****

**CANBURY SCHOOL**

**CHILD SAFEGUARDING POLICY**

 **AND PROCEDURES**

**December 2016**

**Last review and update: September 2021**

**CHILD SAFEGUARDING POLICY AND PROCEDURES**

**Table of Contents**

[***1 Policy Statement 6***](#_heading=h.30j0zll)

[***2 Key Personnel and Contacts 8***](#_heading=h.1fob9te)

[***3 Roles and responsibilities 10***](#_heading=h.3znysh7)

[3.1 Designated Safeguarding Lead in School 10](#_heading=h.2et92p0)

[3.2 The Deputy DSLs 12](#_heading=h.tyjcwt)

[3.3 The Headmistress 12](#_heading=h.3dy6vkm)

[3.4 All Canbury School Staff, Supply Staff and Volunteers 13](#_heading=h.1t3h5sf)

[3.5 The Governing Board 15](#_heading=h.4d34og8)

[***4. Confidentiality 16***](#_heading=h.2s8eyo1)

[***5 Definitions and Terminology 17***](#_heading=h.17dp8vu)

[***6 Equalities 17***](#_heading=h.3rdcrjn)

[***7 What is child abuse and neglect? 18***](#_heading=h.26in1rg)

[7a Physical Abuse 18](#_heading=h.lnxbz9)

[7b Emotional Abuse 19](#_heading=h.35nkun2)

[7c Sexual Abuse 19](#_heading=h.1ksv4uv)

[7d Neglect 20](#_heading=h.44sinio)

[***8 Recognising abuse and taking action 21***](#_heading=h.2jxsxqh)

[8a What should staff do if they have a concern about a child 21](#_heading=h.z337ya)

[8b Early Help 22](#_heading=h.3j2qqm3)

[8c What should staff do if a child is in danger or at risk of harm 23](#_heading=h.1y810tw)

[8d Action where a child has serious injuries which require immediate treatment 23](#_heading=h.4i7ojhp)

[8e Action if you have concerns about extremism 23](#_heading=h.2xcytpi)

[8f If you have a mental health concern 24](#_heading=h.1ci93xb)

[8g Actions if you have concerns around Female Genital Mutilation (FGM) 24](#_heading=h.3whwml4)

[8h If you suspect or become aware of an allegation of abuse sexual violence or sexual harassment (including peer on peer/child on child abuse) 25](#_heading=h.2bn6wsx)

[8i Action around sharing nudes or semi-nudes (Sexting) 30](#_heading=h.qsh70q)

[8j What should staff do if they have concerns about another staff member, supply teacher or volunteer 35](#_heading=h.3as4poj)

[8k What should staff do if they have concerns about the Headmistress? 35](#_heading=h.1pxezwc)

[8l What should staff do if they have concerns about safeguarding practices within the school 36](#_heading=h.49x2ik5)

[***9 Disclosure 36***](#_heading=h.2p2csry)

[***10 Action by the DSL 37***](#_heading=h.147n2zr)

[***11 Contacting parents 37***](#_heading=h.3o7alnk)

[***12 Children with special educational needs and disabilities 38***](#_heading=h.23ckvvd)

[***13 Use of ‘reasonable force’ 38***](#_heading=h.ihv636)

[***14 Students with a social worker 38***](#_heading=h.32hioqz)

[***15 Looked-after and previously looked-after children 39***](#_heading=h.1hmsyys)

[***16 Training 39***](#_heading=h.41mghml)

[***17 Complaints and concerns about school safeguarding policies 40***](#_heading=h.2grqrue)

[***18 Whistle-blowing 40***](#_heading=h.vx1227)

[***19 Record keeping 40***](#_heading=h.3fwokq0)

[***20 Review and Monitoring 41***](#_heading=h.1v1yuxt)

[***Appendix A – Taking Action 42***](#_heading=h.4f1mdlm)

[***Appendix B: Actions where there are concerns about a child 43***](#_heading=h.2u6wntf)

[***Appendix C – Procedure to be followed in the event of a disclosure 45***](#_heading=h.19c6y18)

[***Appendix D – Procedure for reporting a concern 46***](#_heading=h.3tbugp1)

[***Appendix E – Allegation of abuse by a member of school staff, supply staff or volunteer (teaching or non-teaching) 47***](#_heading=h.28h4qwu)

[***Appendix F - Referral procedure for when a child/young person discloses to a member of school staff an allegation of abuse by a Headteacher. 48***](#_heading=h.nmf14n)

[***Appendix G – Procedure for referring a concern to CHANNEL 49***](#_heading=h.37m2jsg)

[***Appendix H: allegations of abuse made against staff, including supply teachers and volunteers 50***](#_heading=h.1mrcu09)

[***Appendix I: Specific Safeguarding Issues 60***](#_heading=h.46r0co2)

[Children missing from education, home or care 61](#_heading=h.2lwamvv)

[Peer on Peer/child on child abuse 61](#_heading=h.111kx3o)

[Children missing from education 63](#_heading=h.3l18frh)

[Child Criminal Exploitation (CCE) and Child Sexual Exploitation (CSE) 63](#_heading=h.206ipza)

[Child Criminal Exploitation (CCE) 64](#_heading=h.4k668n3)

[Child sexual exploitation (CSE) 64](#_heading=h.2zbgiuw)

[Domestic Abuse 65](#_heading=h.1egqt2p)

[Elective home education (EHE) 66](#_heading=h.3ygebqi)

[Female Genital Mutilation (FGM) 66](#_heading=h.2dlolyb)

[Forced marriage 68](#_heading=h.sqyw64)

[Homelessness 68](#_heading=h.3cqmetx)

[Sharing of nudes and semi-nudes 68](#_heading=h.1rvwp1q)

[Online safety 72](#_heading=h.4bvk7pj)

[Preventing radicalisation 73](#_heading=h.2r0uhxc)

[Serious Violence 74](#_heading=h.1664s55)

[So-called ‘honour-based’ abuse (including FGM and forced marriage) 74](#_heading=h.3q5sasy)

[Sexual violence and Sexual Harassment 75](#_heading=h.25b2l0r)

[School related weapons incidents 77](#_heading=h.34g0dwd)

[Upskirting 77](#_heading=h.1jlao46)

[***Appendix J: Checking the identity and suitability of visitors 77***](#_heading=h.43ky6rz)

[***Appendix K: Non-collection of children and Missing Students 78***](#_heading=h.2iq8gzs)

[***Appendix J: Safer Recruitment 78***](#_heading=h.xvir7l)

**1 Policy Statement**

Canbury School is committed to safeguarding, defined as: protecting children from maltreatment; preventing impairment of children’s health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes. The welfare of our children is paramount. All children, regardless of age, gender, culture, language, race, ability, sexual identity or religion have equal rights to protection, safeguarding and opportunities.

We expect all staff and volunteers to share this commitment. We have a very important responsibility and duty regarding child protection. We aim to make school a place where all students feel secure and supported and where they are confident that they will be listened to should the need arise. All staff and volunteers should consider, at all times, what is in the best interests of the child.

This policy is based on the Department for Education’s statutory guidance [Keeping Children Safe in Education (September 2021)](https://www.gov.uk/government/publications/keeping-children-safe-in-education--2) and [Working Together to Safeguard Children (2018)](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2), and the [Governance Handbook](https://www.gov.uk/government/publications/governance-handbook). We comply with this guidance and the arrangements agreed and published by our local safeguarding partners.

This policy is also based on the following legislation and guidance:

* Part 3 of the schedule to the [Education (Independent School Standards) Regulations 2014](http://www.legislation.gov.uk/uksi/2014/3283/schedule/part/3/made), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
* [The Children Act 1989](http://www.legislation.gov.uk/ukpga/1989/41) (and [2004 amendment](http://www.legislation.gov.uk/ukpga/2004/31/contents)), which provides a framework for the care and protection of children
* Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](http://www.legislation.gov.uk/ukpga/2015/9/part/5/crossheading/female-genital-mutilation), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
* [Statutory guidance on FGM](https://www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genital-mutilation), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
* [The Rehabilitation of Offenders Act 1974](http://www.legislation.gov.uk/ukpga/1974/53), which outlines when people with criminal convictions can work with children
* Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](http://www.legislation.gov.uk/ukpga/2006/47/schedule/4), which defines what ‘regulated activity’ is in relation to children
* London Child Protection Procedures and Practice Guidance
* [Statutory guidance on the Prevent duty](https://www.gov.uk/government/publications/prevent-duty-guidance), which explains schools’ duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
* [Sexual violence and sexual harassment between children in schools and colleges](https://www.gov.uk/government/publications/sexual-violence-and-sexual-harassment-between-children-in-schools-and-colleges) DfE Guidance

The policy has also been written with regard to the Kingston and Richmond Safeguarding Children Partnership guidance.

Adherence to the School’s Child Safeguarding policy is mandatory for all staff, supply staff

and volunteers and its use is not subject to discretion. Everybody in the school must, therefore, be aware and understand their safeguarding responsibilities, child protection issues, and the procedures set out in this document.

The School is committed to keeping all students safe, healthy and equipped to deal with dangers

presented in their daily lives. Staff raise students’ awareness through various pastoral and curriculum activities, including Personal and Social Education, Health Education, Academic and Personal Tutoring, and thus develop a trusting climate where students are able to develop their understanding of staying safe and talk and share their thoughts and feelings.

Canbury School seeks to implement this policy through adherence to the procedures set out in the rest of this document.

This document is reviewed annually by Carolyn Yates (Headmistress), Philippa Rich (Deputy Head – Pastoral) and by our Governing Body. **The next scheduled date for reviews is August 2022.**

**2 Key Personnel and Contacts**

An effective whole school child protection policy is one which provides clear direction to staff

and others about expected codes of behaviour in dealing with child protection issues. An

effective policy also makes explicit the School’s commitment to the development of good

practice and sound procedures. This ensures that child protection concerns and referrals may

be handled sensitively, professionally and in ways which prioritise the needs of the child.

**The Designated Safeguarding Lead:**

Mrs Philippa Rich

Email: prich@canburyschool.co.uk

Phone number: 020 8549 8622

**The Headmistress and Deputy Safeguarding Lead:**

Ms Carolyn Yates

Email: cyates@canburyschool.co.uk

Phone number: 020 8549 8622

**Deputy Safeguarding Lead:**

Ms Louise Boggi

Email: lboggi@canburyschool.co.uk

Phone number: 020 8549 8622

**The nominated Local Governing Body member with oversight of safeguarding issues**

Mandy Beck

Email: safeguardinggovernor@canburyschool.co.uk

**Local Authority Safeguarding Boards**

Kingston and Richmond Safeguarding Children Partnership is Canbury School’s Local Safeguarding Children’s Board. It provides emergency duty social services for children, young people and their families jointly with neighbouring London boroughs.

**Kingston Single Point of Access (SPA)**

Phone: 020 8547 5008 (Monday to Thursday, 8.45am-5.00pm, Friday 8.45am-4.45pm)

Out of hours emergency - Duty Team Telephone number: 020 8770 5000

Email: SPA@rbk.kingston.gov.uk

**LADO (Local Authority Designated Officer)** is Amanda Burrows

Direct Line: 07774 332675 / 0208 891 7370

LADO@achievingforchildren.org.uk

The LADO provides advice and presides over the investigation of any allegation or suspicion of

abuse directed against anyone working in the school.

However, if you are seriously concerned about a child's immediate safety, always dial 999.

Full local procedures on what to do if you have a concern are available at

<http://www.kingston.gov.uk/info/200235/safeguarding_children>

**Child Sexual Exploitation (CSE) officer** for Kingston Police:

Gregory Day | Police Constable 119VK | Met 713571

Telephone 02032763571

Email: VK-PPD@met.pnn.police.uk

Address: MASH,

Guildhall 2,

The High St,

Kingston Upon Thames,

Surrey

KT1 1EU

PREVENT lead Kingston - Stephanie.royston-mitchell@kingston.gov.uk

PREVENT Team - prevent@kingston.gov.uk

**Kingston Schools Liaison Officer**

PC Amy Gillett

Email: Amy.Yorke-Goldney@met.police.uk

Mobile: 07584 006990

The following links provide information about safeguarding:

* [www.childline.org.uk](http://www.childline.org.uk) - Childline is the free helpline for children and young people in the UK. Children and young people can call 0800 1111 to talk about any problem
* [www.education.gov.uk](http://www.education.gov.uk) - Department for Education
* [www.nspcc.org.uk](http://www.nspcc.org.uk) - The NSPCC (National Society for the Prevention of Cruelty to Children) is the UK's leading charity specialising in child protection and the prevention of cruelty to children.
* [www.barnardos.org.uk](http://www.barnardos.org.uk) - Helps the most vulnerable children and young people transform their lives and fulfil their potential.

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

1. Anti-Bullying Policy (includes Cyberbullying and Child-on-child)

2. Prevent and Upholding British Values Policy

3. Special Educational Needs and Disabilities Policy

4. Health and Safety Policy

5. Equal Opportunities Policy

6. Student Behaviour, Sanctions and Rewards Policy

7. Whistle-blowing Policy

8. Safer Recruitment Policy

9. Acceptable Use of ICT Policy (includes taking and storing images)

10. Educational Visits Policy

11. Social Media Policy

12. Staff Code of Conduct

13. Mental Health Procedures

14. Looked after child Policy

15. Suicide Procedure

16. Children missing education Policy

**3 Roles and responsibilities**

### 3.1 Designated Safeguarding Lead in School

The Designated Safeguarding Lead (DSL), Philippa Rich, has overall responsibility for the implementation of procedures and liaison with Children’s Social Care Services and other agencies on behalf of the School, in consultation with the Headmistress of Canbury School.

During term time the Designated Safeguarding Lead (or a Deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns, whether that is face-to-face or by phone.

The role of the DSL and the key activities undertaken by DSL forms part of the Job Description of Philippa Rich (Deputy Head Pastoral).

The Designated Safeguarding Lead:

* Holds ultimate responsibility for safeguarding and child protection in Canbury school. This responsibility will not be delegated.
* Acts as a source of support and expertise for the whole school community in regards to our safeguarding duties.
* Encourages a culture of listening to children and taking account of their wishes and feelings.
* Undertakes multi-agency (Level 3) safeguarding training with updates every two years and will refresh their knowledge and skills at regular intervals but at least annually.
* Will refer a child if there are concerns about possible abuse, to Achieving for Children’s Single Point of Access (SPA) and/or the local authority where the child resides and act as a focal point for staff to discuss concerns.
* Will keep detailed, accurate records, either written or using appropriate online software, of all concerns about a child even if there is no need to make an immediate referral.
* Will ensure that records include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, decisions reached and the outcome.
* Will ensure that all such records are kept confidential, stored securely and are separate from the student’s general file.
* Will ensure that an indication of the existence of the additional safeguarding and child protection file is marked on the student general file.
* Will ensure that a copy of the safeguarding and child protection file is retained until such a time that the new school acknowledges receipt of the original file. The copy will then be shredded.
* Will liaise with the local authority and work with other agencies and professionals in line with Working Together to Safeguard Children.
* Has a working knowledge of Kingston and Richmond Safeguarding Children Partnership and Achieving for Children procedures. Will ensure that either they, or an appropriate staff member, attend case conferences, core groups, or other multi-agency planning meetings, contribute to assessments and provide a report, where required, which has been shared with the parents and child (depending on age and understanding).
* Notifies Children’s Social Care if a child subject to a child protection plan is absent from school without explanation.
* Will ensure that all staff sign to say they have read, understood and agree to work within Canbury School’s safeguarding policy, staff code of conduct and Keeping Children Safe in Education, September 2021 Part 1 and Annex A (the latter a condensed version of Part 1 for staff who do not work directly with children) and ensure that the policies are used appropriately.
* Will organise child protection and safeguarding induction, regularly updated training and a minimum of annual updates (including online safety) for all school staff, keep a record of attendance and address any absences.
* Will undertake with the headteacher and Governing Board, an annual audit of Canbury school’s safeguarding policies, procedures and practices and ensure that this is submitted to Kingston and Richmond Safeguarding Children Partnership.
* Has an understanding of locally agreed processes for providing early help and intervention and will support members of staff where Early Help is appropriate.
* can recognise the additional risks that children with SEN and disabilities (SEND) or certain health conditions can face online, for example, from online bullying, grooming and radicalisation.
* Will ensure that the name of the designated safeguarding lead and deputies, are clearly advertised in the school and on the website, with a statement explaining the school’s role in referring and monitoring cases of suspected abuse.
* Will ensure that they, or a deputy, are available during term time school hours for staff to discuss any safeguarding concerns.
* Will ensure that there are adequate and appropriate cover arrangements for any out of hours or out of term activities.
* is able to understand the unique risks associated with online safety and must ensure that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school,
* refers cases of suspected abuse to children’s social care or police as appropriate, making contact with a welfare agency within 24 hours (in writing or with written confirmation of a telephone referral) of a disclosure or suspicion of abuse. In the case of serious harm, the Police are informed from the outset,
* undertakes Prevent awareness training,
* refer cases to the Channel programme where there is a radicalisation concern as required,
* refer cases where a crime may have been committed to the police as required,
* liaise with the headmistress to inform her of issues, especially ongoing enquiries under section 47 of the Children’s act 1989 and police investigations,
* reports to the appropriate authorities any child who is missing from school without reasonable explanation from parents/guardians/carers,
* is the lead person for looked after children and in this role ensures that staff have the information they need in relation to a child’s looked after legal status and contact arrangements with birth parents or those with parental responsibly,
* should have details of any looked after child’s social worker and the name of the virtual school head in the authority that looks after the child,
* will help to promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and leadership staff,
* ensures that when a student with a child protection plan leaves Canbury School his or her information is passed to his or her new school and the student’s social worker informed,
* attends and/or contribute to child protection conferences,
* coordinate as appropriate, School’s contribution to child protection plans,
* develop effective links with relevant statutory and voluntary agencies,
* ensures that the Child Safeguarding Policy is reviewed annually, and by the School’s Governing Body as detailed in the Minutes, unless an incident or new legislation or guidance suggests the need for an interim review. The DSL has overall responsibility for such review and update,
* be responsible for ensuring that the Safeguarding Policy is published to parents and prospective parents through being available on an unrestricted part of the School’s website and on request, free of charge, from the School office in paper format via post or in electronic format via e-mail,
* ensures that the PSHE, form tutor and assembly programmes include teaching to help all students respond positively to the rights of children to be safe and to know how to protect themselves and others,
* ensures that the PSHE and Wellbeing curriculum covers relevant issues in the Relationships Education and Relationships and Sex education programme,
* discusses (in liaison with the Headmistress) concerns with the SPA, prior to making any referral,
* obtains informal advice from the SPA concerning borderline cases,

If the DSL or Headmistress is unsure whether to make a formal referral, the SPA should be contacted and advice should be sought on a ‘no names basis’ without identifying the family. If SPA advises a referral, the referral should be made in writing or with written confirmation of a telephone referral.

### 3.2 The Deputy DSLs

Ms Carolyn Yates and Ms Louise Boggi are both appropriately trained to Advanced Child Safeguarding Level 3 which is updated every 2 years as set out in the KCSiE document and in accordance with Kingston and Richmond Safeguarding Children Partnership. In the short-term or long-term absence of the DSL, they will assume all the functions defined in 3.1. to ensure the ongoing safety and protection of all students.

### 3.3 The Headmistress:

* ensures that the Safeguarding Policy and Procedures, are implemented and followed by all Canbury School staff,
* allocates sufficient time and resources to enable the Designated Safeguarding Lead to carry out the roles effectively, including the assessment of students and attendance at strategy discussions and other necessary meetings,
* ensures that all Canbury School staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures,
* reports to the Disclosure and Barring Service within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because s/he is considered unsuitable to work with children. Failure to do so constitutes an offence and may result in the school being removed from the DfE register of independent schools,
* ensures that ‘settlement agreements’ are never agreed in connection with Safeguarding Policy issues,
* liaises and informs DBS, Ofsted and/or DfE of incidents as appropriate,
* liaises with the Bursar, to ensure that safe recruitment practices are followed by checking the suitability of staff and others working with our children. All employees have enhanced DBS checks and Prohibition Checks,
* in liaison with the Bursar, who is responsible for maintaining and updating the School’s Single Central Record relating to Safer Recruitment and appointments.

### 3.4 All Canbury School Staff, Supply Staff and Volunteers

To meet and maintain our safeguarding responsibilities towards Canbury School students, all members of staff and those who come into contact with our students including volunteer and temporary staff are expected to adhere to the following good practice, which includes:

* treating all students with respect,
* setting a good example by conducting themselves appropriately,
* involving students in decisions that affect them, primarily through School Council,
* encouraging positive and safe behaviour among students,
* being a good listener,
* making themselves familiar with the School’s Safeguarding Policy and other documents relating to wider safeguarding issues, such as the ‘Student Behaviour Sanctions and Rewards Policy’ and the ‘Anti-Bullying Policy (including cyberbullying, prejudice-based and discriminatory bullying)’
* knowing the names of the Designated Leads at the school and their role,
* being alert to the signs of abuse as detailed in of this document,
* reporting any concerns immediately to the DSL,
* consulting with the DSL if in any doubt as to how to proceed,
* be prepared to identify children who may benefit from early help (meaning by providing support as soon as a problem emerges at any point in a child’s life). Early help requirements should be discussed with the DSL. Staff may be required to support other agencies and professionals in an early help assessment,
* being clear on the process for making referrals to children’s social care and for statutory assessments under the Children Act 1989, especially section 17(children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments,
* knowing what to do if a child tells them he/she is being abused, exploited or neglected. Staff should know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead and children’s social care. Staff should never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child,
* be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence,
* raising concerns about poor or unsafe practice with the DSL, ensuring such concerns are addressed sensitively and effectively, following the advice given in this document in relation to how to handle disclosures,
* reading and understanding the Canbury School Staff Code of Conduct provides guidance to staff to ensure that their behaviour and actions do not place students or themselves at risk of allegations of harm to students (for example, in one to one tuition, sports coaching, engaging in inappropriate electronic communication with a student, delivering Relationships & Sex Education etc.). This is issued to all staff at the start of each academic year,
* participating in the organised training in child protection on appointment and be updated at frequent intervals (for example, via email, e-bulletins and staff meetings),
* being alert to changes in students’ behaviour and recognising that challenging behaviour may be an indicator of abuse,
* asking the student’s permission before doing anything for them of a physical nature such as assisting with dressing, physical support during PE or administering first aid (unless the nature of the student’s injuries means that such permission can not be obtained, or if physical restraint is necessary despite lack of consent),
* maintaining appropriate standards of conversation and interaction with and between students and avoiding the use of sexualised or derogatory language,
* being aware that the personal and family circumstances and lifestyles of some students lead to an increased risk of abuse,
* knowing the Safeguarding response to children who go missing from education
* understanding that inappropriate behaviour towards students is unacceptable and that their conduct towards students must be beyond reproach.

Note: under the Sexual Offences Act 2003, it is an offence for a person over the age of 18

and in a position of trust, to have a sexual relationship with a person under the age of 18,

even if the relationship is consensual. This means that any sexual activity between a

member of the school staff and a student under 18 may be a criminal offence, even if that student is over the age of consent.

All staff must be aware of their duty to raise concerns, where they exist, about Child

Protection (Safeguarding) and this may include the attitude or actions of colleagues. Any staff member who has a concern about a child’s welfare should follow the referral process set out in section 8.

We recognise that children cannot be expected to raise concerns in an environment where staff

fail to do so. If any member of staff is dissatisfied with the way that a DSL has dealt with his or her concern over the welfare of a student he or she may contact the Headmistress or the nominated Governor (Ms Mandy Beck) with oversight for safeguarding issues.

Volunteer and supply staff are made aware of all matters relating to safeguarding. Every adult with responsibility for the care and welfare of children at Canbury School is appropriately checked and vetted under the criteria of Safeguarding Children and Safer Recruitment.

Induction and training on safeguarding is provided for all full-time, part-time and volunteer staff as part of the annual programme of INSET and bespoke sessions. This training will always include online safety within its content.

### 3.5 The Governing Board

The Governing Board of Canbury School understands and fulfils its responsibilities, namely to ensure that:

* there are appropriate policies and procedures in place in order for appropriate action to be taken in a timely manner to safeguard and promote children’s welfare (these would include the child protection, online safety, behaviour, staff code of conduct and SEND policies)
* child protection, safeguarding, recruitment and managing allegations policies and procedures, including the staff code of conduct, are consistent with Kingston’s and Richmond’s Safeguarding Children’s Board and statutory requirements.
* that policies and procedures are reviewed annually (as a minimum) and updated if needed, so that they is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt
* the Safeguarding policy is publicly available on the school website
* all staff, including temporary staff and volunteers read and understand Canbury School’s Safeguarding policy and Staff Code of Conduct
* all staff have read and understood Keeping Children Safe in Education (September 2021) part 1 and Annex A (the latter a condensed version of Part 1 for staff who do not work directly with children) and that mechanisms are in place to assist staff in understanding and discharging their roles and responsibilities as set out in the guidance
* all governors have read part 2 of KCSiE as a minimum, but must also aware they’re responsible for compliance in Parts 3,4,5
* the Designated governor for Safeguarding has read the whole of the KCSiE guidance
* the school operates a safer recruitment procedure that includes statutory checks on staff suitability to work with children (and disqualification by association regulations where applicable) and by ensuring that there is at least one person on every recruitment panel who has completed safer recruitment training
* Canbury School has procedures for dealing with allegations of abuse against staff (including the headteacher), volunteers and against other children and a referral is made to the DBS if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have had they not resigned. The school must also consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).
* the Governing Board has a nominated governor responsible for safeguarding who has undertaken appropriate training for the role. The chair of governors is responsible in the event of an allegation of abuse made against the headteacher
* an annual audit of Canbury School’s safeguarding policies, procedures and practices is undertaken with the Headteacher and designated safeguarding lead (DSL) and that this is submitted to Kingston and Richmond Safeguarding Children Partnership
* a member of the senior leadership team has been appointed as the designated safeguarding lead and they will take lead responsibility for safeguarding and child protection; the role is explicit in the role holder’s job description
* DSL and their deputies undertake multi-agency (Level 3) safeguarding training which is updated every two years
* there is a designated teacher to promote the educational achievement of children looked after who are on the school roll
* all other staff have safeguarding training updated in-house termly and via the KRSCP every three years
* at least one member of the Governing Board has completed safer recruitment training to be repeated every five years
* children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and through relationship and sex education (RSE)
* they recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed
* appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future
* appropriate online filtering and monitoring systems are in place for all onsite ICT and student Chromebooks
* enhanced Disclosure and Barring Service (DBS) checks (without barred list checks, unless the governor is also a volunteer at the school) are in place for all governors.

**4. Confidentiality**

For full details on Canbury School’s approach to confidentiality and data protection please see the separate Privacy Notice Policies.

In relation to safeguarding please note:

* Timely information sharing is essential to effective safeguarding
* Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
* The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
* If staff need to share ‘special category personal data’, the DPA 2018 contains ‘safeguarding of children and individuals at risk’ as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
* Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child’s best interests
* The government’s [information sharing advice for safeguarding practitioners](https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice) includes 7 ‘golden rules’ for sharing information, and will support staff who have to make decisions about sharing information
* If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
* Confidentiality is also addressed in this policy with respect to record-keeping in section 3.1 The role of the DSL, and allegations of abuse against staff in section 6.3b

**5 Definitions and Terminology**

The definition of a **child** is that of the Children Act 1989: a boy or girl under the age of 18.

The definition of **abuse** is: 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. They may be abused in a family or in an institutional or community setting by those known to them, or more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

**Safeguarding** and promoting the welfare of children is defined for the purposes of this guidance as:

* protecting children from maltreatment;
* preventing impairment of children’s mental or physical health or development;
* ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and
* taking action to enable all children to have the best outcomes.

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

**Development** means physical, intellectual, emotional, social or behavioural development.

**Staff** refers to all those working for or on behalf of Canbury School full-time, part-time and regular visiting staff, in a paid or voluntary capacity.

**Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.

**6 Equalities**

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children’s diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. Accordingly, we do not discriminate against students or staff on the basis of age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race, colour, nationality, ethnic or national origin, religion or belief, sex or sexual orientation (**Protected Characteristics)**. Discriminatory and derogatory language is not tolerated.

We give special consideration to children who:

* have special educational needs (SEN) or disabilities (see section 12)
* are young carers
* may experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
* have English as an additional language
* are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
* are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
* are asylum seekers
* are at risk due to either their own or a family member’s mental health needs
* are looked after or previously looked after (see section 15).

**7 What is child abuse and neglect?**

All staff should be aware of indicators of abuse and neglect and that 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 therefore staff should always be vigilant and always raise any concerns with the designated safeguarding lead (or deputy).

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. 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. They may be abused by an adult or adults or by another child or children. Neglect would be carried out by a parent or carer.

Technology is a significant component in many safeguarding and wellbeing issues. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children can abuse their peers 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.

Knowing what to look for is vital for the early identification of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation so that you are able to identify cases of children who may be in need of help or protection.

### 7a Physical Abuse

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

Female genital mutilation (FGM) is included in this category of abuse.

Signs of Physical Abuse

1. Unexplained injuries or burns, particularly if they are recurrent;
2. Improbable excuses given to explain injuries;
3. Refusal to discuss injuries;
4. Admission of punishment which appears excessive;
5. Bald patches;
6. Withdrawal from physical contact;
7. Arms and legs kept covered in hot weather;
8. Fear of returning home;
9. Fear of medical help;
10. Self-destructive tendencies;
11. Aggression towards others;
12. Running away
13. In the case of FGM belonging to a culture or going on holiday to a country where this practise is common. Unexplained absence from school. Female relatives visiting from the country of origin.
14. Unexplained delay in seeking treatment;
15. The parents/carers are uninterested or undisturbed by an accident or injury.

### 7b Emotional Abuse

Emotional abuse is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or ‘making fun’ of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child’s developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child 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.

Signs of Emotional Abuse

1. Physical, mental and emotional development lags;

2. Admission of punishment which appears excessive;

3. Over-reaction to mistakes;

4 Continual self-deprecation;

5 Sudden speech disorders;

6. Fear of new situations;

7. Inappropriate emotional responses to painful situations;

8. Neurotic behaviour, rocking, hair-twisting, thumb-sucking;

9. Self-mutilation;

10. Fear of parents being contacted;

11 Extremes of passivity or aggression;

12 Drug/solvent abuse;

13. Running away;

14 Compulsive stealing and scavenging;

15. Scape-goated within the family;

16. Withdrawn or seen as a “loner” – difficulty relating to others.

### 7c Sexual Abuse

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 in education.

Signs of Sexual Abuse

1. Sudden changes in behaviour or school performance;
2. Displays of affection in a sexual way inappropriate to age;
3. Tendency to cling or need constant reassurance;
4. Tendency to cry easily;
5. Regression to younger behaviour, such as thumb-sucking, playing with discarded toys, acting like a baby;
6. Complaints of genital itching or pain;
7. Distrust of a familiar adult, or anxiety about being left with a relative, a baby-sitter or lodger;
8. Unexplained gifts or money;
9. Depression and withdrawal;
10. Self-harm (including eating disorder), self mutilation and suicide attempts;
11. Involvement in prostitution or indiscriminate choice of sexual partners;
12. An anxious unwillingness to remove clothes e.g. for sports events (but this may be related to cultural norms or physical difficulties)

### 7d Neglect

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

Signs of Neglect

1. Constant hunger;

2. Poor personal hygiene;

3. Constant tiredness;

4. Poor state of clothing;

5. Emaciation;

6. Frequent lateness or non-attendance at school;

7. Untreated medical problems;

8. Destructive tendencies;

9. Low self-esteem;

10. Neurotic behaviour;

11. Poor social interaction;

12. Running away;

13. Compulsive stealing or scavenging;

14. Child thrives away from home environment;

15. Child left with adults who are intoxicated or violent;

15. Child abandoned or left alone for excessive periods.

Staff are required to read the DfE’s ‘What to do if you are worried a child is being abused – advice for practitioners on induction to the school’.

If staff are unsure in the identification of abuse and neglect, then they should always speak to the DSL.

**For further details on specific safeguarding issues please refer to Appendix I**

**8 Recognising abuse and taking action**

All staff are required to follow the procedures to protect the students, staff and the School, to

ensure consistency and avoid delays. They must not think that by voicing concern they are

necessarily starting procedures. The criteria should be that they have **‘reasonable suspicion’**

and under the Children Act, 1989, this definition has been extended to include **‘or may suffer**

**in the future’**. If staff have any concerns about a child’s welfare, they should act on them immediately.

### 8a What should staff do if they have a concern about a child

If staff have any concerns about a child (as opposed to a child being in immediate danger – see section 8c) they need to decide what action to take. Where possible, there should be a conversation with the DSL as soon as possible to agree a course of action, although any member of staff can make a referral to children’s social care. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare of children.

Options could then include:

* + managing any support for the child internally via Canbury’s own pastoral support processes;
	+ an early help assessment
	+ referral to specialist services and should be made in accordance with the referral threshold set by the Local Safeguarding Children’s Board.

If, in exceptional circumstances the Designated Safeguarding Lead (or Deputy) is not available, this should not delay appropriate action being taken. Staff should consider speaking to a member of the senior leadership team and/or take advice from local children’s social care. In these circumstances, any action taken should be shared with the Designated Safeguarding Lead (or Deputy) as soon as is practically possible.

The local authority should decide within one working day of a referral being made about what course of action they are taking and should let the referrer know the outcome. Staff should follow up on a referral if the information is not forthcoming.

If after a referral the child’s situation does not appear to be improving the DSL (or person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child’s situation improves.

If early help is appropriate the DSL should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate. If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children’s social care if the child’s situation does not appear to be improving.

If a staff member, in the course of their work, discovers an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the staff member **must** report this to the police. See section 5.3 for further details.

See appendix B for a flowchart on the actions to take where there are concerns about a child.

School staff should ensure the child’s wishes and feelings are taken into account when determining what action to take and what services to provide.

### 8b Early Help

**Any** child may benefit from early help, but all staff should be particularly alert to the potential need for early help for a child who:

* 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);

* 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;
* is misusing drugs or alcohol themselves;
* is at risk of modern slavery, trafficking sexual or criminal exploitation;
* has a family member in prison, or is affected by parental offending;
* is in a family circumstance presenting challenges for the child, such as substance abuse, adult mental health problems or domestic abuse;
* has returned home to their family from care;
* is showing early signs of abuse and/or neglect;
* is a privately fostered child
* is at risk of ‘honour’-based abuse such as Female Genital Mutilation or Forced Marriage
* is persistently absent from education, including persistent absences for part of the school day.

If early help is appropriate, the Designated Safeguarding Lead (or Deputy) will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. But all staff should be aware of the early help process and understand their role in it. This includes identifying emerging problems, liaising with the DSL, sharing information with other professionals to support early identification and assessment and, in some cases, acting as the lead professional in undertaking an early help assessment.

Details of Kingston and Richmond Safeguarding Children Partnership early help assessment and Multi-agency Threshold can be found at:

<http://kingstonandrichmondlscb.org.uk/practitioners/early-help-assessment-178.php>

### 8c What should staff do if a child is in danger or at risk of harm

If a child is in immediate danger or is at risk of harm a referral should be made to children’s social care (SPA) and/or the Police immediately. Anyone can make a referral. Where referrals are not made by the DSL the DSL should be informed, as soon as possible, that a referral has been made. The SPA number for Kingston can be found at the start of this document. Other local council SPA numbers can be found on the internet.

### 8d Action where a child has serious injuries which require immediate treatment

If, within the context of these guidelines, a child has injuries which require immediate treatment, the DSL / Headmistress should arrange for the child to be taken to the casualty department of the nearest hospital. They should inform the hospital that child abuse is suspected. The DSL/Headmistress must also arrange for the parents, or those with parental responsibility, to be informed as soon as possible that the child has been taken to hospital.

### 8e Action if you have concerns about extremism

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

If, in exceptional circumstances, the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children’s social care. Make a referral to local authority children’s social care directly, if appropriate. Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](https://www.gov.uk/government/publications/channel-guidance), the government’s programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children’s social care team.

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

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

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

For further details on Extremism see the **Prevent And Upholding British Values Policy.**

### 8f If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 8a.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

For further details on Mental Health see the **Mental Health Procedures** document

### 8g Actions if you have concerns around Female Genital Mutilation (FGM)

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. FGM is illegal in England and Wales under the FGM Act (2003). It is a form of child abuse and violence against women with long lasting harmful consequences. It is also known as ‘female genital cutting, ‘circumcision’ or ‘initiation’.

If a **teacher**, in the course of their work, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the **teacher** must immediately report this to the police. This is a statutory duty, and staff will face disciplinary sanctions for failing to meet it. It will be rare for teachers to see visual evidence, and you should NOT be examining students.

Unless they have been specifically told not to disclose by the Police, they should also discuss the case with the DSL and involve children’s social care as appropriate.

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

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

**Any member of staff** who suspects a student is *at risk* of FGM or suspects that FGM has been carried out or discovers that a student **aged 18 or over** appears to have been a victim of FGM must speak to the DSL and follow our safeguarding procedures.

### 8h If you suspect or become aware of an allegation of abuse sexual violence or sexual harassment (including peer on peer/child on child abuse)

Staff at Canbury School recognise that children are capable of abusing their peers and that such abuse can manifest itself in many ways.

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported throughout the process and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. The experience may adversely affect their educational attainment. 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.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support, reassured that they are being taken seriously and that every effort is made to ensure their education is not disrupted. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. It is also important that other children, adult students and school and college staff are supported and protected as appropriate.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Most cases of students hurting other students will be dealt with under our school’s behaviour policy, but this child safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

* Is serious, and potentially a criminal offence
* Is made against an older student and refers to their behaviour towards a younger student or a more vulnerable student
* Could put students in the school at risk
* Is violent
* Involves students being forced to use drugs or alcohol
* Indicates that other students may have been affected by this student
* Indicates that young people outside the school may be affected by this student
* Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including sexting)

The school may decide that the children involved do not require statutory interventions but may benefit from early help. An assessment will be carried out and submitted to the relevant agency in such cases.

**Responding to a report**

It is important to note that children may not find it easy to tell staff about their abuse verbally. Children can show signs or act in ways that they hope adults will notice and react to. In some cases, the victim may not make a direct report. For example, a friend may make a report or a member of school or staff may overhear a conversation that suggests a child has been harmed or a child’s own behaviour might indicate that something is wrong. **If staff have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told.**

Reports of sexual violence are often complex and require difficult decisions to be made. Decisions would be made on a case-by-case basis, in consultation with the DSL, the Headmistress and our local Safeguarding Partnership (KRSCP). Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity, the age of consent is 16; sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

The starting point regarding any report should always be that there is a zero tolerance approach to sexual violence and sexual harassment and it is never acceptable and it will not be tolerated. It is especially important not to pass off any sexual violence or sexual harassment as “banter”, “just having a laugh”, “part of growing up” or “boys being boys” as this can lead to a culture of unacceptable behaviours and an unsafe environment for children.

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

* listening carefully to the child, reflecting back, using the child’s language, being non-judgmental, being clear about boundaries and how the report will be progressed, not asking leading questions and only prompting the child where necessary with open questions – where, when, what, etc. It is important to note that whilst leading questions should be avoided, staff can ask children if they have been harmed and what the nature of that harm was
* wait until the end of the report and immediately write up a thorough summary. This allows you to devote your full attention to the child and to listen to what they are saying. It may be appropriate to make notes during the report (especially if a second member of staff is present). However, if making notes, you should be conscious of the need to remain engaged with the child and not appear distracted by the note taking. Either way, **it is essential a written record is made**
* Do not promise confidentiality, it is very likely a concern will have to be shared further (for example, with the designated safeguarding lead or children’s social care) to discuss next steps

Staff should only share the report with those people who are necessary in order to progress it.

* Understand that anonymity is preserved in cases where an allegation is progressing through the criminal justice system;
* It is important that the victim understands what the next steps will be and who the report will be passed to
* Pass on the concern as soon as possible to the concerns are discussed with the DSL (deputy) and the Headmistress;
* understand that where an incident between takes place away from the school, the School’s duties remain the same;
* if a child has been harmed or is in immediate danger or at risk of harm, a referral will be made to children’s social care or the police;
* where a crime may have been committed, the police are involved e.g. in cases where there is a report of rape, assault by penetration or sexual assault;
* The DSL will put a risk assessment (see below for further details) and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and all the other children (and, if appropriate, adult students and staff) at the school especially any actions that are appropriate to protect them) with a named person they can talk to if needed.
* while the facts are being established, the alleged perpetrator is removed from any classes shared with the victim and kept a reasonable distance apart in the best interests of both children;
* Careful consideration is given to when to inform the alleged perpetrator, and this is discussed with relevant agencies.
* See also section on Procedures for dealing with all disclosures, in this document.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children’s social care and the police as required. Decisions and actions are regularly reviewed and that relevant policies are updated to reflect lessons learnt

**Action following a report of sexual violence and/or sexual harassment**

There are four likely routes to consider after a report of sexual violence or sexual harassment. In deciding which route to take, we would consider:

* the wishes of the victim in terms of how they want to proceed
* the nature of the alleged incident
* the ages of the children involved
* the developmental stages of the children involved
* any power imbalance between the children
* whether the incident a one-off or a sustained pattern of abuse
* any ongoing risks to the victim, other children, school or college staff
* contextual safeguarding issues
1. **Managing internally**: In some cases of sexual harassment (such as one-off incidents) a school may manage the incident internally.
2. **Early help**: This is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation.
3. **Referrals to children’s social care**: In cases where there has been harm, or there is an immediate risk, a referral should be made to children’s social care.
4. **Reporting to the police (in parallel to children’s social care):** In cases where rape, assault by penetration or sexual assault is reported. Schools should not wait for the outcome of a police investigation before protecting the victim, perpetrator and other children in the school. The DSL should work closely with the police to ensure that the school’s actions do not jeopardise the police investigation. If a child is convicted or cautioned, the school should update the risk assessment and consider suitable action through their behaviour policy.

It is important for the school to ensure the victim and perpetrator remain protected, especially from bullying or harassment. Staff need to be aware of the harm also caused by bullying and should use the School’s anti-bullying procedures where necessary. However, on occasions a student’s behaviour may warrant a response under Child Protection, rather than anti-bullying procedures. The management of children and young people with sexually harmful behaviour is complex and the Headmistress and DSL will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves and the Child Protection procedures will be followed for both victim and perpetrator.

Where no further action is taken, or a child found not guilty, the school should continue to support the victim and perpetrator.

Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.

Where neither children’s social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school’s usual disciplinary procedures.

**If a report is determined to be unsubstantiated, unfounded, false or malicious**

The designated safeguarding lead should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else 111 and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.

**If a report is shown to be deliberately invented or malicious**

The school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

**Risk Assessment**

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

* the victim, especially their protection and support
* whether there may have been other victims
* the alleged perpetrator(s)
* all the other children, (and, if appropriate, adult students and staff) at the school
* especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harms.

The risk assessments will be recorded (written or electronic) and will be kept under review.

It is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school’s

approach to supporting and protecting their pupils and students and updating their own

risk assessment.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both student’s files.

**Ongoing Support**

* 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
* Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape
* Be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).
* Access support from Children and Young People’s Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence.
* Access support from Child and adolescent mental health services (CAMHS)
* Access support from t Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
* It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs.
* Be aware that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. Avoid any action that would have the effect of isolating the victim, in particular from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. Provide space for victims to withdraw.
* Consider and maintain arrangements to potentially protect and support the victim for a long time
* The school will ensure that the DSL knows how and where to seek supports should they need it
* If a victim requests a move to another school this request should be considered and supported (and following discussion with their parents or carers)
* If a move to another educational institution happens (for any reason), that the new educational institution is made aware of any ongoing support needs. The designated safeguarding lead should take responsibility to ensure this happens.

### 8i Action around sharing nudes or semi-nudes (Sexting)

Advice taken from ‘[Sharing nudes and semi-nudes: advice for education settings working with children and young people](https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people), December 2020

Although most children and young people aren’t creating or sharing these types of images and videos, the potential risks are significant. If the imagery is shared further, it may lead to embarrassment, bullying and increased vulnerability to blackmail and exploitation.

Producing and sharing nudes and semi-nudes of under 18s is illegal, which causes considerable concern to staff, children and young people, and amongst parents and carers.

Although the production of such images will likely take place outside of school, sharing can take place and issues are often identified or reported here. Schools need to be able to respond swiftly and confidently to make sure children and young people are safeguarded, supported and educated.

The types of incidents which this advice covers are:

* a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18
* a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18
* a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18

This advice does not cover:

* the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency
* children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images.

**Your responsibilities when responding to an incident**

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

You must:

* Never view, copy, print, share, store or save the imagery yourself, or ask a student to share or download it. If you have already viewed the images or video by accident, you must report this to the DSL/ local police for advice and to explain the circumstances
* Not delete the image or video or ask the student to delete it
* Not ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
* Not share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
* Not say or do anything to blame or shame any young people involved

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

If a decision is made to view imagery, the DSL (or equivalent) would need to be satisfied that viewing:

* is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved
* is necessary to report it to a website, app or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report
* is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting’s device or network

If it is necessary to view the imagery then the DSL (or equivalent) should:

* discuss the decision with the headteacher or a member of the senior leadership team
* make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team
* make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
* wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher or a member of the senior leadership team’s office
* make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images
* record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.
* if any devices need to be taken and passed onto the police, the device(s) should be confiscated and the police should be called. The device should be disconnected from Wi-Fi and data, and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

Further details on searching, deleting and confiscating devices can be found in the DfE’s [Searching, screening and confiscation advice](https://www.gov.uk/government/publications/searching-screening-and-confiscation)

Any direct disclosure by a child or young person should be taken seriously. A child or young person who discloses they are the subject of an incident of sharing nudes and semi-nudes is likely to be embarrassed and worried about the consequences. It is likely that disclosure in the education setting is a last resort and they may have already tried to resolve the issue themselves.

When a disclosure is made, the member (or members) of staff should ensure the child is feeling comfortable and appropriate and sensitive questions are asked, in order to minimise further distress or trauma to them.

When discussing the sharing of nudes and semi-nudes, it is important that the DSL (or equivalent)/member of staff:

* reassures the child or young person that they are not alone, and the education setting will do everything that they can to help and support them. They should also be reassured that they will be kept informed throughout the process
* recognises the pressures that children and young people can be under to take part in sharing an image and, if relevant, supports their parents and carers to understand the wider issues and motivations around this
* remains solution-focused and avoids any victim-blaming questions such as ‘why have you done this?’ as this may prevent the child or young person from talking about what has happened. For example, use questions such as ‘describe what happened’ or ‘explain to me who was involved’
* helps the child or young person to understand what has happened by discussing the wider pressures that they may face and the motivations of the person that sent on the image(s)
* discusses issues of consent and trust within healthy relationships. Explain that it is not ok for someone to make them feel uncomfortable, to pressure them into doing things that they do not want to do, or to show them things that they are unhappy about. Let them know that they can speak to the DSL or equivalent if this ever happens
* explains the law on the sharing of nudes and semi-nudes. It is important to highlight that the law is in place to protect children and young people rather than criminalise them and should be explained in such a way that avoids alarming or distressing them
* signposts to the IWF and [Childline’s Report Remove tool](https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.

**Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

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

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

* The incident involves an adult
* There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
* What the DSL knows about the images or video suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent
* The images or video involves sexual acts and any student in the imagery is under 13
* The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of the images or video (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children’s social care. The decision will be made and recorded in line with the procedures set out in this policy.

**Further review by the DSL**

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

They will hold interviews with the students involved (if appropriate) to establish the facts and assess the risks.

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

**Informing parents**

Parents and carers should be informed by the DSL at an early stage and involved in the process in order to best support the child or young person unless there is good reason to believe that involving them would put the child or young person at risk of harm. Any decision not to inform the parents or carers should be made in conjunction with other services such as children’s social care and/or the police, who would take the lead in deciding when they should be informed.

Where appropriate, DSLs (or equivalents) should support any child or young person involved with determining the best approach for informing parents and carers and allow them to be a part of this process if they want to be.

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through the Safer Schools Liaison Team.

**Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 4 of this policy also apply to recording incidents of sexting.

**Curriculum coverage**

Students are taught about the issues surrounding sexting as part of our relationships and sex education. Teaching covers the following in relation to sexting:

* What it is
* How it is most likely to be encountered
* The consequences of requesting, forwarding or providing such images, including when it is and is not abusive
* Issues of legality
* The risk of damage to people’s feelings and reputation

Students also learn the strategies and skills needed to manage:

* Specific requests or pressure to provide (or forward) such images
* The receipt of such images
* This section of the policy on sexting is also shared with students so they are aware of the processes the school will follow in the event of an incident.

**Support**

Once a school has assessed a child or young person as not at immediate risk, it may be necessary to have a conversation with them and decide the best course of action. If possible, the DSL (or equivalent) should carry out this this conversation.

However, if the child or young person feels more comfortable talking to a different member of staff, this should be facilitated where possible. It is important that the child or young person is given a sense of control over the reporting process. The DSL (or equivalent) should support the member of staff to make sure the conversation is handled appropriately and they feel confident in discussing the incident.

**Children and young people who have had their nudes or semi-nudes shared publicly should be:**

* reassured that they have done the right thing by speaking to an adult and that the School and other adults are there to help

advised:

* to delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves
* to use the IWF and [Childline’s Report Remove tool](https://www.childline.org.uk/info-advice/bullying-abuse-safety/online-mobile-safety/sexting/report-nude-image-online/). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture
* on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them
* to speak to the school if they are concerned about any bullying behaviour

**Children and young people who have been sent a nude or semi-nude should be:**

* reassured that they have done the right thing by speaking out and that the School and other adults are there to help
* asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited
* advised:
	+ on the importance of reporting it online if it has been shared
	+ to delete it from their devices and accounts
	+ on the importance of not sharing the image further
	+ if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

**Children and young people who have shared another child’s or young person’s nudes or semi-nudes should be** asked:

* whether they asked for the photo or were initially sent it without requesting
* who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers
* about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes
* advised on the law on the sharing of nudes and semi-nudes

### 8j What should staff do if they have concerns about another staff member, supply teacher or volunteer

If staff have safeguarding concerns, or an allegation is made about another member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, then:

* this should be referred to the Headmistress or, in the Headmistress absence, the Chair of the Governors;
* where there are concerns/allegations about the Headmistress this should be referred to the Chair of Governors;
* in the event of concerns/allegations about the headteacher this should be reported directly to the local authority designated officer(s) (LADOs).
* where there are concerns/allegations about the DSL the headmistress should be informed.

In addition, the DSL will be informed of all allegations that come to the Headmistresses attention, so that they can consult police and children’s social care as appropriate.

The Headteacher/chair of governors will then follow the procedures set out in appendix E, if appropriate.

### 8k What should staff do if they have concerns about the Headmistress?

Because of their daily contact with students in a variety of situations, Heads are particularly vulnerable to accusations of abuse. In rare instances, Heads have been found to have committed child abuse. As stated above allegations against the Headmistress must be reported directly to the Chair of the Governors and the LADO by the person receiving the allegation.

See appendix F for more details.

Staff may consider discussing any concerns with the DSL and may make any referral via them.

### 8l What should staff do if they have concerns about safeguarding practices within the school

All staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school’s safeguarding regime and that such concerns will be taken seriously by the SLT team.

The school’s whistleblowing procedures are in place for such concerns to be raised with the school’s SLT team. Staff on induction are given a copy of the school’s whistleblowing policy and it is referenced in safeguarding refreshers for all staff.

If a member of staff feels unable to raise an issue with the school or feels their concerns are not being addressed, other whistleblowing channels may be open to them, such as:

The NSPCC whistleblowing helpline – 0800 028 0285 (open from 8am to 8pm Monday to Friday and on email at help@nspcc.org.uk

**9 Disclosure**

If a student makes a disclosure to you it is always better to raise concerns which may not need action than to do nothing or to delay reporting.

1. It takes a lot of courage for a student to disclose a safeguarding conern. He or she may feel ashamed, particularly if the abuse is sexual, his or her abuser may have threatened what will happen if he or she tells, he or she may have lost all trust in adults, or he or she may believe, or have been told, that the abuse is his or her own fault.
2. If a student talks to you about any risks to their safety or wellbeing you need to let him or her know that you must pass the information on – you are not allowed to keep secrets. The point at which you do this is a matter for professional judgment. If you jump in immediately the student may think that you do not want to listen, if you leave it till the very end of the conversation, the student may feel that you have misled him or her into revealing more than he or she would have otherwise.
3. Remember, it is not the responsibility of the School to investigate suspected cases of abuse. It is, however, our responsibility to follow local safeguarding procedures and to recognise that a student telling you he or she has been abused may be the beginning of a legal process, as well as of a process of recovery for the child. Legal action against the perpetrator can be seriously damaged by any suggestion that the child’s account has in any way been influenced by the person whom he / she has told.
4. In all instances, individual members of staff must not themselves take any further action, although if a parent, guardian or other individual volunteers information of relevance to the incident this should be recorded and handed to the DSL at the School.

See appendix A for guidance on disclosure conversations.

These guidelines will be used in accordance with locally agreed inter-agency procedures. The school will develop and maintain links with appropriate external agencies. They will be contacted within 24 hours of a disclosure or suspicion of abuse.

**10 Action by the DSL**

The action to be taken will take in to account:

* the local inter-agency procedures of the Kingston and Richmond Safeguarding Children Partnership or other local Safeguarding Boards,
* the nature and seriousness of the suspicion or complaint. A complaint involving a serious criminal offence will always be referred to the relevant local authority’s safeguarding team or the police without further investigation by the school,
* the wishes of the student who has complained, provided that the student is of sufficient understanding and maturity and properly informed. However, there may be times when the situation is so serious that decisions may need to be taken, after all appropriate consultation, that override a student’s wishes,
* the wishes of the complainant’s parents, provided they have no interest which is in conflict with the student’s best interests and that they are properly informed. Again, it may be necessary, after all appropriate consultation, to override parental wishes in some circumstances. If the DSL is concerned that disclosing information to parents would put a child at risk, he or she will take further advice from the relevant professionals before making a decision to disclose,
* duties of confidentiality, so far as applicable, and
* the lawful rights and interests of the School community as a whole including its employees and its insurers.

**11 Contacting parents**

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

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

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

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

**12 Children with special educational needs and disabilities**

At Canbury School we have a number of students with special educational needs (SEN) and disabilities, and we must be aware that these students can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

* Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child’s disability without further exploration,
* being more prone to peer group isolation than other children or bullying (including prejudice-based bullying)
* Children with SEND or certain medical conditions can be disproportionally impacted by things like bullying without outwardly showing any signs,
* Communication barriers and difficulties managing or reporting these challenges.

We offer extra pastoral support for students with SEND. This may include:

* Emotional Literacy Support via an ELSA staff member
* Wellbeing lessons
* ASD specialist support
* 1:1 sessions with the trained behaviour analyst
* Group work
* Social skills sessions

**13 Use of ‘reasonable force’**

For further guidance on this please refer to Canbury School’s ‘Use of Reasonable Force and Physical Restraint procedure’.

**14 Students with a social worker**

Students may need a social worker due to safeguarding or welfare needs. We recognise that a child’s experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a students has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the student’s safety, welfare and educational outcomes. For example, it will inform decisions about:

* Responding to unauthorised absence or missing education where there are known safeguarding risks
* The provision of pastoral and/or academic support.

Contact details of social workers are kept by the DSL and the SENCO.

**15 Looked-after and previously looked-after children**

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

* Appropriate staff have relevant information about children’s looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
* The DSL has details of children’s social workers and relevant virtual school heads

We have appointed an appropriately trained teacher, Mrs G Branney, to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of the role, this staff member will:

* Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
* Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children.

**16 Training**

All new staff are inducted to the school and within this induction the safeguarding systems are explained to them and key policies (such as the school’s Child Safeguarding policy, E-Safety policy, Staff code of conduct, Student behaviour and rewards policy, Child missing education, Child missing education policy and KCSiE are provided to them).

Staff should reference the ‘Recruitment, Selection and Disclosures Policy and Procedure’ for further guidance on this area.

All staff are reminded about safeguarding and child protection (including online safety) and the school’s arrangements throughout the year, via email updates and staff meetings. Termly a safeguarding refresher is delivered via INSET to all staff.

The governing bodies should also have regard to the Teachers’ Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and requires teachers to have a clear understanding of the needs of all students.

* All staff are required to read Part 1 of KCSiE (or the condensed version of Part 1 for staff who do not work directly with children)
* All school leaders and staff who work directly with children must also read Annex A of KCSiE.
* All senior Leadership staffshould read Part 5
* The headteacher and all DSLs should read all of the KCSiE document
* The bursar team should read all of the KCSiE document but concentrate on parts 3 & 4 + annex F & G
* The ICT network staff should read annex C of KCSiE

All Staff receive appropriate training to equip them to carry out their responsibilities for child protection effectively. It is kept up to date by refresher training at 3 yearly intervals, in accordance with Kingston and Richmond Safeguarding Children Partnership.

The Designated Safeguarding Lead and Deputy receives Advanced Child Safeguarding training, Level 3 (updated every 2 years) as set out KCSiE and in accordance with the Kingston and Richmond Safeguarding Children Partnership.

All staff receive Level 1 and Level 2 training on Child Safeguarding every three years, in accordance with Kingston and Richmond Safeguarding Children Partnership.

Safeguarding training is revisited on the first INSET day of each academic year.

**17 Complaints and concerns about school safeguarding policies**

**13.1 Complaints against staff**

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

**13.2 Other complaints**

Please see our ‘Complaints Policy and Procedure’ for further details.

**18 Whistle-blowing**

Please see our ‘Whistleblowing Policy’ for further details.

**19 Record keeping**

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

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

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

Safeguarding records relating to individual children will be retained for a for 25 years from the child's date of birth.

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

All files will be transferred separately from the main student file, ensuring secure transit, and confirmation of receipt will be asked for.

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The majority of the safeguarding evidence is stored electronically via MyConcern. Any paper-based documents are stored in a file separate from the students school file.

Only the DSL and Deputies have full access to the files and information on MyConcern. Key staff can be given limited access to safeguarding information on MyConcern on a case by case basis should the need arise.

If safeguarding information is required by outside agencies then this is tranfered electronically via a secure email site such as Egress.

In addition:

* The ‘Privacy Notice for Staff and prospective applicants for employment’ sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
* Appendix H sets out our policy on record-keeping with respect to allegations of abuse made against staff.

**20 Review and Monitoring**

1. The DSL will monitor the operation of this policy and its procedures.
2. The Governors will undertake an annual review of this policy and how their duties under it have been discharged.
3. The Governors will ensure that any deficiencies or weaknesses in regard to child protection arrangements are remedied without delay.

**Appendix A – Taking Action**

* In an emergency take the action necessary to help the child, such as, for example, calling 999.
* Report your concern to the DSL as soon as possible but certainly by the end of the day.
* Do not start your own investigation,
* share information on a need-to-know basis only – do not discuss the issue with colleagues, friends or family.
* Be prepared to complete a written record of disclosure. Any such record is to have the

following information:

- Date and time the student spoke to you, or date and time your suspicions were initiated

- Date, time, and place the alleged abuse took place

- Your name and name/s of anyone else present when the student spoke to you

- The name of the complainant and, where different, the name of the child who has

allegedly been abused

- A description of any injuries observed

**During your conversation with the student:**

* Allow the student to speak freely and lead the discussion, never stop a student who is freely recalling significant events and do not press for details by asking questions, e.g. “What did they do next?”.
* Remain calm and do not over react – the student may stop talking if he or she feels that he or she is upsetting you.
* Listen and be supportive - give reassuring nods or words of comfort e.g. ‘I’m so sorry this has happened’, ‘I want to help’, ‘This isn’t your fault’, ‘You are doing the right thing in talking to me’.
* Accept what the student says without challenge — reassure him or her that he or she is safe, that he / she is doing the right thing and that you recognise how hard it is for him / her.
* Do not admonish the student for not disclosing earlier. Saying ‘I do wish you had told me about this when it started’ or ‘I can’t believe what I’m hearing’ may be your way of being supportive but the student may interpret it that he / she has done something wrong.
* Do not be afraid of silences – remember how hard this must be for the student.
* Never ask investigative questions – don’t put words in the student’s mouth, or ask leading questions such as ‘How many times this has happened?’ ’Does it happen to siblings too?, or ’What does your mother think about all this?’.
* Don't investigate – but you may use questions such as, ‘Is there anything else you'd like to tell me?’,
* do not offer any physical touch as comfort - it may be anything but comforting to a child who has been abused.
* Do not lay blame or criticise either the student or the perpetrator.
* Do not promise complete confidentiality — although you can explain that he / she has done the right thing and tell him / her that you will only be passing this information on to the appropriate person within school in order to keep him / her and other children safe.
* Tell the student what will happen next – the student may agree to go with you to see the designated person; Otherwise let him/her know that someone will come to see him/her before the end of the day.
* Report the information immediately to the School’s DSL
* Do not discuss the matter with anyone else.
* Write an account of the conversation immediately afterwards and hand it to the DSL as soon as possible.
* The report should be factual and not include any opinions or judgments. The designated member of staff will retain a copy of all written records, securely locked at all times.
* Seek support if you feel distressed.
* Follow up with a DSL if you are concerned further.

**Appendix B: Actions where there are concerns about a child**



**Appendix C – Procedure to be followed in the event of a disclosure**



**Appendix D – Procedure for reporting a concern**

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**Appendix E – Allegation of abuse by a member of school staff, supply staff or volunteer (teaching or non-teaching)**

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**Appendix F - Referral procedure for when a child/young person discloses to a member of school staff an allegation of abuse by a Headteacher.**

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**Appendix G – Procedure for referring a concern to CHANNEL**



**Appendix H: allegations of abuse made against staff, including supply teachers and volunteers**

This section of this policy applies to all cases in which it is alleged that a current member of staff, supply staff, a volunteer, a governor, or other person connected to the school, has:

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

It applies regardless of whether the alleged abuse took place in the school. Allegations against a teacher who is no longer teaching and historical allegations of abuse will be referred to the police.

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

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

**The initial response to an allegation**

Where the school or college identifies a child has been harmed, that there may be an immediate risk of harm to a child or if the situation is an emergency, they should contact children’s social care and as appropriate the police immediately as per the processes explained in Part one of this guidance.

There are two aspects to consider when an allegation is made:

1. **Looking after the welfare of the child** - the designated safeguarding lead is responsible for ensuring that the child is not at risk and referring cases of suspected abuse to the local authority children’s social care as described in Part one of this guidance.
2. **Investigating and supporting the person subject to the allegation** - the case manager should discuss with the LADO, the nature, content and context of the allegation, and agree a course of action.

Before contacting the LADO, basic enquiries will be made in line with local procedures to establish the facts to help them determine whether there is any foundation to the allegation, being careful not to jeopardise any future police investigation. For example:

* was the individual in the school or college at the time of the allegations?
* did the individual, or could they have, come into contact with the child?
* are there any witnesses? and,
* was there any CCTV footage?

When to inform the individual of the allegation should be considered carefully on  a case by case basis, with guidance as required from the LADO, and if appropriate children’s social care and the police.

If there is cause to suspect a child is suffering, or is likely to suffer significant harm, a strategy discussion involving the police and/or children’s social care will be convened in accordance with the statutory guidance ‘[Working Together to Safeguard](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2) [Children](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2)’. If the allegation is about physical contact, for example restraint, the strategy discussionor initial evaluation with the LADO should take into account that teachers and other school and college staff are entitled to use reasonable force to control or restrain children in certain circumstances, including dealing with disruptive behaviour.

Where the case manager is concerned about the welfare of other children in the community or the member of staff’s ’s family, they should discuss these concerns with the DSL and make a risk assessment of the situation. It may be  necessary for the DSL to make a referral to children’s social care.

Where it is clear that an investigation by the police or children’s social care is unnecessary, or the strategy discussion or initial assessment decides that is the case, the LADO should discuss the next steps with the case manager.

**Suspension of the accused until the case is resolved**

Suspension will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. If in doubt, the case manager will seek views from their personnel adviser and the LADO, as well as the police and children’s social care where they have been involved.

Where the school is made aware that the Secretary of State has made an interim prohibition order, in respect of an individual who works at the school, they should take immediate action to ensure the individual does not carry out work in contravention of the order. This means that pending the findings of the TRA investigation, the individual must not carry out teaching work.

In many cases, an inquiry can be resolved quickly and without the need for suspension. The employer will decide on whether the individual should continue to work at the school, based on consultation with the LADO who will provide relevant information they have received from the police or children’s social care on whether they have any objections to the member of staff continuing to work during the investigation of the case. The case manager should be as inventive as possible to avoid suspension.

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

* Redeployment within the school so that the individual does not have direct contact with the child or children concerned
* Providing an assistant to be present when the individual has contact with children
* Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
* moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made clear that this is not a punishment and parents have been consulted.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation. The case manager should consider the potential permanent professional reputational damage to employees that can result from suspension where an allegation is later found to be unfounded, unsubstantiated, malicious, or false.

If immediate suspension is considered necessary, the case manager should record the rationale and justification for such a course of action. This should also include what alternatives to suspension have been considered and why they were rejected.

Where it has been deemed appropriate to suspend the person, written confirmation should be given within one working day, giving as much detail as appropriate for the reasons for the suspension. It is not acceptable for an employer to leave a person who has been suspended without any support. The person should be informed at the point of their suspension who their named contact is within the organisation and provided with their contact details.

**Procedure for dealing with allegations**

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

* Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
* Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
* Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children’s social care services, as appropriate
* **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
* **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
* **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children’s social care services as appropriate
* Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.
* Where there is a lack of appropriate resources within the school, or the nature or complexity of the allegation requires it, the allegation will require an independent investigator.
* The case manager should monitor the progress of cases to ensure that they are dealt with as quickly as possible in a thorough and fair process. Reviews should be conducted at fortnightly or monthly intervals, depending on the complexity of the case.
* Wherever possible, the first review should take place no later than four weeks after the initial assessment. Dates for subsequent reviews, ideally at fortnightly intervals, should be set at the review meeting if the investigation continues. The LADO will provide advice and guidance. The LADO’s role is not to investigate the allegation, but to ensure that an appropriate investigation is carried out, whether that is by the police, children’s social care, the school or college, or a combination of these.
* Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children’s social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
* Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
* Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

**Additional considerations for supply staff and all contracted staff**

In some circumstances the school will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply because agencies will have their own policies and procedures; for example, supply teachers or contracted staff provided by an employment agency or business.

If there are concerns or an allegation is made against someone not directly employed by the school, such as supply staff provided by an agency or contractor, we will take the actions below in addition to our standard procedures.

* We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our local authority designated officer to determine a suitable outcome
* The governing board will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation
* We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the local authority designated officer as required
* They will be advised to contact their trade union representative if they have one, or a colleague for support.
* We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)
* When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

**Governors**

* If an allegation is made against a governor, the school should follow our own local procedures. Where an allegation is substantiated, they should follow the procedures to consider removing them from office.

**Supporting those involved - Duty of care**

The welfare of a child is paramount and this will be the prime concern in terms  of investigating an allegation against a person in a position of trust. However, when an allegation or safeguarding concern is being investigated it is likely to be a very stressful experience for the adult subject of the investigation, and potentially for their family members. It is important that an employer offers appropriate welfare support at such a time and recognises the sensitivity of the situation. Information is confidential and should not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Employers have a duty of care to their employees. They should:

* manage and minimise the stress caused by the allegation
* inform the individual as soon as possible, explaining the likely course of action, guided by the LADO, and the police where necessary;
* advise the individual to contact their trade union representative, or a colleague for support;
* appoint a named representative to keep the person informed about progress of the case;
* provide access to counselling or medical advice where appropriate. For staff in schools maintained by the local authority this may include support via the local authority’s occupational health arrangements; and
* not prevent social contact with work colleagues and friends, when staff are suspended, unless there is evidence to suggest this may prejudice the gathering of evidence.

Parents or carers of the child or children involved should be:

* formally told about the allegation as soon as possible. The case manager should consult the LADO and, where involved, children’s social care and/or the police on what information can be disclosed;
* kept informed about the progress of the case, only in relation to their child - no information can be shared regarding the staff member; and
* made aware of the requirement to maintain confidentiality and unwanted publicity about any allegations made against teachers in schools whilst investigations are in progress.

**Timescales**

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

**Definitions for outcomes of allegation investigations**

The definitions that should be used when schools and colleges determine the outcome of an allegation are set out below:

1. **Substantiated**: there is sufficient evidence to prove the allegation;
2. **Malicious**: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;
3. **False**: there is sufficient evidence to disprove the allegation;
4. **Unsubstantiated**: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
5. **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

**Specific actions**

1. If the allegation is **substantiated** and the person is dismissed; resigns, or otherwise ceases to provide his or her services or the employer ceases to use the person’s services:
* The employer has a legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
* In the case of a member of teaching staff, the  case manager **must** consider whether to refer the matter to the TRA to consider prohibiting the individual from teaching.
* There is a legal requirement for employers to make a referral to the DBS where     they consider an individual has engaged in conduct that harmed (or is likely to harm) a child; or if a person otherwise poses a risk of harm to a child

**Action following a criminal investigation or prosecution**

The police should inform the LADO and the employer immediately when:

* a criminal investigation and any subsequent trial is complete,
* it is decided to close an investigation without charge, or
* it is decided not to continue to prosecute after the person has been charged.

In those circumstances, during the joint assessment meeting the LADO should discuss with the case manager whether any further action, including disciplinary action, is appropriate and, if so, how to proceed.

**Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is determined to be **unsubstantiated, unfounded, false or malicious**, the LADO, the case manager and DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children’s social care may be appropriate.

If a report is shown to be deliberately invented or malicious, the school should consider whether any disciplinary action is appropriate against the individual who made it as per the behaviour policy.

**Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. Guidance and advice are usually provided via HR or the LADO. Most people will benefit from some help and support to return to work after a stressful experience.

Depending on the individual’s circumstances, a phased return and/or the provision of a mentor to provide assistance and support in the short term may be appropriate.

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

**Confidentiality and Information sharing**

In an allegations management meeting or during the initial assessment of the case, the agencies involved should share all relevant information they have about the person who is the subject of the allegation, and about the alleged victim

Where the police are involved, wherever possible the school should ask the police to obtain consent from the individuals involved to share their statements and evidence for use in the employer’s disciplinary process. This should be done as their investigation proceeds and will enable the police to share relevant information without delaying the conclusion of their investigation or any court case.

Children’s social care should adopt a similar procedure when making enquiries to determine whether the child or children named in the allegation are in need of protection or services, so that any information obtained in the course of those enquiries which is relevant to a disciplinary case can be passed to the employer without delay.

The school **must** make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 amended the Education Act 2002, to introduce reporting restrictions. These provisions made it an offence (except in the limited circumstance expressly permitted by the legislation), for any person to publish any material that may lead to the identification of a teacher in a schoolwho has been accused by, or on behalf of, a child from the same school (where that identification would identify the teacher as the subject of the allegation).

The reporting restrictions apply until:

* the point that the accused person is charged with a relevant offence; or
* the Secretary of State or the General Teaching Council for Wales publishes information about an investigation or decision in a disciplinary case arising from the allegation.

The reporting restrictions are disapplied if the individual to whom the restrictions  apply effectively waives their right to anonymity by going public themselves or by giving their written consent for another to do so or if a court lifts the reporting restrictions in response to a request to do so.

The legislation prevents the “publication” of material by any person that may lead to the identification of the teacher who is the subject of the allegation. “Publication” includes “any speech, writing, relevant programme or other communication in whatever form, which is addressed to the public at large or any section of the public.” This means that a parent who, for example, published details of the allegation on a social networking site would be in breach of the reporting restrictions (if what was published could lead to the identification of the teacher by members of the public). In circumstances where schools need to make parents aware about an allegation, they should make parents and others aware that there are restrictions on publishing information.

**Record-keeping**

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

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

The purpose of the record is to enable accurate information to be given in response to any future request for a reference. It will provide clarification in cases where future DBS checks reveal information from the police about an allegation that did not result in a criminal conviction and it will help to prevent unnecessary re-investigation if, as sometimes happens, an allegation re-surfaces after a period of time.

**‘Lower level’ concerns that do not meet the harm threshold**

We want to promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school are dealt with promptly and appropriately.

Creating a culture in which **all** concerns about adults (including allegations that do not meet the harms threshold) should be shared responsibly and with the right person, recorded and dealt with appropriately. This should allow us to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the School are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the School.

**What is a low level concern?**

The term ‘low-level’ concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold as set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ - that an adult working in or on behalf of the school or college may have acted in a way that:

* is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, and
* does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

Examples of such behaviour could include, but are not limited to:

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

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.

**Sharing low-level concerns**

Low-level concerns about a member of staff should be reported to the DSL. Where a low-level concern is raised about the DSL, it should be shared with the Headmistress.

Schools and colleges should ensure they create an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Where a low-level concern relates to a person employed by a supply agency or a contractor to work in the school, that concern should be shared with the DSL, and/or Headmistress and recorded, and their employer notified about the concern, so that any potential patterns of inappropriate behaviour can be identified.

**Recording low-level concerns**

All low-level concerns should be recorded in writing by DSL. The record should include details of the concern, the context in which the concern arose, and action 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 must be   kept confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR).

Records are reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, a course of action, is decided upon, either through its disciplinary procedures or where a pattern of behaviour moves from a concern to meeting the harms threshold, in which case it should be referred to the LADO. Consideration should also be given to whether there are wider cultural issues within the school that enabled the behaviour to occur and where appropriate policies could be revised or extra training delivered to minimise the risk of it happening again. Records are retained until the individual leaves their employment.

**References**

In accordance with KCSIE, 2021, the School will only provide  substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a  reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should **not** be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found  to be substantiated, it should be referred to in a reference.

**Responding to low-level concerns**

Concerns about safeguarding should be reported to the DSL. If the concern has been raised via a third party, the DSL should collect as much evidence as possible by speaking:

* directly to the person who raised the concern, unless it has been raised   anonymously;
* to the individual involved and any witnesses.
* The information collected will help them to categorise the type of behaviour and   determine what further action may need to be taken. All of this needs to be recorded along with the rationale for decisions and action taken**.**

**References**

In accordance with KCSIE, 2021, the School will only provide  substantiated safeguarding allegations in references. Low level concerns should not be included in references unless they relate to issues which would normally be included in a  reference, for example, misconduct or poor performance. It follows that a low-level concern which relates exclusively to safeguarding (and not to misconduct or poor performance) should not be referred to in a reference. However, where a low-level concern (or group of concerns) has met the threshold for referral to the LADO and found  to be substantiated, it should be referred to in a reference.

**Learning lessons**

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

This will include consideration of (as applicable):

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

**Appendix I: Specific Safeguarding Issues**

Staff should have an awareness of safeguarding issues – some of which are listed below. In addition, a number of these are mentioned in the safeguarding induction discussion and during refreshers.

Staff should be aware that behaviours linked to the likes of drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

* Child abduction and community safety incidents
* Children in the court system
* Children missing from education, home or care
* Children with family members in prison
* Child criminal exploitation (CCE)
* Child sexual exploitation (CSE)
* County Lines
* Modern Slavery and the National Referral Mechanism
* Cybercrime
* Domestic abuse
* So-called ‘honour’-based abuse (including Female Genital Mutilation and Forced Marriage)
* Drugs
* Elective Home Education
* Fabricated or induced illness
* Faith abuse
* Gangs and youth violence
* Gender-based violence/violence against women and girls (VAWG)
* Hate
* Homelessness
* Online safety
* Peer on Peer abuse (child on child abuse)
* Radicalisation
* Relationship abuse
* Sexual violence and sexual harassment
* Sharing of nudes and semi-nudes
* Trafficking
* Upskirting

### Children missing from education, home or care

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.

It is important the school’s response to children missing from education supports identifying such abuse and also helps prevent the risk of them going missing in the future. This includes when problems are first emerging but also where children are already known to local authority children’s social care and need a social worker (such as on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.

See the separate ‘Child Missing Education Policy and Procedures’ for further information.

### Peer on Peer/child on child abuse

In addition, all staff should be aware that children can abuse other children (often referred to as peer on peer abuse). Students may be harmed by other students, children or young people. It can happen both inside and outside of school or college and online. It is important that all staff recognise the indicators and signs of peer on peer abuse and know how to identify it and respond to reports.

All staff should understand that even if there are no reports in their schools or colleges it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer on peer abuse they should speak to their designated safeguarding lead (or deputy).

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

Gender issues can be prevalent when dealing with peer on peer abuse.

Peer on peer abuse is most likely to include, but not limited to:

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

Canbury actively seeks to raise awareness of and prevent all forms of peer-on-peer abuse by educating all Governors, Senior Leadership Team, staff and volunteers, students, and parents about this issue.

As a school we will minimise the risk of allegations against other students by:

* Providing a developmentally appropriate PSHE syllabus which develops students understanding of acceptable behaviour and keeping themselves safe
* Having systems in place that are well promoted, easily understood and easily accessible

for any student to raise concerns with staff, knowing that they will be listened to, believed and valued

* Delivering targeted work on assertiveness and keeping safe to those students identified as being at risk
* Developing robust risk assessments and providing targeted work for students identified as being a potential risk to other students
* Ensuring that all peer-on-peer abuse issues are fed back to the DSL promptly so that they can spot and address any concerning trends and identify students who may be in need of additional support. One way in which this is done is via the weekly staff meeting at which all concerns about students (including peer-on-peer abuse issues) are discussed
* a recognition that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not being reported
* Challenging the attitudes that underlie such abuse (both inside and outside the classroom)
* Engaging families on this issue
* Working with Governors, Senior Leadership Team, all staff and volunteers, students and parents to address equality issues, to promote positive values, and to encourage a culture of tolerance and respect amongst all members of the School community
* Creating conditions in which our students can aspire to and realise safe and healthy relationships

How Canbury school deals with an allegation of peer on peer abuse is set out in section 8 of this policy.

See also:

* Separate policy: Sexual violence, sexual harassment & Harmful Sexual Behaviours Procedures
* Child Sexual Exploitation: Appendix I of this document
* Sexual violence and sexual harassment: Appendix I of this document
* Sharing of nudes and semi-nudes: Appendix I of this document

### Children missing from education

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

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

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

**Staff must be aware of the school’s ‘Child missing from education policy’.**

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

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. CSE and CCE can affect children, both male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

Indicators of both CCE and CSE can include a child:

* Appearing with unexplained gifts or new possessions
* Associating with other young people involved in exploitation
* Suffering from changes in emotional wellbeing
* Misusing drugs and alcohol
* Going missing for periods of time or regularly coming home late
* Regularly missing school or education or not taking part in education.

### Child Criminal Exploitation (CCE)

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

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

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

### Child sexual exploitation (CSE)

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 non-contact 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 occur over time or be a one-off occurrence, and may happen without the child’s immediate knowledge e.g. through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16 and 17 year olds who can legally consent to have sex. Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

Signs include:

• underage sexual activity

• inappropriate sexual or sexualised behaviour

• sexually risky behaviour, 'swapping' sex

• repeat sexually transmitted infections

• in girls, repeat pregnancy, abortions, miscarriage

• receiving unexplained gifts or gifts from unknown sources

• having multiple mobile phones and worrying about losing contact via mobile

• having unaffordable new things (clothes, mobile) or expensive habits (alcohol, drugs)

• changes in the way they dress

• going to hotels or other unusual locations to meet friends

• seen at known places of concern

• moving around the country, appearing in new towns or cities, not knowing where they are

• getting in/out of different cars driven by unknown adults

• having older boyfriends or girlfriends

• contact with known perpetrators

• involved in abusive relationships, intimidated and fearful of certain people or situations

• hanging out with groups of older people, or anti-social groups, or with other vulnerable peers

• associating with other young people involved in sexual exploitation

• recruiting other young people to exploitative situations

• truancy, exclusion, disengagement with school, opting out of education altogether

• unexplained changes in behaviour or personality (chaotic, aggressive, sexual)

• mood swings, volatile behaviour, emotional distress

• self-harming, suicidal thoughts, suicide attempts, overdosing, eating disorders

• drug or alcohol misuse

• getting involved in crime

• police involvement, police records

• involved in gangs, gang fights, gang membership

• injuries from physical assault, physical restraint, sexual assault.

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

### Domestic Abuse

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

* Psychological
* Physical
* Sexual
* Financial
* Emotional

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. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

The DSL will provide support according to the child’s needs and update records about their circumstances.

### Elective home education (EHE)

Many home educated children have an overwhelmingly positive learning experience. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

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

worker.

### Female Genital Mutilation (FGM)

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

Section 8 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a student is at risk of FGM.

Indicators that FGM has already occurred include:

* A student confiding in a professional that FGM has taken place
* A mother/family member disclosing that FGM has been carried out
* A family/student already being known to social services in relation to other safeguarding issues
* A girl:
	+ Having difficulty walking, sitting or standing, or looking uncomfortable
	+ Finding it hard to sit still for long periods of time (where this was not a problem previously)
	+ Spending longer than normal in the bathroom or toilet due to difficulties urinating
	+ Having frequent urinary, menstrual or stomach problems
	+ Avoiding physical exercise or missing PE
	+ Being repeatedly absent from school, or absent for a prolonged period
	+ Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
	+ Being reluctant to undergo any medical examinations
	+ Asking for help, but not being explicit about the problem
	+ Talking about pain or discomfort between her legs

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

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

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

### Forced marriage

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

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

We are aware of the ‘one chance’ rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

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

The DSL will:

* Speak to the student about the concerns in a secure and private place
* Activate the local safeguarding procedures and refer the case to the local authority’s designated officer
* Seek advice from the Forced Marriage Unit on 020 7008 0151 or fmu@fco.gov.uk

For ongoing support, the DSL may refer the student to the Mental Health Lead, tutor and/or ELSA support as appropriate.

### Homelessness

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

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

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

### Sharing of nudes and semi-nudes

Alternative definitions

Many professionals may refer to ‘nudes and semi-nudes’ as:

* youth produced sexual imagery or ‘youth involved’ sexual imagery
* indecent imagery. This is the legal term used to define nude or semi-nude images and videos of children and young people under the age of 18.
* ‘sexting’. Many adults may use this term, however some young people interpret sexting as ‘writing and sharing explicit messages with people they know’ rather than sharing images
* image-based sexual abuse. This term may be used when referring to the non-consensual sharing of nudes and semi-nudes.

Terms such as ‘revenge porn’ and ‘upskirting’ are also used to refer to specific incidents of nudes and semi-nudes being shared. However, these terms are more often used in the context of adult-to-adult non-consensual image sharing offences. (see ‘Upksirting’ below for further details).

Understanding motivations and behaviours

Nudes and semi-nudes can be shared by, and between, children and young people under a wide range of circumstances and are often not sexually or criminally motivated. The School’s response to an incident will differ depending on the motivations behind the incident and the appropriateness of the child or young person’s/people’s behaviour. In order to ensure an appropriate and proportionate response to an incident of nudes and semi-nudes being shared, schools can use the tools set out below.



**Assessing behaviour**

DSLs (or an education setting’s equivalent) will need to be mindful that behaviour, which may not initially appear to be sexually motivated, may have occurred as a result of risky or harmful behaviour or sexual abuse being ‘normalised’ for children and young people.

Hackett’s ‘Continuum of children and young people’s sexual behaviours’ model can also help practitioners to understand that children and young people’s sexual behaviours exist on a wide continuum from normal to abusive and violent behaviours and may move fluidly between each category. It is important to note that an isolated incident that demonstrates problematic or abusive behaviour may not necessarily be indicative of the child or young person’s overall sexual behaviour.



It is important for professionals to place a child’s sexual behaviour within the context of their age and development. DSLs (or equivalents) must ensure that they are familiar with and follow the relevant local policies and procedures to help them do so. This includes contact with safeguarding partners and guidance on recognising and responding to harmful behaviours and/or underage sexual activity when dealing with children under 13. Frameworks such as Brook’s [Sexual Behaviours Traffic Light Tool](https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/) can also be used to identify when a child or young person’s sexual behaviour is a cause for concern in relation to their development.

Any child or young person displaying harmful sexual behaviour should be safeguarded and supported in moving forward from the incident and adopting positive behaviour patterns.

Where a child or young person displays appropriate sexual behaviour within the context of their age or development, consideration should still be given as to whether the taking or sharing of the nude or semi-nude raises any additional concerns.

The law

*Indecent images of children*

Responding to incidents of sharing nudes and semi-nudes is complex because of its legal status. Making, possessing and distributing any imagery of someone under 18 which is ‘indecent’ is illegal. This includes imagery of yourself if you are under 18.

The relevant legislation is contained in the Protection of Children Act 1978 (England and Wales) as amended in the Sexual Offences Act 2003 (England and Wales).

Specifically:

* it is an offence to possess, distribute, show and make indecent images of children
* the Sexual Offences Act 2003 (England and Wales) defines a child, for the purposes of indecent images, as anyone under the age of 18

‘Indecent’ is not defined in legislation. When cases are prosecuted, the question of whether any photograph of a child is indecent is for a jury, magistrate or district judge to decide based on what is the [recognised standard of propriety](https://www.cps.gov.uk/legal-guidance/indecent-and-prohibited-images-children).

Indecent imagery does not always mean nudity; however, images are likely to be defined as such if they meet one or more of the following criteria:

* nude or semi-nude sexual posing (e.g. displaying genitals and/or breasts or overtly sexual images of young people in their underwear)
* someone nude or semi-nude touching themselves in a sexual way
* any sexual activity involving a child
* someone hurting someone else sexually
* sexual activity that includes animals

*Non-consensual image sharing*

The non-consensual sharing of private sexual images or videos with the intent to cause distress is also illegal. The relevant legislation is contained in section 33 of the Criminal Justice and Courts Act 2015.

The police response

The NPCC has made it clear that incidents involving sharing nudes and semi-nudes should have an immediate focus on safeguarding children.

In many cases, education settings may respond to incidents without involving the police, for example where an incident can be defined as ‘experimental’ and there is no evidence of abusive or aggravating elements.

The police may, however, need to be involved in some cases to ensure thorough investigation, including the collection of all evidence (for example, through multi-agency checks). Where there are abusive and/or aggravating factors, incidents should always be referred to the police through the Multi-Agency Safeguarding Hub (MASH) or equivalent

Even when the police are involved, a criminal justice response and formal sanction against a child or young person would only be considered in exceptional circumstances.

Crime recording

When an incident of sharing nudes and semi-nudes is reported to police, they are obliged, under the Home Office Counting Rules and National Crime Recording Standards, to record the incident on their crime systems. The incident will be listed as a ‘crime’ and the child or young person involved may be listed in relation to it.

This is not the same as having a criminal record. See full UKCIS document for further clarification of how this would work including invocation of Outcome 21: “Further investigation, resulting from the crime report, which could provide evidence sufficient to support formal action being taken against the suspect is not in the public interest. This is a police decision.”

### Online safety

See also separate ‘E-Safety Policy, Adult ICT Acceptable Use Policy, Student ICT Acceptable Use Policy, Mobile phone and devices policy, Social Media Policy, Staff Code of Conduct, Taking, Storing and Using Images of Pupils Policy)

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school or college to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate.

The use of technology has become a significant component of many safeguarding issues. Child sexual exploitation; radicalisation, sexual predation, technology often provides the platform that facilitates harm.  The harms can be broadly classified under the following headings:

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

Our IT manager has a key role in maintaining a safe technical infrastructure at the School and in keeping abreast of the rapid succession of technological developments. He is responsible for the security of our hardware system including filters to block inappropriate websites. He monitors the use of the Internet and emails and will report to the DSL and Headmistress inappropriate usage, such as accessing websites likely to produce a detrimental influence.

However, the explosion in technology means that blocking and barring sites alone is inadequate.  We teach all of our students to understand why they need to behave responsibly if they are to protect themselves.  In addition to learning about e-safety in PSHE and in IT lessons, e-safety sessions are delivered to students and their families on an annual basis.

In addition, students are not permitted to use mobile phones or other personal devices during the school day and know that these will be confiscated if rules are breached.

### Preventing radicalisation

* **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
* **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
* **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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk, this training is on entry to the school and refreshed regularly.

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

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

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

Staff will be alert to changes in students’ behaviour.

The government website [Educate Against Hate](http://educateagainsthate.com/parents/what-are-the-warning-signs/) and charity [NSPCC](https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/protecting-children-from-radicalisation/) say that signs that a student is being radicalised can include:

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

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

If staff are concerned about a student, they will follow our procedures set out in section 8 of this policy, including discussing their concerns with the DSL.

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

Further information on the school’s measures to prevent radicalisation are set out in other school policies and procedures, including: **PREVENT and Upholding British Values Policy.**

### Serious Violence

In the 2018 Serious Violence Strategy, the government defines serious violence as “specific types of crime such as homicide, knife crime, and gun crime and areas of criminality where serious violence or its threat is inherent, such as in gangs and county lines drug dealing.

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 of friendships or relationships with older individuals or groups
* A significant decline in performance
* Signs of self harm or significant change in wellbeing
* Signs of assault or unexplained injuries
* Unexplained gifts or new possessions.

There are a 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 maltreatment and having been involved in offending, such as theft or robbery.

Further information found at: [Preventing youth violence and gang involvement](https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence) and its [Criminal exploitation of children and vulnerable adults: county lines guidance](https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines)

### So-called ‘honour-based’ abuse (including FGM and forced marriage)

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

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

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

### Sexual violence and Sexual Harassment

Sexual violence and sexual harassment can occur between two children, or a group of children of any age. Both sexes may be affected although girls are more likely to be victims of sexual violence, and boys are more likely to be perpetrators of sexual harassment.  Children with SEND are likely to be more vulnerable.

**Sexual violence** refers to rape, assault by penetration or sexual assault.

**Sexual harassment** includes sexual comments; sexual jokes; physical behaviour such as deliberately brushing against someone or displaying photos of a sexual nature, and online activity including sharing of nude and semi-nude images or video, or making inappropriate sexual comments (note - this list is not exhaustive).

**Harmful sexual behaviours** in children are those which are inappropriate, problematic, abusive and violent; when considering harmful sexual behaviour, the ages and developmental stages of the children involved should be considered.

Awareness

Students are taught about safeguarding, healthy relationships, their bodies and their rights through PSHE and SRE. We emphasise that sexual violence and sexual harassment is not acceptable, is not ‘part of growing up’ or ‘boys being boys’ and should not be tolerated.

Students are taught about consent in PSHE lessons, learning that consent is about having the freedom and capacity to choose; that consent to sexual activity may be given to one sort of sexual activity but not another; that consent can be withdrawn at any time during sexual activity and each time activity occurs; and that there are limits to consent:

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

Staff understand that sexual violence and sexual harassment can be driven by wider societal forces, such as sexist stereotypes and language and for these reasons preventative education must be deployed. Staff know how to report a concern and advice may be given.

**In response to the ‘Everyone’s Invited’ website, further provision has been put in place to reinforce current and ongoing provision. Additional sessions around healthy relationships and consent will be built into PSHE sessions going forward.**

**Current Provision**

* All students and parents have access to the pastoral team: Form Tutors, Deputy Head Pastoral and Wellbeing lead – all these have an open-door policy and the Deputy Head Pastoral delivers messages about respect and healthy relationships in assemblies.
* Around Internet Safety week, students receive e-safety sessions. In age-appropriate sessions these look at the dangers of online relationships and the sharing of nude and semi-nude images. A session is also on offer for families to alert parents to latest trends and dangers in the online world.
* Weekly PSHE lessons incorporating the mandatory Relationships and Sex Education teaching. PSHE is taught under three central themes, one of which is Relationships. This theme covers age appropriate topics such as friendships, bullying, conflict, sexual relations, consent and e-safety.
* Students receive e-safety sessions in IT and PSHE lessons.
* Over the course of the year our Safer Schools Team (Police) deliver sessions on Staying Safe and Consent.
* Outside speakers, such as Brook to deliver sessions on contraception and healthy relationships to KS4 and KS5

**Further Provision** **Moving Forward**

* Peer Mentors (trained KS4/5) can be paired with younger students should those younger students feel more comfortable talking to someone closer to their own age about general or specific concerns.
* The new, dedicated NSPCC helpline - *0800 136 663* - for sexual abuse in schools displayed in posters around the School. This will provide victims of sexual abuse in schools with the appropriate support and advice, including how to contact the police and report crimes. The helpline will also provide support to parents and professionals.
* An audit of all sexual abuse or harassment cases reported to the School will be reviewed annually to identify patterns.

**Helplines**

* Dedicated NSPCC helpline *-* 0800 136 663 (8am -10pm or 9am-6pm at the weekends or email **help@nspcc.org.uk**
* In an emergency dial 999
* Solace Women’s Aid: Services Offered: Child and young people’s services, Counselling, Domestic-sexual violence support, Helpline, Independent Sexual Violence Advocacy (ISVA) service, Practical support/casework, Refuge, Specialist mental health support Service Criteria: Children and young people aged 2 - 18 years, and women aged 18+ Website: <https://www.solacewomensaid.org/>

Advice helpline - 0808 802 5565
Rape Crisis helpline - 0808 801 0305
advice@solacewomensaid.org

* Angelou – Girls and Women

Stephens Place

Children’s Centre

DVIP

Hammersmith and Fulham

0208 748 8298

info@dvip.org

* Victim support Helpline: <https://www.victimsupport.org.uk/>
* Rape Crisis: <https://rapecrisis.org.uk/>
* Rape Crisis RBKC: <https://www.rbkc.gov.uk/kb5/rbkc/fis/service.page?id=h7fZKwWhWuU&familychannel=3_2>
* Women against Rape: <https://womenagainstrape.net/>
* NHS: <https://www.nhs.uk/live-well/sexual-health/help-after-rape-and-sexual-assault/>

Rape and Sexual Abuse Centre (RASAC): <https://www.rasasc.org.uk/>. National Helpline: 0808 802 9999 (12-2.30 & 7-9.30)

### School related weapons incidents

We follow the ‘AfC School Related Weapons or Potential Weapons Incidents’ Protocol and have a duty and a responsibility to protect and safeguard our students and staff. We will inform SPA and the police of any incident involving a weapon or potential weapon.

Teachers have a number of legal powers which include the power to search pupils without consent for a number of ‘prohibited items’. These include: knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for [searching, screening and confiscation](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf%20)

Canbury School recognises that children and young people involved in school related weapons incidents, including the alleged perpetrators, are vulnerable. We will provide support, protection and education to develop a full understanding of the implications of carrying, and or using, weapons.

See further guidance on Searching, screening and confiscation please see our ‘**Searching and Confiscation Procedure’**

### Upskirting

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act came in to force on 12th April 2019. ‘Upskirting’ typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is now a criminal offence. Anyone of any gender, can be a victim.

See further guidance on responding to reports of sexual violence or sexual harassment in section 8 of this policy.

**Appendix J: Checking the identity and suitability of visitors**

All visitors will be required to verify their identity to the satisfaction of reception staff.

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

Visitors will be asked to read the safeguarding notice before entering the school.

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

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

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

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times.

We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

**Appendix K: Non-collection of children and Missing Students**

Refer to the ‘Child Missing Education Policy and Procedures’ for further details.

**Appendix L: Safer Recruitment**

Canbury School follows the Government’s recommendations for the safer recruitment and employment of staff who work with children. We act, at all times, in compliance with the Independent School Standards Regulations. In addition to carrying out safe recruitment procedures, as set out in the DfE's guidance 'Keeping Children Safe in Education, September 2021', members of the teaching and non-teaching staff at the School, including part-time staff, temporary and supply staff, and visiting staff (such as musicians and sports coaches) are subject to the necessary statutory child protection checks, including disqualification under the Childcare Act 2006, and teacher prohibition orders, before starting work. All governors, (unsupervised) volunteers and contractors working regularly during term-time (such as contract catering staff) are also subject to the relevant statutory checks.  Confirmation is obtained that appropriate child protection checks and procedures have been applied to any staff employed by another organisation and working with the School's students at School or elsewhere.

We are aware that personal care and health care are always classified as ‘regulated’ activities, regardless of frequency or level of supervision, and that these activities include: helping a child with eating and drinking for reasons of illness or disability or activities connected with toileting, washing, bathing and dressing for reason of age, illness or disability.

Refer to the ‘Recruitment, Selection and Disclosures Policy and Procedure’ for further details.

**Appendix M: COVID 19**

# Context, scope and definitions

At times during the COVID-19 pandemic parents have been asked to keep their children at home, wherever possible, and for schools to remain open only for those children of workers critical to the COVID-19 response - who absolutely need to attend.

During these times schools and all childcare providers were asked to provide care for a limited number of children - children who are vulnerable, and children whose parents are critical to the COVID-19 response and cannot be safely cared for at home.

This appendix sets out changes in light of COVID-19 and any further school lockdowns connected with the pandemic.

Unless covered here, our normal child safeguarding procedures continue to apply.

**Safeguarding principles**

Although the way we operate during the COVID-19 pandemic is different to normal practice, our core safeguarding principles remain the same.

To reiterate, these are:

* The best interests of the child must always come first
* If anyone has a safeguarding concern about any child, they should act immediately on that concern
* A designated safeguarding lead (or deputy) should be available
* It's essential that unsuitable people aren't allowed to enter the workforce or gain access to children
* Children should be protected when they're online.

**Attendance**

All students are expected to attend from school unless local or government guidance states otherwise.

The government expects all students to attend school, unless they have a statutory reason not to, e.g. if they:

* Have been granted a leave of absence
* Are unable to attend because of sickness
* Are unable to attend because they're complying with clinical and/or public health advice given to them (e.g. if they're self-isolating and waiting for a test result)
* Are absent for a necessary religious observance

We would carry out our standard procedures for recording attendance and following up on absence.

**During a pandemic school closure**

Canbury School and social care will agree with parents/carers whether children in need should be attending school – Canbury School will then follow up on any student that they were expecting to attend, who does not. Canbury School will also follow up with any parent or carer who has arranged care for their child(ren) and the child(ren) subsequently do not attend.

In all circumstances where a vulnerable child does not take up their place at school, or discontinues, Canbury School will notify their social worker.

Canbury School will complete the Government’s [daily online attendance form](https://www.gov.uk/government/publications/coronavirus-covid-19-attendance-recording-for-educational-settings) and supply any information regarding attendance requested by Achieving for Children.

​​Canbury school will fulfil its duty and will be willing to provide on-site education for the children of critical workers in the event of a lockdown that effects school closures.

# Designated Safeguarding Lead

Canbury School has a Designated Safeguarding Lead (DSL) and a Deputy DSL.

The Designated Safeguarding Lead is: Philippa Rich

The Deputy Designated Safeguarding Leads are: Carolyn Yates and Louise Boggi

The DSL will provide support to teachers and staff to help them maintain contact with children (and their families) who remain at home because they're following clinical and/or public health advice (e.g. if they're self-isolating).

Where possible, staff should try and speak directly to children to help identify any concerns. Calls should be made from the school site on school phones and devices – if calls need to be made from personal phones, the number should be withheld.

**During a pandemic school closure**

The optimal scenario is to have a trained DSL (or deputy) available on site. Where this is not the case a trained DSL (or deputy) will be available to be contacted via phone or online video - for example when working from home.

Where a trained DSL (or deputy) is not on site, in addition to the above, a senior leader will assume responsibility for coordinating safeguarding on site. This might include updating and managing access to child protection files, liaising with the offsite DSL (or deputy) and, as required, liaising with children’s social workers where they require access to children in need and/or to carry out statutory assessments at the school.

It is important that all school name staff and volunteers have access to a trained DSL (or deputy). On each day staff on site will be made aware of that person is and how to speak to them.

The DSL will continue to engage with social workers, and attend all multi-agency meetings, which can be done remotely.

# Reporting a concern

**During a pandemic school closure**

Where staff have a concern about a child, they should continue to follow the process outlined in the school’s Safeguarding Policy. Staff are reminded of the need to report any concern immediately and without delay.

Where staff are concerned about an adult working with children in the school, they should report the concern to the Headteacher. If there is a requirement to make a notification to the Headteacher whilst away from school, this should be done verbally and followed up with an email to the Headteacher.

Concerns regarding the Headteacher should be directed to the Chair of Governors: Mary Harknett.

# Safeguarding training and induction

Until further notice online safeguarding and refresher training is being delivered from AfC via video call. This is because face-to-face training may in many cases still not be possible.

DSLs and deputies should continue do what they can to keep up to date with safeguarding developments.

Where new staff are recruited, or new volunteers enter Canbury School, they will continue to be provided with a safeguarding induction.

# Safer recruitment/volunteers and movement of staff

It remains essential that people who are unsuitable are not allowed to enter the children’s workforce or gain access to children. When recruiting new staff, Canbury School will continue to follow the relevant safer recruitment processes, including relevant sections in Keeping Children Safe in Education (Sept 2021).

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

Where Canbury School are utilising volunteers, we will continue to follow the checking

and risk assessment process as set out in Part 3 of Keeping Children Safe in Education (Sept 2021). Under no circumstances will a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Canbury School will continue to follow the legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found in Part 3 of Keeping Children Safe in Education (Sept 2021).

Canbury School will continue to consider and make referrals to the Teaching Regulation Agency (TRA) the TRA’s Teacher misconduct advice for making a referral. During the COVID-19 period all referrals should be made by emailing Misconduct.Teacher@education.gov.uk

Canbury School will continue to ensure that all staff, volunteers and essential visitors sign in and out of the premises and will continue to keep the Single Central Record (SCR) up to date as outlined in Keeping Children Safe in Education (Sept 2021).

# Online safety

Canbury School’s Online Safety Lead is: Philippa Rich. If the Online Safety Lead is unavailable, advice can be sought from Peter Cowley (AfC Adviser for Online Services and Safety).

Canbury School will continue to ensure that appropriate filters and monitoring systems are in place to protect students when they are online on the school’s IT systems or recommended resources.

It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with in line with the Safeguarding Policy and where appropriate referrals should still be made to children’s social care and as required, the police.

Canbury School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering virtual lessons, especially where

webcams are involved:

* Staff and children must wear suitable clothing, as should anyone else in the household.
* Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be clear.
* Any virtual lesson, meeting or 1:1 where staff are alone with a student must be recorded (these are automatically saved on to the Cloud in case there should be any query about content or breaches of codes later on)
* Live classes should be kept to a reasonable length of time, or the streaming may prevent the family ‘getting on’ with their day.
* Language must be professional and appropriate, including any family members in the background.

# Supporting children not in school

Canbury School is committed to ensuring the safety and wellbeing of all its students.

We will continue to provide support for students who have to stay at home, by e.g. delivering support over the phone or getting help from relevant specialist support services.

In the event of a full lockdown and the majority of students working from home we will provide support to students by:

* Scheduled weekly video calls to groups of students with the headmistress during which they are asked about their wellbeing, worries etc.
* Wellbeing video calls, phone calls and emails will be made regularly (in line with individual pupil risk assessments) to ensure that students are safe and well at home. Part of the wellbeing calls will be to monitor access to the remote learning so that support can be given as required.
* Speaking to students who are causing concern have 1:1 video calls arranged with the DSL so they can talk about issues.
* Highlighting ‘cause for concern’ students via a standing item in the weekly staff meeting agenda; staff are asked to note down students, and they are discussed in the meeting.
* Guiding students on how to maintain good mental health and wellbeing through exercise, healthy social and familial interactions, good sleep routines, healthy eating and more. One channel through which this is delivered is the ‘Stronger Together’ Google Classroom
* Students and families reminded of the DSL’s email and encouraged to contact should they need to; support phone numbers/websites are shared with all students.
* All students have school Chromebooks which means we can monitor their usage remotely should the need arise. Chromebooks are also remotely filtered and real time alerts are sent to the DSLs via email.
* Questionnaires about remote teaching & learning sent to students, staff and parents. Within these questionnaires are opportunities to spot potential safeguarding concerns (questions around: mental health, difficulties, anxieties, concerns etc) which are then followed up.
* Form tutors hold morning and afternoon video calls to register students. Anyone absent is logged on a Google sheet that is shared with teaching staff so they can identify if they have arrived at their lesson. If they do not arrive by the end of lesson one, an email/phone call home is made. Parents are made aware that they need to call in as usual if their child is sick, has an appointment, is late etc. This is managed by the reception team.

Where the DSL has identified a student to be on the edge of social care support, or who would normally receive pastoral-type support in school, we will ensure that a robust communication plan is in place for that student. All contacts with the student must be recorded.

The communication plans can include: remote contact; phone contact; door-step visits. Other individualised contact methods should be considered and recorded. Canbury School and its DSL will work closely with all stakeholders to maximise the effectiveness of any communication plan.

This plan must be reviewed regularly (at least once a fortnight) and where concerns arise, the DSL will consider any referrals as appropriate.

The school will share safeguarding messages on its website, email and in communications to families.

Canbury School recognises that school is a protective factor for children and young people, and the current circumstances, can affect the mental health of students and their parents/carers. Teachers at Canbury School will take this into consideration when setting expectations of students’ work where they are at home.

Where vulnerable children and young people are absent, we will:

* + follow up with the parent or carer, working with the local authority and social worker (where applicable), to explore the reason for absence and discuss their concerns
	+ encourage the child or young person to attend educational provision, working with the local authority and social worker (where applicable), particularly where the social worker and the Virtual School Head (where applicable) agrees that the child or young person’s attendance would be appropriate
	+ focus the discussions on the welfare of the child or young person and ensuring that the child or young person is able to access appropriate education and support while they are at home

# Supporting children in school

Canbury School is committed to ensuring the safety and wellbeing of all its students. Canbury School will continue to be a safe space for all children to attend and flourish should the need arise.

The Headmistress will ensure that appropriate staff are on site and staff to student ratio numbers are appropriate, to maximise safety.

Canbury School will refer to the Government guidance for education and childcare settings on how to implement social distancing and continue to follow the advice from Public Health England on handwashing and other measures to limit the risk of spread of COVID-19.

Where Canbury School has concerns about the impact of staff absence – such as our

Designated Safeguarding Lead or first aiders – we will discuss them immediately with the governors of the school.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child may have suffered abuse, neglect or exploitation. Only trained professionals should attempt to diagnose a mental health problem, but staff are well placed to observe children day-to-day and identify any potential problems.

As such when students return to school from any lockdown, staff will need to look out for behavioural signs, including students being fearful, withdrawn, aggressive, oppositional or excessively clingy, to help identify where support may be needed.

If staff have a mental health concern about a child that is also a safeguarding concern, they should follow the child protection policy and speak to the DSL. If the concern does not fall under a safeguarding category they should speak to the Mental Health Lead and/or the Pastoral Deputy Head.

Details of the types of support offered on site includes: check-in meetings with students and staff, an open-door policy to speak to SLT on duty, 1:1 session’s with the Wellbeing Lead, drawing and talking therapy, ELSA sessions and Lego Therapy.

Canbury School will continue to offer support to students who are **not on site**, this will be done remotely or by phone/email.

Canbury School will ensure that all students have contact details for appropriate support services, such as:

* KOOTH is an online counselling and emotional well-being platform for children and young people <https://www.kooth.com/>
* Childline is a free, private and confidential service where you can talk about anything. 0800 1111 <https://www.childline.org.uk>
* Samaritans is a 24hr free, private and confidential service where you can talk about your worries 116 123 <https://www.samaritans.org/>

# Children moving schools

If any students are temporarily attending other schools or transfer to another school, Canbury School will ensure that they provide the receiving school with all the relevant welfare and child protection information.

Any change of school for children looked after will be led and managed by the Virtual School Headteacher with responsibility for the child.

Canbury School continues to have appropriate regard to data protection and GDPR and are aware that they do not prevent the sharing of information for the purposes of keeping children safe.

# Child on Child abuse

Canbury School recognises that during the COVID-19 pandemic and a possible blended learning situation a revised process may be required for managing any report of such abuse and supporting victims**.**

Canbury School will follow the principles as set out in part 5 of Keeping Children Safe in Education (Sept 2021) and our Safeguarding Policy.

The school will listen and work with the young person, parents/carers and any multi-agency

partner required to ensure the safety and security of that young person.

Concerns and actions must be recorded using the school’s procedure and appropriate referrals made.