice-based bullying and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse (including online elements which facilitate, threaten and/or encourage physical abuse)
- sexual violence, such as rape, assault by penetration and sexual assault (including online elements which facilitate, threaten and/or encourage sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment
- causing someone to engage in sexual activity without consent
- consensual and non-consensual sharing of nudes and semi-nudes images and or videos
- upskirting
- initiation/hazing type violence and rituals.

Child on child abuse can happen both inside and outside of school and/or online. We recognise that even if there are no reports in our school that it does not mean that it is not happening, it may be that it is not being reported.

Children can abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content.

#### How we minimise the risk of child on child abuse

#### Whole school culture

In our school, child on child abuse will not be tolerated or passed off as "just banter", "just having a laugh", "part of growing up" or "boys will be boys" as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

We recognise the gendered nature of child on child abuse and that it is more likely that girls will be victims and boys perpetrators, but that all child on child abuse is abuse and will be taken seriously.

We understand the importance of challenging inappropriate behaviours between children that are abusive in nature. Addressing all inappropriate behaviour, even if seemingly innocuous, can be an important intervention that helps prevent problematic, abusive, and/or violent behaviour in the future.

Staff have an important role to play in preventing it and responding where they believe a child may be at risk from it by:

- Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images.
- Being vigilant to issues that particularly affect different genders for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.

#### Curriculum

The PSHE curriculum supports pupils to develop an understanding of acceptable behaviour, healthy relationships, keeping themselves safe and consent. Please see section 5 for further details.

# Staff training, awareness and response

Through training and updates, staff are trained to recognise the indicators and signs of child on child abuse, how to identify it and respond to reports.

# Behaviour expectations

The school's Behaviour Policy sets out the expectations for appropriate behaviour by pupils in our school. We make it clear that child on child abuse is not acceptable, will never be tolerated and is not an inevitable part of growing up.

#### Risk assessments

Risk assessments may be written for pupils, who have been identified as being at increased risk of child on child abuse (considered for both the pupil perpetrating the abuse and the pupil who is the victim). These will be shared with the parent/carer and the pupil concerned.

# Support for victims, perpetrators and any other child affected by child on child abuse

The needs and wishes of the victim should be paramount (along with protecting the child) in any response. It is important they feel in as much control of the process as is reasonably possible. Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space

for them. The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

We continue to have a duty to provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions. Taking disciplinary action and still providing appropriate support are not mutually exclusive actions. They can, and should, occur at the same time if necessary.

A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school. We will work with professionals as required to understand why a child may have abused another child. As a child, any alleged perpetrator(s) is entitled to, deserving of, and should be provided with, a high level of support to help them understand and overcome the reasons for their behaviour and help protect other children by limiting the likelihood of them abusing again.

In cases of child on child sexual violence and sexual harassment, further guidance is provided around support for victims and support and disciplinary action for alleged perpetrator(s) in Part 5 of the guidance Keeping Children Safe in Education (2 September 2024).

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

Children who are LGBT can be targeted by their peers. In some cases, a child who is perceived by their peers to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. We will not tolerate discrimination of this nature.

#### **Bullying (including cyberbullying)**

'Bullying is the repetitive, intentional hurting of one person or group by another person or group, where the relationship involves an imbalance of power. It can happen face to face or online' - *The Anti-Bullying Alliance*.

The school's Anti-bullying Policy sets out how we respond to incidents of bullying.

# Child on child sexual violence and sexual harassment

# Reporting and recording procedures

- Reports of child on child sexual violence and harassment, including those outside the school or online must be reported to the DSL / DDSLs in person, and recorded on CPOMS.
- The DSL and DDSLs will take a leading role, using their professional judgment and supported by other agencies, such as Local Authority Children's Social Care and the police as required.
- The DSL and DDSLs will follow the guidance set out in Part 5 of Keeping Children Safe In Education (2 September 2024), which provides further guidance on actions to consider following a report.
- The Police will be an important partner where a crime might have been committed. We follow the advice NPCC When to Call the Police when making these decisions.

#### Support for victims

• All victims will be reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe.

- Abuse that occurs online or outside of the school will not be downplayed and will be treated equally seriously.
- A victim will never be given the impression that they are creating a problem, made to feel ashamed, or their experience minimised.
- We will ensure that victims are protected, offered appropriate support and every effort made to ensure their education is not disrupted.

# Support for alleged perpetrator(s)

- We have a duty to provide the alleged perpetrator(s) with an education, safeguarding support as appropriate and implement any disciplinary sanctions.
- A child abusing another child may be a sign they have been abused themselves or a sign of wider issues that require addressing within the culture of the school.
- Taking disciplinary action and providing appropriate support, can, and should, occur at the same time if necessary.

## Information for all staff

Sexual violence and sexual harassment can occur between two children of any age and sex from primary through to secondary stage and into colleges. It can also occur through a group of children sexually assaulting or sexually harassing a single children or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally).

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 and will be exacerbated if the alleged perpetrator(s) attends the same school. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Our school has a zero tolerance approach to sexual violence and sexual harassment. Sexual violence and sexual harassment is not acceptable and will not be tolerated in our school. We will not tolerate or dismiss sexual violence or sexual harassment as "banter", "part of growing up", "just having a laugh" or "boys being boys".

All staff have a responsibility to challenge behaviour (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

Some groups are potentially more at risk such as girls, children with special educational needs and disabilities, and LGBT children.

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

# Reporting and recording procedures

- Report it to the DSL or DDSLs immediately.
- Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download this is illegal.

- If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL.
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.
- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL.
- Record the incident on CPOMS.

#### Actions for the DSL

The DSL will follow the guidance set out in section 2 of the 'Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024)' guidance which deals with 'Handling incidents'.

# Securing and handing over devices to the police

If any devices need to be seized and passed onto the police, then the device(s) should be confiscated, and the police should be called. The device should be turned off and placed under lock and key until the police are able to come and retrieve it. Further information is available in the guidance for schools 'Searching, screening and confiscation – Advice for schools (2022)'.

# Information for all staff

The information below is taken from the 'Sharing nudes and semi-nudes: advice for education settings working with children and young people (2024) guidance'.

The terms sexting and 'sharing nudes and semi-nudes' mean the sending or posting of nude or semi-nude images, videos or live streams by young people under the age of 18 online. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices.

The term 'nudes' is used as it is most commonly recognised by young people and more appropriately covers all types of image sharing incidents.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse other children e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

Creating and sharing nudes and semi-nudes of under-18s (including those created and shared with consent) is illegal which makes responding to incidents involving children and young people complex. There are also a range of risks which need careful management from those working in education settings.

# Pupils who may be susceptible to extremist ideology or radicalisation

# Reporting and recording procedures

As part of the Counter Terrorism and Security Act 2015, schools have a duty to 'prevent people being drawn into terrorism'. This has become known as the 'Prevent Duty'.

The Designated Safeguarding Lead has received training about the Prevent Duty and tackling extremism and is able to support staff with any concerns they may have

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.

- Concerns about radicalisation and extremism must be recorded on CPOMS and reported to the DSL or DDSLs.
- The DSL or DDSLs will make a referral to Local Authority Children's Social Care as appropriate.
- In addition, the DSL or DDSLs may consider making a referral to the local authority Channel Panel (seek advice from Local Authority Children's Social Care).

The DfE helpline can be contacted for advice 020 7340 7264 (this should not be used in cases of emergency) or via the e mail <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>

 $Further\ information\ can\ be\ found\ in\ the\ guidance\ 'The\ Prevent\ duty:\ for\ schools\ and\ childcare\ providers'$ 

We use the curriculum to ensure that children and young people understand how people with extreme views share these with others, especially using the internet.

Further information including definition, signs and indicators are set out in APPENDIX 3.

# **Female Genital Mutilation (FGM)**

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 may face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies

Reporting (Mandatory Reporting Duty) and recording procedures

- You must personally report to the police (by calling 101) cases where you discover that an act of FGM appears to have been carried out.
- Unless you have good reason not to, you should still consider and discuss any such case with the
  designated safeguarding lead (or deputy) and involve local authority children's social care as
  appropriate. Please note that the duty does not apply in relation to at risk or suspected cases (i.e.
  where you have not discovered that an act of FGM appears to have been carried out, either through
  disclosure by the victim or visual evidence).
- If a direct disclosure has not been made and there is no visual evidence, but you have concerns that the pupil may have been subject to or at risk of FGM you must report this on CPOMS and report to the DSL or DDSLs in person.
- The DSL will follow the local safeguarding procedures by involving the local authority children's social care.

### Actions for the DSL/DDSLs

- Consider the information and check this against any previous information of concern for the pupil.
- Consider whether there are any risk factors present for the pupil or their family including any siblings in the school.
- Where it is deemed appropriate to do so, speak to the parent or carer about FGM, unless doing so risks putting the girl in danger.
- Where appropriate consult with or make a referral to Local Authority Children's Social Care.

# Further advice and guidance

The National FGM Centre 'Female Genital Mutilation: Guidance for Schools' provides detailed information on FGM including exploring concerns with children, parents and carers and making referrals.

NSPCC FGM Helpline: 0800 028 3550 Email: fgmhelp@nspcc.org.uk

Further information including definition, signs and indicators are set out in APPENDIX 3.

# Section 5: Support for children and their families

## **Early Help**

'Providing early help is more effective in promoting the welfare of children than reacting later. Early help means providing support as soon as a problem emerges, at any point in a child's life, from the foundation years through to the teenage years. Early help can also prevent further problems arising, for example, if it is provided as part of a support plan where a child has returned home to their family from care, or in families where there are emerging parental mental health issues or drug and alcohol misuse.' Working Together to Safeguard Children (2023)'.

# Identifying children and families who may benefit from early help

All staff are trained to identify children who may benefit from early help. Staff should discuss their concerns with the DSL or DDSLs. We recognise that providing early help is more effective in promoting the welfare of children than reacting later.

Children and their families may need support from other agencies at times in their lives. Where a child and their family would benefit from co-ordinated support from more than one agency, the school will refer to the Local Authority Early Help Family Solutions Team to request an early help assessment. Early help assessments work with families to identify help and support to prevent needs escalating and is provided with the full consent of the parents/carers and/or the child depending on their age and understanding.

All families may benefit from early help at some point in their lives. Our staff are alert to the potential need for early help for:

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

Children receiving early help will be kept under constant review and consideration given to a referral to Local Authority Children's Social Care if the child's situation does not appear to be improving or is getting worse.

# **Operation Encompass**

We work in Partnership with Kent Police and children's services to identify and provide appropriate support to children who have experienced domestic violence in their household; this scheme is called Operation Encompass. 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. We will record this information and store this information in accordance with the record keeping procedures outlined in this policy.

# Children requiring additional support or with additional vulnerabilities

We recognise that whilst all children should be protected there are some groups of children who are potentially at greater risk of harm and, and additional barriers can exist for some children with respect to recognition and / or disclosure

We give special consideration to children who:

- have special educational needs (SEN) or disabilities, whether or not they have a statutory Education, Health and Care Plan
- have, or have previously had a social worker
- are Young carers
- may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- have English as an additional language
- are known to be living in difficult situations for example, temporary accommodation or where there are issues such as substance abuse, adult mental health or domestic abuse
- are at risk of Female Genital Mutilation, child sexual exploitation, child criminal exploitation, gang involvement, forced marriage, or radicalization
- are at risk of modern slavery, trafficking or exploitation
- are asylum seekers
- are privately fostered
- · are at risk due to either their own or a family member's mental health needs
- are looked after or previously looked after
- are frequently missing from school, home or care.

# Children with special educational needs and disabilities (SEND)

We recognise that children who have special educational needs and disabilities can face additional safeguarding challenges as well as barriers to adults recognising abuse and neglect. These include:

• assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration.

- being more prone to peer group isolation than other children.
- the potential for being disproportionally impacted by behaviours such as bullying and harassment, without outwardly showing any signs.
- communication barriers and difficulties in overcoming these barriers.

Any reports of abuse involving children with SEND will require close liaison with the DSL and the Special Educational Needs Co-Ordinator (SENCO).

### Children who need a social worker (Child in Need and Child Protection Plans)

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect, exploitation and/or complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Where children have lived through adversity or traumatic experiences, this can create lasting barriers to education which make it difficult for them to achieve good outcomes, and can limit the support they receive elsewhere from parents, carers or wider networks.

The DSL holds information on all children who currently have or previously had a social worker. They use this information to make decisions in the best interests of the child's safety, welfare and educational outcomes. This information informs the school's decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

When a child has a Social Worker under a Child in Need or Child Protection Plan, this will inform decision about safeguarding such as responding to absences and missing education and promoting welfare such as provision of pastoral and academic support.

Teaching staff are supported by the members of the safeguarding team to maintain high aspirations for these children, identifying the challenges these children may face and making adjustments to teaching and learning to best support them.

# Looked after children and previously looked after children

We recognise that the most common reason for children becoming looked after is as a result of abuse and / or neglect. We recognise that a previously looked after child potentially remains vulnerable. Through training we ensure that staff have the skills, knowledge and understanding to keep looked after and previously looked after children safe.

When a child in our school is Looked After we ensure that the appropriate staff have the information they need in relation to a child's legal status and contact arrangements with birth parents or those with parental responsibility. The DSL hold the details of the child's social worker and name of the virtual school head in the authority that looks after the child. The contact details of the virtual school head for our Local Authority are in the Key Contacts section.

The school governing body has appointed a designated teacher who works with the local authority to promote the educational achievement of children who are looked after and previously looked-after. Their details are in the Key Contacts section. They follow the guidance set out in the statutory guidance 'The designated teacher for looked after and previously looked after children'.

The designated teacher and other staff work with multi-agency professionals, including the Local Authority Virtual Schools Head, to ensure that prompt action is taken when necessary to safeguard these children. We recognise these children are a particularly vulnerable group.

Previously looked after children remain vulnerable, therefore our school will work with other agencies to keep them safe. The designated teacher for looked after children has responsibility for promoting the education achievement of children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

We ensure that appropriate staff have the information they need in relation to a child's looked after legal status and contact arrangements, as well as information about the child's care arrangements.

# Children requiring mental health support

We 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. We are aware of how these children's experiences can impact on their mental health, behaviour and education.

We recognise that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem, however school staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

## Reporting and responding to concerns

If staff have a mental health concern about a child that is also a safeguarding concern then immediate action should be taken. Staff should report their concern on CPOMS and speak to the DSL or DDSLs.

All Staff can access further advice in the guidance 'Mental health and behaviour in schools (2018)'.

#### **Young carers**

The Carers Trust defines a young carer as 'Someone under 18 who helps look after someone in their family, or a friend, who is ill, disabled, has a mental health condition or misuses drugs or alcohol'.

The designated safeguarding lead will consider the concerns for either an 'Early Help' intervention or a referral to Social Care if appropriate.

### **Private fostering**

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.

A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer.

If we become aware that a child is living, or there is an intention for them to live in a private fostering arrangement, we have a mandatory duty to notify the local authority to allow them to check the arrangement is suitable and safe for the child.

Staff should notify the DSL or DDSLs when they become aware of private fostering arrangements. The DSL will speak to the family of the child involved to check that they are aware of their duty to inform the Local Authority.

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 are lesbian, gay, bi, or trans (LGBT)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT. Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open.

We endeavour to reduce the additional barriers faced, and provide a safe space for them to speak out or share their concerns with members of staff.

### Children who are absent or missing from education

All staff should be aware that children who are absent from education for prolonged periods or repeatedly, can act as a vital warning sign of a range of safeguarding possibilities. This may include abuse and neglect, which may include sexual abuse or exploitation and child criminal exploitation. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of female genital mutilation or risk of forced marriage.

We recognise that, when a pupil is not in school, they may be vulnerable to or exposed to other risks.

#### Actions that we take

We monitor attendance carefully and address poor or irregular attendance without delay We will always follow up with parents/carers when pupils are not at school.

We hold at least two up to date contacts numbers for parents/carers. (Parents should remember to update the school as soon as possible if the numbers change)

The school has staff who understand what to do when children do not attend regularly.

Through training, all staff know the signs and triggers for travelling to conflict zones, FGM and forced marriage.

We have appropriate policies (Attendance Policy), procedures and responses for pupils who go missing from education (especially on repeat occasions). These procedures include our duty to inform the local authority when we plan to take pupils off-roll when they

- leave school to be home educated
- move away from the school's location
- remain medically unfit beyond compulsory school age
- are in custody for four months or more (and will not return to school afterwards)
- are permanently excluded

We ensure that pupils who are expected to attend the school, but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we record the name of the pupil's new school and their expected start date

We follow the Government 'Children Missing Education' and 'Local Authority Children Missing from Education & Pupils Added/Removed from Roll' Guidance.

# **Elective Home Education (EHE)**

Where a parent or carer expresses their intention to remove a pupil from our school with a view to educating them at home, we will work together with the Local Authority and other key professionals to coordinate a meeting with the parents/carers where possible. Ideally this will be before a final decision has been made, to ensure that the parents/carers have considered what is in the best interests of the child.

# **Appendix 1: Abuse, Neglect and Exploitation**

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education (2 September 2024). More guidance on recognising signs and symptoms of abuse can be found in the guidance document 'What to do if you're worried a child is being abused'. Abuse, neglect, exploitation 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.

**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. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. 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 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 (see Section 4)

**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.

**Exploitation**: We recognise that children can be exploited either criminally (Child criminal exploitation - CCE) or sexually (Child Sexual Exploitation - CSE).

We know that different forms of harm often overlap, and that perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation.

# **Appendix 2: Role of the Designated Safeguarding Lead**

Governing bodies and proprietors should ensure an appropriate senior member of staff, from the school or college leadership team, is appointed to the role of designated safeguarding lead. The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). This should be explicit in the role holder's job description.

The designated safeguarding lead should have the appropriate status and authority within the school or college to carry out the duties of the post. The role of the designated safeguarding lead carries a significant level of responsibility, and they should be given the additional time, funding, training, resources and support they need to carry out the role effectively. Their additional responsibilities include providing advice and support to other staff on child welfare, safeguarding and child protection matters, taking part in strategy discussions and inter-agency meetings, and/or supporting other staff to do so, and contributing to the assessment of children.

### Deputy designated safeguarding leads

It is a matter for individual schools and colleges as to whether they choose to have one or more deputy designated safeguarding leads. Any deputies should be trained to the same standard as the designated safeguarding lead and the role should be explicit in their job description. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for child protection, as set out above, remains with the designated safeguarding lead, this lead responsibility should not be delegated.

## **Availability**

During term time the designated safeguarding lead (or a deputy) should always be available (during school or college hours) for staff in the school or college to discuss any safeguarding concerns. Whilst generally speaking the designated safeguarding lead (or deputy) would be expected to be available in person, it is a matter for individual schools and colleges, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and/or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead, to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

### Manage referrals

The designated safeguarding lead is expected to refer cases:

- of suspected abuse and neglect to the local authority children's social care as required and
- support staff who make referrals to local authority children's social care
- to the Channel programme where there is a radicalisation concern as required and support
- staff who make referrals to the Channel programme
- where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring
- Service as required, and

• where a crime may have been committed to the Police as required. NPCC – When to call the police should help understand when to consider calling the police and what to expect when working with the police.

# **Working with others**

The designated safeguarding lead is expected to:

- act as a source of support, advice and expertise for all staff
- act as a point of contact with the safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult. Further information can be found in the Statutory guidance PACE Code C 2019.
- as required, liaise with the "case manager" (as per Part four) and the local authority designated officer(s) (LADO) for child protection concerns in cases which concern a staff member
- liaise with staff (especially teachers, pastoral support staff, school nurses, IT technicians, senior
  mental health leads and special educational needs coordinators (SENCO), or the named person with
  oversight for SEND in a college and senior mental health leads) on matters of safety and
  safeguarding and welfare (including online and digital safety) and when deciding whether to make
  a referral by liaising with relevant agencies so that children's needs are considered holistically
- liaise with the senior mental health lead and, where available, the mental health support team,
   where safeguarding concerns are linked to mental health
- promote supportive engagement with parents and/or carers in safeguarding and promoting the welfare of children, including where families may be facing challenging circumstances
- work with the headteacher and relevant strategic leads, taking lead responsibility for promoting
  educational outcomes by knowing the welfare, safeguarding and child protection issues that
  children in need are experiencing, or have experienced, and identifying the impact that these issues
  might be having on children's attendance, engagement and achievement at school or college155.
   This includes:
  - ensuring that the school or college knows who its cohort of children who have or have had
    a social worker are, understanding their academic progress and attainment, and
    maintaining a culture of high aspirations for this cohort, and
  - o supporting teaching staff to provide additional academic support or reasonable adjustments to help children who have or have had a social worker reach their potential, recognising that even when statutory social care intervention has ended, there is still a lasting impact on children's educational outcomes.

# Information sharing and managing the child protection file

The designated safeguarding lead is responsible for ensuring that child protection files are kept up to date. Information should be kept confidential and stored securely. It is good practice to keep concerns and referrals in a separate child protection file for each child.

#### Records should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved

a note of any action taken, decisions reached and the outcome.

They should ensure the file is only accessed by those who need to see it and where the file or content within it is shared, this happens in line with information sharing advice as set out in Part one and Part two of the Keeping Children Safe in Education (2 September 2024) guidance.

Where children leave the school or college (including in year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible, and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained.

Receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCO) or the named person with oversight for SEND in colleges, are aware as required.

Lack of information about their circumstances can impact on the child's safety, welfare and educational outcomes. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any additional information with the new school or college in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school or college. For example, information that would allow the new school or college to continue supporting children who have had a social worker and been victims of abuse and have that support in place for when the child arrives.

#### **Raising awareness**

The designated safeguarding lead should:

- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part-time staff
- ensure the school's or college's child protection policy is reviewed annually (as a minimum) and the
  procedures and implementation are updated and reviewed regularly, and work with governing
  bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents know that referrals about suspected abuse or neglect may be made and the role of the school or college in this
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements, and
- help promote educational outcomes by sharing information about welfare, safeguarding, and child
  protection issues that children who have or have had a social worker are experiencing with teachers
  and school and college leadership staff.

#### Training, knowledge and skills

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead (and any deputies) should also undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, how to identify, understand and respond to specific needs that can increase the vulnerability of

children, as well as specific harms that can put children at risk, and the processes, procedures and responsibilities of other agencies, particularly local authority children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- understand the importance of the role the designated safeguarding lead has in providing information and support to local authority children social care in order to safeguard and promote the welfare of children
- understand the lasting impact that adversity and trauma can have, including on children's behaviour, mental health and wellbeing, and what is needed in responding to this in promoting educational outcomes
- are alert to the specific needs of children in need, those with special educational needs and disabilities (SEND), those with relevant health conditions and young carers.
- understand the importance of information sharing, both within the school and college, and with the safeguarding partners, other agencies, organisations and practitioners
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they
  have the relevant knowledge and up to date capability required to keep children safe whilst they
  are online at school or college
- can recognise the additional risks that children with special educational needs and disabilities (SEND) face online, for example, from bullying, grooming and radicalisation and are confident they have the capability to support children with SEND to stay safe online
- obtain access to resources and attend any relevant or refresher training courses, and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

# **Providing support to staff**

Training should support the designated safeguarding lead in developing expertise, so they can support and advise staff and help them feel confident on welfare, safeguarding and child protection matters.

This includes specifically to:

- ensure that staff are supported during the referrals processes, and
- support staff to consider how safeguarding, welfare and educational outcomes are linked,
- including to inform the provision of academic and pastoral support.

## Understanding the views of children

It is important that all children feel heard and understood. Therefore, designated safeguarding leads (and deputies) should be supported in developing knowledge and skills to:

- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, and in any measures the school or college may put in place to protect them, and
- understand the difficulties that children may have in approaching staff about their circumstances and consider how to build trusted relationships which facilitate communication.

### **Holding and sharing information**

The critical importance of recording, holding, using and sharing information effectively is set out in Parts one, two and five of this document, and therefore the designated safeguarding lead should be equipped to:

- understand the importance of information sharing, both within the school and college, and with
  other schools and colleges on transfer including in-year and between primary and secondary
  education, and with the safeguarding partners, other agencies, organisations and practitioners
- understand relevant data protection legislation and regulations, especially the Data Protection Act
   2018 and the UK General Data Protection Regulation (UK GDPR), and
- be able to keep detailed, accurate, secure written records of all concerns, discussions and decisions
  made including the rationale for those decisions. This should include instances where referrals were
  or were not made to another agency such as LA children's social care or the Prevent program etc.

# **Appendix 3: Specific safeguarding issues**

Annex B of Keeping Children Safe in Education (2 September 2024) sets out important information about specific forms of abuse and safeguarding issues which expand on the explanations below. As with all concerns, if you become aware of any of these issues, you must report to the DSL and complete a report on CPOMS.

#### **Extremism and radicalisation**

Children may be susceptible to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk is part of our safeguarding approach.

All staff in our school undertake specific Prevent training.

**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.

**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.

# Indicators that may suggest a pupil is at risk

- 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
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, gender, race or sexuality
- work or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- advocating violence towards others

All staff in our school undertake specific Prevent training (Home Office or other).

# So-called 'honour based' abuse

So-called 'honour-based' abuse (HBA) encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM),

forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators All forms of so-called honour based abuse 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.

# **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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email: fmu@fco.gov.uk

Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages.

#### Female Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is frequently a very traumatic and violent act for the victim and can cause harm in many ways. The practice can cause severe pain and there may be immediate and/or long-term health consequences, including mental health problems, difficulties in childbirth, causing danger to the child and mother; and/or death. FGM is an unacceptable practice for which there is no justification. It is child abuse and a form of violence against women and girls.

FGM is illegal in the UK, it is also illegal to take a British National or permanent resident abroad to undergo FGM or help someone who is trying to arrange to have FGM performed. Staff should not assume that FGM only happens outside the UK.

All staff in our school undertake specific FGM training (Home Office or other).

### Risk factors

- 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
- there is a visiting female elder

- talk of a special procedure or celebration to become a woman
- parents wish to take their daughter out-of-school to visit an 'at-risk' country (especially before the summer holidays)
- parents who wish to withdraw their children from learning about FGM.

## **Potential indicators**

- 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

#### **Domestic abuse**

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members.

Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

## Child criminal exploitation (CCE) and Child Sexual Exploitation (CSE)

Different forms of harm often overlap, and perpetrators may subject children and young people to multiple forms of abuse, such as criminal exploitation (including county lines) and sexual exploitation. In some cases the exploitation or abuse will be in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or will be to the financial benefit or other advantage, such as increased status, of the perpetrator or facilitator.

Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, it is important that the child perpetrator is also recognised as a victim.

Whilst the age of the child may be a contributing factor for an imbalance of power, there are a range of other factors that could make a child more vulnerable to exploitation, including gender, sexual identity, cognitive ability, learning difficulties, communication ability, physical strength, status, and access to economic or other resources.

Children who have been exploited will need additional support to help maintain them in education

Some of the following can be indicators of both child criminal and sexual exploitation where children:

- appear with unexplained gifts, money or new possessions;
- associate with other children involved in exploitation;
- suffer from changes in emotional well-being;
- misuse drugs and alcohol;
- go missing for periods of time or regularly come home late;
- regularly miss school or education or do not take part in education.

Some specific forms of **CCE** can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others

**CSE** is a form of child sexual abuse. Sexual abuse may involve physical contact, including assault by penetration (for example, rape or oral sex) or nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing. It may include noncontact activities, such as involving children in the production of sexual images, forcing children to look at sexual images or watch sexual activities, encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

Some additional specific indicators that may be present in CSE are children who:

- have older boyfriends or girlfriends; and
- suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

Further information on signs of a child's involvement in sexual exploitation is available in Home Office guidance: 'Child sexual exploitation: guide for practitioners'.

# **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs using dedicated mobile phone lines or other form of "deal line".'

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults are exploited to move, store and sell 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 (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are also increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. A number of the indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

#### Serious violence

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery.

Serious violence often peaks in the hours just before or just after school, when pupils are travelling to and from school, therefore being times of particular risk to pupils.

# Appendix 4 – Legislation and guidance

# The following Legislations are referred to within this policy:

Section 17 Children's Act 1989 (Child in Need) states that it is the general duty of every local authority to safeguard and promote the welfare of children within their area who are in need; and so far as it is consistent with that duty, to promote the upbringing of such children by their families.

Section 47 Children's Act 1989 (Child Protection) states that where a child is suspected to be suffering, or likely to suffer, significant harm, the local authority is required to make enquiries, to enable it to decide whether it should take any action to safeguard and promote the welfare of the child.

# The following guidance are referred to within this policy:

- Children missing education
- Child sexual exploitation: guide for practitioners
- Female Genital Mutilation: Guidance for Schools
- Filtering and monitoring standards for schools and colleges
- Guidance on Safer Working Practice for those working with children and young people in education settings
- Information sharing: advice for practitioners providing safeguarding services
- Keeping Children Safe in Education (2 September 2024)
- Keeping Children Safe in Out of School Settings
- Mental Health and Behaviour in Schools
- NPCC when to call the police
- PACE Code C
- Safeguarding and remote education
- Searching, screening and confiscation
- Sharing nudes and semi-nudes: advice for education settings working with children and young people
- The designated teacher for looked after and previously looked after children
- The Prevent duty: for schools and childcare providers
- Use of reasonable force in schools
- What to do if you're worried a child is being abused.
- Working Together to improve school attendance
- Working Together to Safeguard Children

# Appendix 5 – Children who are not collected from school

The responsibility for children who are uncollected from school rests jointly with Children's Social Care and the Head Teacher who will work in partnership to ensure at all times that the needs of the child are the first and paramount consideration. Children who are abandoned by their parents/carers are ultimately required to be accommodated by the Local Authority.

The incidents of uncollected children will be minimised through up-to-date record keeping, clear expectations upon parents and timely and coordinated interventions

The school will ensure that telephones are answered throughout the school day and whilst any uncollected pupil may be on the premises.

Halstead Community Primary School would NOT release children to a person who is not known to us or acting without the parent's written authorisation. Where there is any doubt as to the identity or suitability of such a person and there is no other way of ensuring the child's safety, this will be referred to the police as an emergency.

If there are changes to collection arrangements, please contact the school office on 01959 532224 by 3.00pm to ensure the class teacher is informed and the pupil is aware. In the case of a delay please contact the School Office where your child will remain until you arrive. If there is repeated lateness Children's Social Care may be contacted.

Office Staff will try to make contact with the parents of any child who has not been collected by the end of day. If the call is unsuccessful the office staff will call each contact number for the parent in turn. If there is no answer on any number, attempts will be made at 10-minute intervals until contact is made.

If a child is uncollected and no contact has been made with a parent by 16:00 (end of the day +40 minutes) a member of the senior or middle management team will arrange to remain on site or make themselves available by telephone until suitable arrangements have been made.

If a child is uncollected and no contact has been made with parents by 16:10 (end of the day + 50 minutes) the school will contact the front door team of Children's Social Care and alert them to the situation. The school will then act on the guidance and advice of Children's Social Care until the matter is resolved.

The welfare of pupils is the paramount concern and staff will work the hours required to secure the child's safety. Any hours worked in addition to those that are contracted will either be owed in lieu or overtime will be paid. This will be at the discretion of the Head teacher.

Records will be kept of the name of any pupil collected later than 15:30 and this will be reviewed regularly to identify any concerning trends or patterns, which will then be addressed appropriately.