

# Child Protection/Safeguarding Policy 2023

## Inicio Educational Trust

Policy Created and Updated by	Date of Adoption	Date to be Reviewed	To be Reviewed By
DSL & Deputy Headteacher BWSfB	September 2023	September 2024	Board of Trustees

# Child Protection / Safeguarding Policy

**Safeguarding Trustee: Ms Lisa Morris**

**School: *Bullers Wood School for Girls***

**Chair of Governors Mr P Selby – Email [clerk@iniciotrust.org](mailto:clerk@iniciotrust.org)**

**Designated Safeguarding Lead (DSL)**

**Mrs Michelle German**

**Deputy Safeguarding Lead and Designated Teacher for Looked After Children**

**Mrs Marie Hemmings**

**Designated Governor for Child Protection/Safeguarding**

**Ms Josephine Greywoode**

**Designated Governor for Looked After Children**

**Ms Josephine Greywoode**

**School: *Bullers Wood School for Boys***

**Chair of Governors Mr I Cogswell – Email [clerk@iniciotrust.org](mailto:clerk@iniciotrust.org)**

**Designated Safeguarding Lead (DSL) and Designated Teacher for Looked After Children**

**Mr Ben Walker**

**Deputy Designated Safeguarding Lead**

**Mr Liam Thornton**

**Designated Governor for Child Protection/Safeguarding**

**Ms Jayne Burman**

**Designated Governor for Looked After Children**

**Ms Jayne Burman**

Schools within the Trust

**Chislehurst School for Girls**

A copy of their Safeguarding Policy is available to view on their website

<https://www.chislehurstschoolforgirls.co.uk>

## 1. Aims

**Inicio Educational Trust** is committed to safeguarding and promoting the welfare of children and young people, and we expect everyone who works in our school to share this commitment. We will ensure that:

- All staff within the MAT are aware of their statutory responsibilities with respect to safeguarding.
- Adults in all our schools take all welfare concerns seriously and encourage children and young people to talk to us about anything that worries them. We will always act in the best interest of the child/young person.
- Staff are properly trained in recognising and reporting safeguarding issues.
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- We provide a systematic means of monitoring children/young people known or thought to be at risk of harm.
- A contextual safeguarding approach (for risks outside of the home) will also be considered when looking at individual cases. All assessments will include this wider picture.
- We have procedures and protocols which will be followed by all staff in cases of suspected abuse and the need for care, including child-on-child abuse.
- We develop and promote working relationships with other agencies.

The DfE has clear guidelines on what schools, governing bodies should do if they suspect that a child/young person has been abused or assaulted. It is not, however, the responsibility of teachers and other staff in schools to investigate suspected abuse. They should not take action beyond that agreed to the procedures established by Bromley Safeguarding Children Partnership (BSCP)

## 2. Definitions

Safeguarding and promoting the welfare of children means:

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

**Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

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

**Sharing of nudes and semi-nudes** (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

**Children** includes everyone under the age of 18.

The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

### 3. Procedures

This policy is based on the DFE's 'Keeping Children Safe In Education' 2023 and 'Working Together To Safeguard Children' 2018. Our procedures will also be in line with Bromley and London Child Protection Procedures 2023 (last updated March 2023).

This can be found at [www.londoncp.co.uk](http://www.londoncp.co.uk)

Links below:

<https://bromleysafeguarding.org/articles.php?id=609> We will ensure that:

- We have Designated Safeguarding Leads and Deputies who will, in line with recommendations in Keeping Children Safe in Education (2023) undertake training and refresher training at two-yearly intervals. All other staff will undertake training regularly.
- All adults (including Governors and Volunteers) who have access to children have been checked as to their suitability and have enhanced DBS checks. The school will implement recruitment procedures as recommended in 'Keeping Children Safe in Education (2023)'.
- All members of staff develop their understanding of recognising the signs and indicators of abuse or need. **(see Annex A).**
- All members of staff know how to respond to a student who discloses abuse. (See Annex B).
- All members of staff are aware that Safeguarding incidents could happen anywhere and they are alert to possible concerns being raised. Safeguarding concerns include those in the family and in wider society (contextual safeguarding), both in person and online.
- Where there is a safeguarding concern, governing bodies and school leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide. Systems should be in place, and they should be well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
- All members of staff may raise concerns directly with Children's Social Care services.
- All staff will receive appropriate Safeguarding and Child protection training (including online safety) at Induction.
- All staff will be kept updated on safeguarding issues and will be able to identify concerns and understand procedures to protect and safeguard children and young people.
- Online Safety training is provided as part of regular updates.

- Staff should be mindful that early information sharing is vital for the effective identification, assessment and allocation of appropriate service provision, whether this is when problems first emerge, or where a child is already known to local authority children's social care.
- All members of staff are aware of any immediate/urgent action required to assist the child/young person, e.g. emergency medical treatment.
- All parents/carers will be made aware of the School's Child Protection/Safeguarding Procedures.
- All staff are responsible for reporting concerns regarding a colleague's behaviour. See Procedures for Raising Concerns (Whistle-blowing). Staff reporting concerns should contact the Headteacher, not the Designated Safeguarding Lead. If staff have concerns for the Head Teacher, they must contact the Chair of Governors.
- The school's procedures will be regularly reviewed and updated. (Last updated September 2022).
- All staff will have seen a copy of this policy and new staff will be given a copy as part of their induction programme.
- Governors will receive regular reports about numbers of child protection referrals, allegations against school staff and other children/young person protection/safeguarding matters.

#### **4. Equality Statement**

Some children have an increased vulnerability to abuse 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. Staff have familiarity with the [Equality Act 2010 and the Public Sector Equality Duty](#) (PSED), the Human Rights Act 1998 and recent reforms to the Act and how they apply to safeguarding

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their sex, 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
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated

#### **5. Roles and Responsibilities**

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

## 5.1 All staff

All staff will read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education. The safeguarding response to children who go missing from education (either for those that have prolonged periods of absence and also for those not on a school roll)
- The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The need for professional curiosity and to raise concerns with the DSL. Not all children may feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they may not recognise their experiences as harmful. Staff must be mindful in determining the best way to build up trusted relationships with pupils which facilitates communication.

## 5.2 The Designated Safeguarding Lead (DSL):

The DSL is a member of the senior leadership team. Each school within the MAT will have their own DSL. The DSL takes lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. The DSL can be contacted out of school hours if necessary by CPOMS or email.

When the DSL is absent, the Deputy will act as cover.

If the DSL and DDSL are not available, the Headteacher will act as cover.

The DSL will be given the time, funding, training, resources and support to:

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Keep the Headteacher informed of any issues and liaise with local authority case managers and designated officers for child protection concerns as appropriate. This is especially the case for ongoing enquiries under section 47 of the Children Act 1989 and police investigations. This should include being aware of the requirement for children to have an Appropriate Adult ([PACE Code C 2019](#)).
- The DSL will liaise with teachers, and promote supportive engagement with parents/carers.

DSLs are asked to work with Headteachers and relevant strategic leads taking lead responsibility for promoting educational outcomes by knowing the welfare, safeguarding and child protection issues that children in need are experiencing, or have experienced, and identifying the impact that these issues might be having on children's attendance, engagement and achievement at school.

The full responsibilities of the DSL and deputies are set out in a separate job description.

### **5.3 The Governing Board will:**

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the Head Teacher to account for its implementation
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.
- The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate
- All governors will read Keeping Children Safe in Education in its entirety.
- All receive appropriate safeguarding training at induction, followed by regular updates. This is in order to test and assure themselves that the safeguarding policies and procedures in place are effective and support robust whole school approach.
- Do all that they reasonably can to limit children's exposure to the risks from the school's or college's IT system and ensure the school or college has appropriate filters and monitoring systems in place and regularly review their effectiveness.

### **5.4 Headteacher**

The Headteacher is responsible for the implementation of this policy, including:

- Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction
- Ensuring that staff understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Support DSL in developing knowledge and skills to encourage a culture of listening and reducing barriers to disclosure
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate
- Communicate this policy to parents/carers via the school website
- Ensuring that all staff and volunteers feel able to raise concerns about poor or unsafe practice with regard to children, and such concerns are addressed sensitively and effectively promptly following agreed whistleblowing policies, where appropriate

## 6. Supporting Children - recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue.

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

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm or is in immediate danger. Anyone can make a referral. See [Section 13](#) for details of how to make a referral.

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

- We recognise that a child/young person who is abused or witnesses violence may find it difficult to develop and maintain a sense of self-worth. We recognise that a child/young person in these circumstances may feel helpless and humiliated. We recognise that a child/young person may feel self-blame.
- We also recognise children who witness domestic abuse are victims, that witnessing domestic abuse can have a lasting impact on children, and that children can be victims in their own relationships too
- We recognise that the school may provide the only stability in the lives of children/young people who have been abused or who are at risk of harm.
- We accept that research shows that the behaviour of a child/young person in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.
- We know that disabled children and young people are more vulnerable to abuse than nondisabled children, and are especially liable to bullying and intimidation. (See Safeguarding disabled children 2009)

Support will be given to all students by:

- Ensuring their wishes and feelings are considered and that the law on child-on-child abuse is there to protect them, not criminalise them.
- Encouraging self-esteem and self-assertiveness while not condoning aggression or bullying.
- Promoting a caring, safe and positive environment within the school.
- Liaising and working together with all other support services and those agencies involved with the safeguarding of children.



- Notifying Children's Social Care as soon as there is a significant concern, and when doing so, will consider what is known about the student's wider context.
- Providing continuing support to a student about whom there have been concerns who leaves the school, by ensuring that appropriate information is forwarded to the student's new school under confidential cover.
- Establishing and maintain an ethos where children and young people feel secure and are encouraged to talk and are always listened to.
- Ensuring all children and young people know that there is an adult in the school whom they can approach if they are worried or in difficulty.
- Ensuring that students are taught about safeguarding, including online, through various teaching and learning opportunities, as part of providing a broad and balanced curriculum.
- The school will consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.

## **7. Confidentiality and Record-Keeping**

- We recognise that all matters relating to Child Protection are confidential, refer to Information Sharing (2018) – Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers
- The Headteacher or the DSL / DDSL will disclose any information about a student to other staff on a need to know basis only.
- All staff must be aware that they have a professional responsibility to disclose information with other agencies to safeguard children.
- All staff must be aware that they must not tell a child/young person that they can keep secrets.
- Information sharing should be with the right people between and within agencies.

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 via CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome

Any non-confidential records will be readily 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 reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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 securely within 5 days of an in-year transfer or within the first 5 days of the start of a new term, and separately from the main student file. 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.

## **8. Supporting Staff**

- We recognise that staff working in the school who have become involved with a child/young person who has suffered harm or appears to be likely to suffer harm may find the situation stressful and upsetting.
- We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate.

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

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Headteacher as soon as possible. If the concerns/allegations are about the Headteacher, speak to the Chair of Governors. Please see Annex F for details on how to identify the difference between low level concerns and concerns that meet the threshold of harm.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, other staff, volunteer or contractor) to the Headteacher, report it directly to the local authority designated officer (LADO).

## **10. Allegations of abuse made against other students**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for students. We also recognise the sex-based nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously. Most cases of students hurting other students will be dealt with under the schools’ behaviour policies, but this child protection and 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
- Could put students in the school at risk
- Is violent
- Involves students being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up skirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

See Annex E for more information about preventing child-on-child abuse.

If such an allegation is made, the member of staff receiving the allegation will:

- a) Take the allegation seriously
- b) Ensure the child/young person is safe and supported, in particular taking the proximity of any alleged perpetrator and victim into consideration.
- c) Inform the DSL as soon as possible. The member of staff should then accurately record what they have been informed/observed. This must be recorded on CPOMS, and categorised as Child on Child Abuse.
- d) The DSL will contact the local authority children's social care team and follow its advice, as well as the Police if the allegation involves a potential criminal offence.
  - a) Where the investigation is to be led by the school this will be carried out by the DSL or DDSL. Accounts would be gathered from the victim, alleged perpetrator and any other identified children or members of staff / wider school community.
  - b) If the matter is not referred to the Police for investigation sanctions would follow the school's Behaviour Policy.
  - c) The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.
  - d) The risk assessment and support plan will consider all aspects of possible interaction between students whilst under the care of the school. This is likely to contain points relating to; travel to and from school, timetable changes, movement around the building, social time support, mental health support, peer support. Additionally, we would inform parents/carers of the risk assessment and support plan.
  - e) The DSL will contact the children and adolescent mental health services (CAMHS), or other appropriate external agencies for support.

All concerns/allegations of child-on-child abuse will be handled sensitively, appropriately and promptly and will be investigated including consideration of the wider context in which it may have occurred (as appropriate). The school treats all children involved as being at potential risk and ensures a safeguarding response is in place for both the child who has allegedly experienced the abuse, and the child who has allegedly been responsible for it. Immediate consideration will therefore be given as to how best to support and protect all children involved/impacted.

The school will take into account the views of the child/children affected. Unless it is considered unsafe to do so, the DSL should discuss the proposed action with the child/children and their parents following appropriate liaison with children's social care. The school should manage the child/children's expectations about information sharing, and keep them and their parents informed of developments, where appropriate and safe to do so.

All children affected by child-on-child abuse will be supported by the DSL, DDSL and wider safeguarding team and support from external agencies will be sought, as appropriate. "Victims" will be reassured that they are being taken seriously and that they will be supported and kept safe. The school recognises that children with special educational needs and disabilities or certain health conditions can be more prone to child-on-child group isolation than other children and will consider extra pastoral support for those children provided by the Head of Year.

A student against whom an allegation of abuse has been made may be suspended from the school during the investigation. The school will take advice from relevant local safeguarding partners on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all students involved including the alleged "victim" and "perpetrator". If it is necessary for a student to be interviewed by the Police in relation to allegations of abuse, the school will ensure that, subject to

the advice of the relevant local safeguarding partners, parents are informed as soon as possible and that the students involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the school and advice will be sought as necessary from the relevant local safeguarding partners, such as children's social care and/ or the Police as appropriate.

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

## **11. Allegations against staff (including volunteers, supply teachers, other staff or contractors)**

We recognise the possibility that adults working in the school may harm children, including governors, volunteers, other staff, supply teachers and agency staff or contractors. Any concerns about the conduct of other adults in the school should be taken to the Headteacher without delay; any concerns about the Headteacher should go to the Chair of Governors who can be contacted via email [clerk@iniciotrust.org](mailto:clerk@iniciotrust.org)

If school receive allegations about staff using their premises to run activities for children, they should follow their own Safeguarding Policy, including contacting the LADO (KCSIE, September 2023)

## **Keeping Children Safe during Community activities, after school clubs and Tuition October 2020**

This is non-statutory guidance from the Department for Education (DfE). It aims to help providers of out of school settings (OOSS) understand best practice for creating a safe environment for children in their care and give parents and carers confidence that their child is in a safe activity or learning environment.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/940872/Keeping\\_children\\_safe\\_code\\_of\\_practice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/940872/Keeping_children_safe_code_of_practice.pdf)

We understand that a student may make an allegation against a member of staff who has:

- behaved in a way that has harmed a child/young person, or may have harmed a child/young person;
- possibly committed a criminal offence against or related to a child/young person; or
- behaved towards a child/young person or children/young people in a way that indicates he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children (this includes behaviours that occur outside the school, transferable risk).

If such an allegation is made, the member of staff receiving the allegation will:

- a) take the allegation seriously
  - b) ensure the child/young person is safe and supported
  - c) Inform the headteacher as soon as possible who will
  - d) inform the Local Authority Designated Officer (LADO)
- The Headteacher must decide whether the concern is an allegation or low-level concern, and this should be done in consultation with the LADO. The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold for referral to the Local Authority Designated Officer (LADO) (see below). By having a discussion with the LADO, you are able to get assurance that the necessary action has been taken.

- The Headteacher on all such occasions will discuss the content of the allegation with the Local Authority Designated Officer (Lead Officer for Education Safeguarding).
- If the concern does not meet the threshold for an external investigation, the LADO will pass the allegation back to the school to investigate in-house.
- If the allegation meets the threshold for an external investigation, the DSL will pass the information on to the Headteacher and Chair of Governors to investigate.

If an allegation is made against the Headteacher or the DSL, then the Chair of Governors must be informed, and they will then discuss the allegation with the Local Authority Designated Officer (LADO). The Chair of Governors for Bullers Wood School for Girls is Mr Peter Selby and Bullers Wood School for Boys, Mr Ian Cogswell, both can be contacted by emailing [clerk@iniciotrust.org](mailto:clerk@iniciotrust.org)

- The school will follow the most recent London and Bromley's Safeguarding Children Boards protocols for managing allegations and consult section 4 of the policy KCSIE (2023).
- Support for the individual is vital to fulfilling this duty. Individuals should be informed of concerns or allegations as soon as possible and given an explanation of the likely course of action unless there is an objection by the children's social care services or the police.
- The individual should be advised to contact their trade union representative if they have one, or a colleague for support. They should also be informed to contact Bromley Wellbeing for counselling or medical advice.
- The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The Education Act 2011 introduced reporting restrictions preventing the publication of any material that may lead to the identification of a teacher who has been accused by, or on behalf of, a student from the same school (where that identification would identify the teacher as the subject of the allegation).
- The schools will deal with allegations against supply teachers properly and never decide to cease using a supply teacher due to safeguarding concerns without finding out the facts and liaising with the LADO to determine a suitable outcome.
- See Annex F for detailed procedures on Managing Allegations

### **Low-level Concerns**

Concerns may be graded low-level if the concern does not meet the criteria for an allegation; and the person\* has acted in a way that is inconsistent with the staff code of conduct, including inappropriate conduct outside of work.

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, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating children.

If the Headteacher is in any doubt as to whether the information which has been shared about a member of staff as a low-level concern in fact meets the harm threshold, they should consult with their LADO.

If the concern has been raised via a third party, the Headteacher 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.

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

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

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

- name\* of individual sharing their concerns
- details of the concern
- context in which the concern arose
- details of any witnesses
- action taken

(\* 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. Schools and colleges should decide how long they retain such information, but it is recommended that it is kept at least until the individual leaves their employment.

Records should be reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

If a concerning pattern of behaviour is identified and now meets the criteria for an allegation, then the matter should be referred to the LADO.

The records' review might identify that there are wider cultural issues within the school or college that enabled the behaviour to occur. This might mean that policies or processes could be revised, or extra training delivered to minimise the risk of it happening again.

## **12. Safer Recruitment (Please refer to the MAT's Safer Recruitment Policy)**

In our recruitment and selection of staff and volunteers we will always adhere to the government guidance contained within "*Working Together to Safeguard Children*" (July 2018 – Updated July 2022 – currently under consultation) and "*Keeping Children Safe in Education* (DfE 2023).

- The school will implement its responsibilities for safer recruitment strategies as recommended in the most up to date version of Keeping Children Safe in Education and Safer Recruitment Policies & procedures contained within
- This will include appropriate training for the Headteacher and others who recruit and select staff and volunteers. For example, staff may undertake training provided via the NSPCC.
- New staff will be subject to a 'digital screening' prior to interview in order to ascertain their open access online presence and digital footprint. This may help identify any incidents or issues that have happened, and are publicly available online, which the school might want to explore with the applicant at interview. The school will inform shortlisted candidates that online searches will be done as part of due diligence checks.

- As part of the Safer Recruitment process, all staff being offered positions within the school should have their offers made subject to enhanced DBS checks.
- These checks should be renewed every three years.

### 13. Making a Child Protection Referral:

- Check which Borough the child/young person lives in and contact the appropriate Multi-Agency Safeguarding Hub (also known as MASH Team) for that Borough. Please see Annex C for contact details of MASH Teams.
- Seek advice from the Duty Social Worker if you are unsure whether to make a referral.
- All referrals should be sent in writing using the Multi-Agency Referral Form. The exception is in the case of an urgent child/young person protection, where the referral will be taken over the telephone and followed up in writing by the next working day (24-72 hours).
- With few exceptions, the parents should be informed if a referral is being made. If you are unsure, consult a Duty Social Worker before sending the referral.

### 14. Early Help

A referral for Early Help Assessment is designed as an assessment tool to facilitate early intervention and cooperation between agencies to improve outcomes for children/young people with additional needs.

Every family can go through difficult or challenging times at some point during their lives. If staff are aware of a family that is experiencing problems, they may require support to help them to deal with difficult situations and make things better. Early Help services and support should be offered as soon as a problem or difficulty starts. This is to stop things from getting worse, and to make sure that the family gets the help that they need. The EHA is used when a family would like support to help them with a difficulty; when a professional working with a family recognises that they may require extra support; when a family have lots of professionals working with them and services and information needs to be organised to help make things clearer for them, where the needs of the family are unknown or unmet.

The EHA is entirely consent based and the family can decide at any point that they no longer wish to engage with the process. An EHA is confidential except where there is a risk of serious harm to a child or young person.

Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

**All school staff** should be prepared to identify children who may benefit from **Early Help**. Early Help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years. In the first instance staff should discuss early help requirements with the Designated Safeguarding Lead. Staff may be required to support other agencies and professionals in an Early Help Assessment.

Any child may benefit from early help, but all school 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 they have a statutory Education, Health, and Care Plan).
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines.



- is frequently missing/goes missing from care or from home.
- is at risk of modern slavery, trafficking, sexual or criminal exploitation.
- is at risk of being radicalised or exploited.
- has a family member in prison or is affected by parental offending.
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health adult mental health issues and domestic abuse.
- is misusing drugs or alcohol themselves.
- has returned home to their family from care.
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage.
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.
- Signposting for families in times of need is vital, especially with the impact of the cost-of-living crisis. For further support please visit: [Cost of living - Bromley Well](#)
- A request is received from the child/young person or parent/carer for more support.
- Early Help assessment referrals help identify the needs of the child/young person and to pool knowledge and expertise with other agencies to support the child/young person better. Early Help Assessments are referred to [mash@bromely.gov.uk](mailto:mash@bromely.gov.uk)

Information regarding Early Help in Bromley is found here  
[What is early help for families \(bromley.gov.uk\)](#)

Staff will refer to the Bromley Safeguarding Thresholds Guidance or that of any other borough in which the child/young person resides (e.g. Lewisham).

## 15. Child Protection Case Conferences

- If invited to a Child Protection Case Conference, the DSL will be given priority to attend.
- A report should be completed for the Case Conference using the Bromley Multi-Agency Child Protection Conference Report ANNEX C, or that of any other borough in which the child/young person resides.
- The report should be provided to and discussed with parents and children when appropriate, in advance of the conference. It is important that families do not hear new information at the conference and it is the responsibility of the school who has the relevant information to make this available to the conference in the form of a written, legible and signed report.
- Once the report has been discussed with the parents, it should be provided to the Quality Assurance Unit for the Conference Chair at least 48 hours before an initial conference and five working days in advance of a review conference.
- Please also refer to the school's policies on Bullying, e-safety, Behaviour, Attendance, Health and Safety, First Aid, Procedures for Raising Concern (Whistle-blowing), Staff Code of Conduct and Preventing Radicalisation.

## 16. Online Safety se of Modern Technology

All staff will be aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse and other risks online as well as face to face. In many cases abuse and other risks will take place concurrently both online and offline. Children can also abuse other



children online, this can take the form of abusive, harassing, and misogynistic/misandrist 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.

To address this, The MAT aims to:

- Have robust processes in place to ensure the online safety of students, staff, volunteers and governors.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.
- Regularly update parents and carers about online safety and sites they may access away from school as part of independent study, and who they will interact with on these.

### **The 4 key categories of risk**

Our approach to online safety is based on addressing the following categories of risk:

**Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

**Contact** – being subjected to harmful online interaction with other users, such as child-to-child 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, such as 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

To meet our aims and address the risks above we will educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present

- Staff will not take pictures or recordings of students on their personal phones or cameras
- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

## **Filtering and Monitoring**

All staff receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles, and responsibilities in relation to filtering and monitoring at induction. The training is regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, termly updates, staff briefing notices, e-bulletins and during staff development days), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.

The Governors receive safeguarding training and are aware of their responsibilities.

The roles of the governing body, the Safeguarding Governor, the DSL, the IT services and all staff are defined and monitored.

### **The role of the Governing Body**

- The Governing Body will ensure the school has put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk from the school's IT systems
- The Governing Body will receive an annual report of the risk assessments completed and be alerted to any risks the school community faces
- Ensure there is ongoing effective review of the provision in the school
- Support the school in ensuring that the filtering and monitoring systems are robust

### **The role of the Safeguarding Governor**

- The Safeguarding Governor will work with the Governing body in ensuring the robust filtering and monitoring systems are in place
- Review the filtering and monitoring system with the DSL as part of the termly visits and feedback any issues to the governing body as required.

### **The role of the IT services**

The IT service team will have technical responsibility for:

- Maintaining the filtering and monitoring systems
- Completing checks on the effectiveness of the filtering and monitoring system
- Providing filtering and monitoring reports on a termly basis. These may be discussed with the DSL and other relevant staff in order to ensure the whole community is protected.
- Keeping a record of sites that have been blocked and document the decision as to why
- Completing actions following concerns or checks in systems

## The role of the DSL

### The DSL will:

- Work with the Safeguarding Governor and discuss any risks highlighted by the reports created by the IT provider
- Produce reports for the Governing body reflecting the robust nature of the filtering and monitoring system
- Ensure all staff are trained in their role with regards to filtering and monitoring and know how to report any concerns. This will be at induction, as part of the annual safeguarding updates as well as ongoing and might be in the form of emails, bulletins or in staff briefings.
- Ensure alerts that are created by the school's filtering and monitoring system are responded to by a member of the safeguarding team in a timely way and review what actions are needed to ensure the school community are safe
- Review termly reports and discuss appropriate actions with the IT services team and also the DDSL or wider community
- Work with SLT to ensure that any risks inform the curriculum in RSE to ensure students are kept safe whilst in the community

### The role of all staff

#### All staff should:

- Take part in annual training on their role with regard to filtering and monitoring
- Follow the procedures set out in the training by the school
- Report all concerns with regard to students or staff accessing inappropriate content to the DSL and IT services

The schools' use SENSo as a monitoring system which creates alerts seen by the DSL.

The schools' fully adhere to the filtering and monitoring standards in accordance with:

[Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK \(www.gov.uk\)](#)

[Filtering and Monitoring Standards ACH Grid June 2023.xlsx](#)

[Filtering and Monitoring \(safeguardingschools.co.uk\)](#)

## Mobile phones

Each school's policy regarding mobile phones is clearly taught as part of the behaviour curriculum and found within the Behaviour policy – found on the school's website.

## 17. Students with SEND, disabilities or health conditions

We recognise that students with special educational needs (SEND) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for these students which includes access to the SEND Department and nurture groups. Support from our First Aider Officer for students with medical conditions.

## **18. Children with a social worker/Looked After Children**

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 student 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, which may include working with the Virtual School

### **Children Looked-after**

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.
- Each school within the MAT will have a designated CLA Lead teacher who is responsible for promoting the educational achievement of looked-after children and previously looked after children in line with statutory guidance.
- The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.
- The designated lead staff and governors are also responsible for Children Looked After.
- All children looked after.
- All children looked after have a Personal Education Plan (PEP), which is part of the child's Care Plan. This will be reviewed termly. Advice and support are available through the virtual school virtual headteacher.

As part of their role, the designated CLA teacher 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, including discussing how student premium plus funding can be best used to support looked-after children and meet the needs identified in their Personal Education Plans.

### **Previously Children Looked After (Post-CLA)**

- The designated lead staff and governors are also responsible for Previously Children Looked-After.
- A previously child looked-after is one who is no longer looked after in England and Wales because s/he is the subject of an adoption, special guardianship or child arrangements order which includes arrangements relating to with whom the child is to live, or when the child is to live with any person,

or has been adopted from 'state care' outside England and Wales; and a child is in 'state care' outside England and Wales if s/he is in the care or accommodated by a public authority, a society religious organization or any other organization the sole of main purpose of which is to benefit society.

- Post-CLA support arrangements are distinct to those for CLA and are responsive to the needs of the child and family using the appropriate school support systems which will include PPG but not the PEP process.
- We aim to help raise previously children looked-after parents' and guardians' awareness of the PP+ and other support for previously children looked-after – this includes encouraging parents of eligible previously children looked-after to tell the school if their child is eligible to attract PP+ funding; and play a key part in decisions on how the PP+ is used to support previously children looked after.
- As a school we recognise that not all Post- CLA are underachieving, while some may be underachieving and not eligible for funding. We plan to use our funding creatively to support any individual in which any area of under-performance is evident.

## **19. Complaints and communication**

### **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.

### **Whistleblowing**

The MAT has a separate Whistleblowing Policy that covers concerns regarding the way the school safeguards students – including poor or unsafe practice, or potential failures.

### **Notifying parents or carers**

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

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

If we believe that notifying the parents or carers 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 or carers of all the children involved.

## **20. Covid-19 Safeguarding Procedures**

In circumstances where a parent or carer is hesitant about or does not want to bring their child to an education setting, and their child is considered vulnerable, the social worker and Inicio Educational Trust will explore the reasons for this directly with the parent.

Where parents are concerned about the risk of the child contracting COVID19, Inicio Educational Trust or the social worker will talk through these anxieties with the parent/carer following the advice set out by Public Health England. Inicio Educational Trust will encourage all pupils to attend a school.

Parents or carers are expected to contact the school on the first day of any illness and inform us of the reason for absence so that the correct attendance codes can be used in every case of absence. We expect parents or carers to make contact to make us aware of the status of any COVID-19 tests that have become necessary and update the school on the pupil's welfare.

## **20.1 Supporting children not in school as they are following clinical or public health advice related to Coronavirus (COVID-19)**

Inicio Educational Trust is committed to ensuring the safety and wellbeing of all its students.

Where the DSL has identified a child to be on the edge of social care support or who would normally receive pastoral-type support in school, they should ensure that a robust communication plan is in place for that child or young person.

Details of this plan must be recorded on CPOMS, as should a record of contact the school has made.

The communication plans can include remote contact, phone contact, door-step visits. Other individualised contact methods should be considered and recorded.

Inicio Educational Trust will work closely with all stakeholders to maximise any communication plan's effectiveness.

This plan must be reviewed regularly, and where concerns arise, the DSL will consider any referrals as appropriate.

Inicio Educational Trust recognises that school is a protective factor for children and young people. The current circumstances can affect the mental health of pupils and their parents/carers.

Teachers at Inicio Educational Trust need to be aware of this in setting pupils' work expectations where they are at home.

## **20.2 Supporting children in school**

Inicio Educational Trust is committed to ensuring the safety and wellbeing of all its students. Inicio Educational Trust will continue to be a safe space for all children to attend and flourish.

Inicio Educational Trust will refer to the Government guidance for education and childcare settings.

Inicio Educational Trust will ensure that appropriate support is offered to all students concerning their mental health.

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

Inicio Educational Trust will encourage parents to send their children to school, particularly vulnerable children.

An application is made to consider whether a parent's decision to educate at home gives more significant cause for concern than remaining in school. When a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will make it clear that this is not a decision we would ever recommend. We will liaise with other professionals to coordinate further discussion with parents/carers where possible. This will be particularly important where a child has SEND, has an EHCP or is vulnerable in that they have an assigned social worker. If a child has an EHCP the SENCO and caseworker will be consulted before agreement is given. Where the decision to home educate raises safeguarding concerns the DSL (or deputies) will seek further advice from Children's Social Care.

Where we feel that there is an additional cause for concern, the designated safeguarding lead will consider making a referral to the local authority in line with existing procedures. This will happen as soon as Inicio Educational Trust becomes aware of a parent's intention, or decision, to home educate.

Inicio Educational Trust will work with local authorities and, where possible, coordinate meetings with parents to seek to ensure EHE is being provided in the best interests of the child.

If parents want to admit their child to Inicio Educational Trust, we will follow our standard processes for in-year admissions applications.

## **20.4 Contingency planning**

Inicio Educational Trust will continue to operate as normally as possible. If restrictions in schools are needed to help contain the spread of the virus. We will refer to the contingency framework, which has been updated and outlines how schools should operate in the event of any restrictions.

## **21. Links with other policies**

This policy links to the following policies and procedures:

- Anti-Bullying
- Attendance and Punctuality
- Behaviour
- Complaints
- Health and Safety
- Relationships & Sex Education
- Safer Recruitment
- SEND
- Whistleblowing
- Online Safety
- Employment Manual

## **Links to other guidance**

Although this list is not exhaustive, this policy and procedure also accords with:

- Safeguarding Children and Safer Recruitment in Education (DFE April 2011 –Updated April 2012)
- Guidance for Safer Working Practice for Adults who work with Children and Young People in Education (February 2022)
- Working Together to Safeguard Children (July 2018 – Updated July 2022 – Currently under consultation)
- Keeping Children Safe in Education (September 2023)
- Early Years Foundation Stage (July 2023)
- Ofsted Education Inspection Framework (Updated July 2023)
- Inspecting Safeguarding in Early Years, Education and Skills settings (Updated September 2022)
- Advice for Schools on the Prevent Duty (DfE July 2015 – Updated April 2021)
- Disqualification under the Child Care Act 2006 (August 2018)
- Information sharing – Advice for practitioners providing safeguarding services to children, young people, parents, and carers (Updated July 2023)
- What to do if you think a child is being abused (DfE March 2015)
- Section 26 of the Counter Terrorism and Security Act (2015)
- Section 5B of the Female Genital Mutilation Act (2003) Section 74 of the Serious Crime Act 2015
- Female Genital Mutilation: Resource Pack (Updated February 2023)

- Teacher Status Checks – information for employers (Updated June 2021)
- Children Missing Education: Statutory Guidance for Local Authorities (September 2016)
- Child Sexual Exploitation – Definition, Guide and Annexes (DfE February 2017)
- Searching, screening and confiscation (DfE July 2022)
- The designated teacher for looked-after and previously looked-after children (DfE February 2018)
- Promoting the education of looked-after and previously looked-after children (DfE February 2018)
- Criminal Exploitation of children and vulnerable adults: County Lines guidance (Home Office, Feb 2020)
- General Data Protection Regulations (GDPR) (May 2018) and the latest Data Protection Act (2018)
- Data Protection Toolkit for Schools (Sept 2018)
- Mental Health and Behaviour in Schools (DfE November 2018)
- Safeguarding children and protecting professionals in early years settings: online safety guidance for practitioners (UK Council for Internet Safety, February 2019)
- Safeguarding children and protecting professionals in early years settings: online safety considerations for managers (UK Council for Internet Safety, February 2019)
- Governance Handbook (Updated October 2020)
- Teaching online safety in school' (DfE June 2019 – last updated January 2023)
- Education for a Connected World (June 2020)
- Reducing the need for restraint and restrictive intervention (June 2019)
- Relationships Education, Relationships and Sex Education (RSE) and Health Education (DfE, 2019 – Updated September 2021)
- Positive environments where children can flourish (2018 – Updated October 2021)
- Schools Covid-19 Operational Guidance (Updated February 2022)
- Safeguarding and remote education (Updated November 2022)
- When to call the police – Guidance for Colleges and Schools (NSPCC)
- Sharing nudes and semi-nudes: advice for education settings working with children and young people (23<sup>rd</sup> December 2020) Department for Digital, Culture, Media and Sport, UK Council for Internet Safety.
- [Keeping children safe in out-of-school settings: code of practice - GOV.UK \(October 2020\)](#)
- [Meeting digital and technology standards in schools and colleges - Guidance - GOV.UK \(Updated March 2023\)](#)
- Implementation of the Marriage and Civil Partnership (Minimum Age) Act 2022 - GOV.UK (February 2023)



## Key Definitions of Abuse and Neglect affecting children/young people

### Physical abuse

Physical abuse may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child/young person/young person. Where parents have smacked children, it will be abuse where the child has been injured/bruised or an implement used. Physical harm may also be caused when a parent or carer fabricates the symptoms of or deliberately induces illness in a child/young person/young person.

### Emotional abuse

Emotional abuse is the persistent emotional maltreatment of a child/young person, such as to cause severe and persistent adverse effects on the child/young person's emotional development. It may involve conveying to children/young people that they are worthless or unloved, inadequate or valued only insofar as they meet the needs of another person. It may feature age or developmentally inappropriate expectations being imposed on children/young people. These may include interactions that are beyond the child/young person's developmental capability, as well as overprotection and limitation of exploration and learning or preventing the child/young person participating in the normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying causing children/young people 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/young person, though it may occur alone.

### Sexual abuse

Sexual abuse involves forcing or enticing a child/young person to take part in sexual activities, not necessarily involving violence, including prostitution, whether or not the child/young person is aware of what is happening. The activities may involve physical contact, including penetrative (e.g. rape, buggery or oral sex) or non-penetrative acts. They may include non-contact activities, such as involving the child/young person is looking at or in the production of pornographic material or watching sexual activities or encouraging child/young person to behave in sexually inappropriate ways.

### Neglect

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

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

It may also include neglect of or unresponsiveness to a child/young person's basic emotional needs.

### Mental Health

The KCSIE 2023 makes a clear link between mental health and safeguarding, and stresses the role that schools play in detecting possible problems and supporting good mental wellbeing.

All staff should be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Education staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing, or at risk of developing, mental ill health.

Staff should immediately raise any mental health concerns which are *also* safeguarding concerns with the Designated Safeguarding Lead (DSL) or deputy, and follow the Safeguarding policy.

Staff must be aware of how adverse experiences, like abuse and neglect, can have a lasting impact on a child's mental health, behaviour and education.

Mental Health and Behaviour in Schools 2018 guidance sets out the best practice and Public Health England's guidance on promoting children and young people's emotional health and

We support our students' mental health, and governing bodies and proprietors ensure there are clear systems and processes in place for identifying possible problems, including routes to escalate concerns and clear referral and accountability systems.

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

Both CSE and CCE occur where a power imbalance is used to coerce, manipulate or deceive a child into sexual or criminal activity. Child sexual exploitation (CSE) involves exploitative situations, contexts, and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. 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

Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse. 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

- Staff should be aware of the key indicators of children being sexually exploited which can include:
- going missing for periods of time or regularly coming home late;
- regularly missing school or education or not taking part in education;
- appearing with unexplained gifts or new possessions;
- associating with other young people involved in exploitation;
- having older boyfriends or girlfriends;
- suffering from sexually transmitted infections;
- mood swings or changes in emotional wellbeing;
- drug and alcohol misuse; and
- displaying inappropriate sexualised behaviour.

Staff should also be aware that many children and young people who are victims of sexual exploitation do not recognise themselves as such.

There are three main types of child/young person sexual exploitation:

### **Inappropriate relationships:**

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

**Boyfriend/Girlfriend:**

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

**Organised exploitation and trafficking:**

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

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.

**Child-on-Child Abuse**

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

- bullying (including cyberbullying, prejudice-based and discriminatory bullying);
- abuse in intimate personal relationships between peers;
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse);
- sexual violence, such as rape, assault by penetration and sexual assault: (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone 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-nude images and or videos (also known as sexting or youth produced sexual imagery);
- up skirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group (and may also include an online element)

**Sharing Nudes and Semi-nudes**

In the latest advice for schools and colleges (UKCIS, 2020), this is defined as the sending or posting of nude or semi-nude images, videos or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple's Airdrop which works offline. Alternative terms used by children and young people may include 'dick pics' or 'pics'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated.

This advice does not apply to adults sharing nudes or semi-nudes of under 18-year olds. This is a form of child sexual abuse and must be referred to the police as a matter of urgency.

## **What to do if an incident comes to your attention**

Report it to your Designated Safeguarding Lead (DSL) or equivalent immediately. Your setting's child protection policy should outline codes of practice to be followed.

Never view, copy, print, share, store or save the imagery yourself, or ask a child to share or download – this is illegal.

If you have already viewed the imagery by accident (e.g. if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.

Do not delete the imagery or ask the young person to delete it.

Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).

Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

Do not say or do anything to blame or shame any young people involved.

Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).

### **For further information:**

Download the full guidance, sharing nudes and semi-nudes: advice for education settings working with children and young people (UKCIS, 2020)

## **FGM**

Female genital mutilation refers to procedures that intentionally alter or cause injury to the female genital organs for non-medical reasons. The practise is illegal in the UK.

FGM typically takes place between birth and around 15 years old; however, it is believed that the majority of cases happen between the ages of 5 and 8.

Risk factors for FGM include:

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

## **Symptoms of FGM**

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

Indications that FGM may have already taken place may include:

- Difficulty walking, sitting or standing and may even look uncomfortable.
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.

- Spending long periods of time away from a classroom during the day with bladder or menstrual problems.
- Frequent urinary, menstrual or stomach problems.
- Prolonged or repeated absences from school or college, especially with noticeable behaviour changes (e.g. Withdrawal or depression) on the girl's return reluctance to undergo normal medical examinations.
- Confiding in a professional without being explicit about the problem due to embarrassment or fear.
- Talking about pain or discomfort between her legs

The FGM mandatory reporting duty is a legal duty provided for in the FGM Act 2003 (as amended by the Serious Crime Act 2015). The legislation requires regulated health and social care professionals and teachers in England and Wales to make a report to the police where, in the course of their professional duties, they either: are informed by a girl under 18 that an act of FGM has been carried out on her; or observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18, and they have no reason to believe that the act was necessary for the girl's physical or mental health or purposes connected with labour or birth. Whilst all staff should speak to the designated safeguarding lead (or deputy) with regard to any concerns about female genital mutilation (FGM), there is a specific legal duty on teachers. If a teacher, in the course of their work in the profession, discovers that an act of FGM appears to have been carried out on a girl under the age of 18, the teacher must report this to the police.

**Complying with the duty does not breach any confidentiality requirement or other restriction on disclosure which might otherwise apply.**

**The duty is a personal duty which requires the individual professional who becomes aware of the case to make a report; the responsibility cannot be transferred.** The only exception to this is if you know that another individual from your profession has already made a report; there is no requirement to make a second.

The duty does not apply in relation to at-risk or suspected cases or in cases where the woman is over 18. In these cases, you should follow local safeguarding procedures. For more information, please see Working Together to Safeguard Children (in England) or Working Together to Safeguard People (in Wales) 2019 as appropriate, and the multi-agency statutory guidance on FGM.

**Where there is a risk to life or likelihood of serious immediate harm, professionals should report the case immediately to the police, including dialling 999 if appropriate.**

## **Serious violence**

All staff should be aware of the indicators, which may signal children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as being male, having been frequently absent or permanently excluded from school, having experienced child maltreatment and having been involved in offending, such as theft or robbery. Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.

## **Sexual Violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. 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. It is essential that all victims are reassured 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 sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

**What to do when a child/young person discloses abuse:**

- Stay calm and reassuring.
- Contact the DSL or Deputy DSL and the student's Head of Year.
- The DSL, Deputy or HoY will arrange a time and place to talk privately immediately after the child/young person has initiated contact.
- Explain that you cannot promise to keep what the child/young person tells you a secret - you may have to contact a social worker or the police.
- Don't make any other promises to the child/young person - the situation may cause you to react emotionally.
- Listen and reassure.
- Do not press for details - this is likely to need further and possibly extensive investigation. It is better for the child/young person if s/he does not have to repeat the details unnecessarily. This could also compromise a potential criminal investigation.
- Tell the child/young person that s/he was right to tell - that s/he is not to blame for the incident. Let the child/young person know that you understand how difficult it is to talk about such experiences. Thank the child/young person.
- As soon as possible afterwards, record your conversation with the child/young person. Remember, the child/young person's exact words. Record your statements to the child/young person.
- Record on the CPOMs system. This will alert the DSL and Deputy DSL and HoY. See below for further guidance on how to report a concern using this system.

**In Summary**

**Receive** – listen to what the student wants to tell you

**Reassure** – that they are believed, and their concern will be followed up

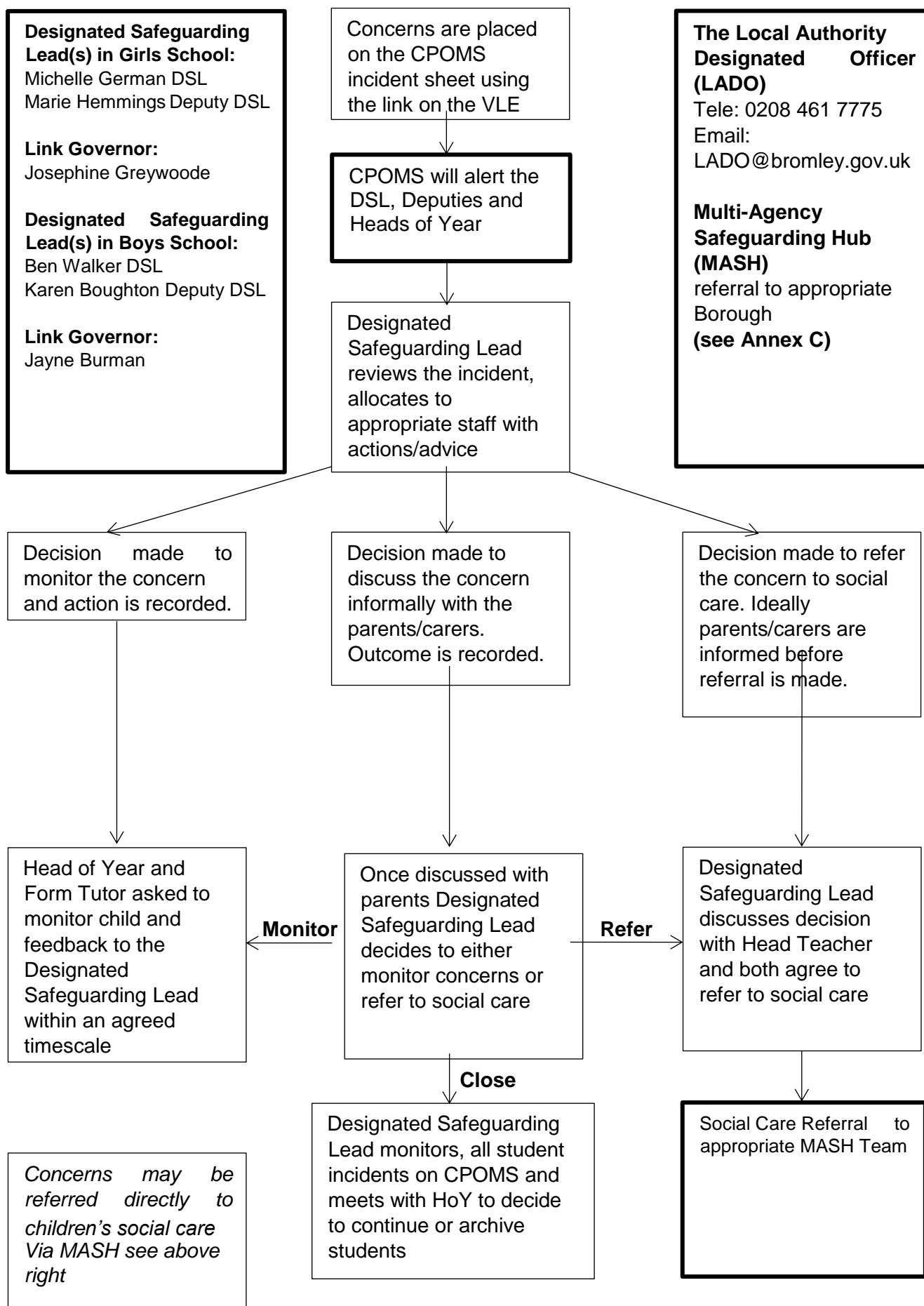
**React** – ask open questions and then speak to the DSL

**Record** – make a written record of the conversation and pass it to the DSL

**Refer** - via the DSL and using the local referral process

Note: A wide range of situations can fall into the category of "disclosure." Because it is impossible to know in advance what a child/young person will say, it is advisable to always follow these suggestions.

Many victims of child abuse say that having the first person they told be supportive was the first step in recovering from their experience.



Flow Chart for Raising Safeguarding Concerns



# Child Protection Online System (CPOMS)

## Restricted System Access – Non key users

Using CPOMS for the first time

Firstly every user needs to set their own password.

In order to ensure that all users change their passwords to something that is personal and secure we do not provide you with a password to begin with.

To create your first password please visit your school's CPOMS URL.

Click on the 'Forgotten your password or using CPOMS for the first time?' option (beneath the 'Login' button).

Next, input the email address which was supplied to us and click 'Reset Password'. This will then send you a unique hyperlink to your email address which will enable you to create your first CPOMS password.

Once you have created your first password, go back to your CPOMS log in page and enter your email address, password and click the 'Login' button.

## Restricted Access Dashboard

Once you are logged in to CPOMS without a key, you will be notified that: 'You are not signed in using a MeriLock key. Your access to CPOMS is restricted.'

Underneath this message will be the Alerts section. Here you will be able to see if you have been alerted to anything within CPOMS.

## Adding an Incident

To add an incident to the system click on the 'Add Incident' link at the top of the screen.

This will take you to the incident page where you can proceed to fill in all the required information.

## Instructions for adding an incident

- Firstly, select the child to whom you want to add the incident, begin typing the name in the student box at the top of the page. This will begin to filter through all the student names held within the system. Once you have selected a name, the box will turn grey. If you have selected the wrong name, click the red 'X' delete button to choose an alternative.
- Fill in the incident text box with all of the details about the incident which you are adding. This is a free text box so you can add as much or as little as needed. Be careful to be accurate and specific.
- After you have filled in all of the details of the incident, you need to select at least one category to assign it to (if there is an overlap you can select more than one).
- You can then choose to link in other students if more than one is involved in a particular incident. This will copy the incident to all students selected. You can also click to monitor the linked student under the same category, if necessary, and also share any documents attached to the incident.
- The 'Body map' feature allows you to apply numbered markers to a body map image to support your incident text.
- Following this, you can select a time and date. These will both default to the current time and date you are adding the incident, however, if you wish to change it to when the incident occurred you can do so here.
- Next, you can choose which members of staff you wish to alert. Begin typing a name and CPOMS will filter through all CPOMS registered staff members.
- Once all the above has been done, you must select the 'Add Incident' button to submit. This will then send out email alerts to all of the selected staff members telling them that they need to log in to CPOMS to look at a newly added incident.

## BROMLEY CHILDREN & YOUNG PEOPLE SERVICES CHILDREN'S SOCIAL CARE REFERRAL FORM



### Referral form to Children's Social Care or Disabled Children's Services

This form is to be used by all agencies when making a Child Protection referral, Child in Need referral or referring a Child to the Children with Disabilities Service in The London Borough of Bromley.

For guidance about the threshold criteria for referrals to Children's Social Care, please see the Bromley Safeguarding Children Board (BSCB) [Partnership model for providing services to support children and families in Bromley](#).

**If at any time you have reasonable concern that a child or young person has suffered significant harm or may be at immediate or acute risk of suffering significant harm, telephone Children's Social Care immediately and then complete this form to confirm your referral within 24 hours of your call.**

If a professional is unclear about whether to make a referral they should first consult with their designated Child Protection lead within their agency. Following this, advice can be sought from the Children's Social Care Referral and Assessment Team.

If a Common Assessment Framework (CAF) has been fully completed within the last three months for the child or young person, you can attach the completed CAF and complete Sections A to C of this form only. It is your responsibility to ensure that all of the basic information required is included as part of your referral. If you are relying on information from a completed CAF, please ensure this is up to date. Failure to do so will cause a delay in addressing the child's needs.

The referral form should be completed with as much relevant information as possible. If referring more than one child in the same household, a separate referral form is not needed for each child, but the referral must state which children are being referred for a service.

Consent should always be sought for a child in need referral and for relevant information to be shared.

In most child protection cases, parents should be informed that a referral is being made and what the concerns are about the child. However, there are exceptions where this is not appropriate, namely if to inform the parent / carer would:

- Place the child at increased risk of significant harm
- Place a member of staff at risk by the response it may prompt
- Lead to the risk of loss of evidence eg: someone destroying evidence of a crime, or influencing a child about a disclosure issue

### Bromley Children's Social Care Contact Details

Multi-Agency Safeguarding Hub (MASH)

Phone: 020 8461 7373 / 7379 / 7026

London Borough of Bromley

Civic Centre

E-mail: [mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)

St Blaise

Stockwell Close

Fax: 0208 313 4400

Bromley BR1 3UH

Emergency Duty Team (at weekends and outside normal working hours)

**Phone: 0300 303 8671**

Section A – Basic referral details (to be completed in all cases)				
Date of Referral		This is a:	<input type="checkbox"/> New Referral <input type="checkbox"/> Repeat Referral	
Do you consider the young person to be at risk of significant harm?	<input type="checkbox"/> Yes <input type="checkbox"/> No			
<b>If a child or young person is at immediate risk of significant harm, an immediate telephone referral to the Multi-Agency Safeguarding Hub (MASH) should be made. Do not delay whilst parental permission is sought</b>				
Family Name:		First name:		
D.O.B (or expected date of delivery):		Gender:	<input type="checkbox"/> Male <input type="checkbox"/> Female <input type="checkbox"/> Unborn	
Home Address				
Postcode:		Telephone:		
Current Address (if different from above):				
NHS Number:				
Child/young person's ethnicity:				
<b>White</b> <input type="checkbox"/> White British <input type="checkbox"/> White Irish <input type="checkbox"/> Traveller of Irish heritage <input type="checkbox"/> Gypsy/Roma <input type="checkbox"/> White any other background	<b>Black/Black British</b> <input type="checkbox"/> Caribbean <input type="checkbox"/> African <input type="checkbox"/> Any other Black background	<b>Mixed</b> <input type="checkbox"/> White & Black Caribbean <input type="checkbox"/> White & Black African <input type="checkbox"/> White & Asian <input type="checkbox"/> Any other mixed background	<b>Asian/Asian British</b> <input type="checkbox"/> Indian <input type="checkbox"/> Pakistani <input type="checkbox"/> Bangladeshi <input type="checkbox"/> Any other Asian background	<b>Other Ethnic Groups</b> <input type="checkbox"/> Chinese <input type="checkbox"/> Any other Ethnic Group <input type="checkbox"/> <b>NOT KNOWN</b>
If other, please specify:				
Child/young person's first language or preferred means of communication?		Is an interpreter or signer required?	<input type="checkbox"/> Yes <input type="checkbox"/> No	
What is the child/young person's nationality?		What is the child/young person's religion?		
Immigration Status:				
Is the child/young person disabled?	<input type="checkbox"/> Yes <input type="checkbox"/> No		Details:	

<b>Is the child/young person privately fostered?</b> When a child under the age of 16 (under 18 if disabled) is cared for for 28 days or more by someone who is not their parent or a close relative this is called a private fostering arrangement. It is a private arrangement between a parent and the carer. Close relatives are defined as grandparents, brother, sister, uncle or aunt (whether of full blood or half blood or by marriage) or step-parent (a parent's unmarried partner is not a step-parent in this context).		<input type="checkbox"/> Yes  <input type="checkbox"/> No
<b>Is the child/young person adopted?</b>	<input type="checkbox"/> Yes	<input type="checkbox"/> No
<b>Are you aware of any of the following difficulties being experienced by the child/young person and family?</b>		
Domestic Abuse	<input type="checkbox"/>	Parental Substance Misuse <input type="checkbox"/>
Parental Mental Illness	<input type="checkbox"/>	(Risk of Child) Sexual Exploitation <input type="checkbox"/>
(Risk of) Female Genital Mutilation	<input type="checkbox"/>	(Risk of) Radicalisation <input type="checkbox"/>
No recourse to public funds	<input type="checkbox"/>	

<b>Section B – Household details</b> If you are referring more than one child, please complete details of one of the children in detail in Section A. List the other children below.					
<b>Please list below the names and details of all children and adults who are currently residing with the child/ young person</b>					
Family name	First name	Date of Birth (DD/MM/YY)	Ethnicity	Relationship to child/ young person	Tick if you are also referring this child
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>
					<input type="checkbox"/>


### Section C – Parent/ Carer details

Name	Date of Birth (DD/MM/YY)	Relationship to child/ young person	Ethnicity (using ethnicities list on pg. 4)	First Language	Parental Responsibility
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
					<input type="checkbox"/> Yes <input type="checkbox"/> No
Is an interpreter/ signer required?		Mother	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
		Father	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
		Other main carers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
Are any of the main carers disabled?		Mother	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
		Father	<input type="checkbox"/> Yes	<input type="checkbox"/> No	
		Other main carers	<input type="checkbox"/> Yes	<input type="checkbox"/> No	

**Section D – Consent to make Referral to Children’s Social Care/Disabled Children Services**

*If a practitioner believes a child is at risk of significant harm they have a duty to make a referral to social care. These referrals do not require consent but it is good practice to inform an adult with parental responsibility that the referral is being made, UNLESS doing so would place the child at risk of significant harm or may lead to the loss of evidence, for example destroying evidence of a crime or influencing a child about a disclosure made. For all other referrals consent should always be sought from an adult with parental responsibility for the child/young person (or from the young person themselves if they are competent) before passing information about them to Children’s Social Care or Disabled Children Services*

Who has consent been obtained from?	Parent Person with parental responsibility Child/young person		
How has consent been obtained?	Verbal Written Not obtained Not applicable		
Date consent obtained:			
If consent obtained, what is the parent/carer/child/young person’s view of the referral?			
If no consent obtained, explain the risk of significant harm or the circumstances that have prevented you from obtaining consent:			

**Section E – Wider family network**

**Please list below the names and contact details of any other family members or significant adults in relation to this child or young person**

Name	
Relationship	
Address	
Postcode	
Contact number	
Any additional information	
Name	
Relationship	

<b>Address</b>	
<b>Postcode</b>	
<b>Contact number</b>	
<b>Any additional information</b>	

<b>Section F – Referrer details (to be completed in all cases)</b>	
<b>Name of Referrer</b>	
<b>Designation/ Title</b>	
<b>Department &amp; Agency</b>	
<b>Address</b>	
<b>Postcode</b>	
<b>Telephone</b>	
<b>Fax</b>	
<b>Email address</b>	



**Section G – Reason for referral (to be completed in all cases)**

In this section you need to tell us why you are referring this child/young person to us now.

If you have indicated that any child (or children) may be at risk of **significant harm** you need to tell us how you have come to your view and detail any significant incidents or events.

The following information will help us to assess what action may be necessary. Please give as much detail as you can to help us in our assessment.

What are you worried about?	What is going well for the child/young person?	What needs to change or would help this child/young person?
-----------------------------	--	---

--	--	--

**What support is already in place for the child/young person?**

--

**Has a Common Assessment Framework (CAF) been fully completed within the last 3 months?**

☐

Yes

☐

No

If you are working with a child or young person for whom a Common Assessment Framework (CAF) HAS BEEN **FULLY** COMPLETED WITHIN THE LAST 3 MONTHS please attach the completed CAF and any recent Delivery Plan and Review documents. It is your responsibility to ensure that all of the relevant information required is included as part of your referral, either on this form or in the completed CAF. Failure to do so will cause delay in addressing the child's needs.

#### Section H – Services working with this family

Please list below the details of other professionals/ agencies currently or recently involved with the child/ young person (Please include names and contact telephone numbers)

	Name	Address	Phone
GP			
Health Visitor			
Midwife			
School			
Early Years			
Other agency (please state)			
CAF Lead Professional (if applicable)			

Please send the completed form to [mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)

**IMPORTANT CONTACT NUMBERS WHEN MAKING A MASH REFERRAL**

#### **BROMLEY BOROUGH**

**MASH Team Telephone: 0208 461 7379/7026/7373/7014**

**Address:** Civic Centre, Stockwell Close, Bromley, BR1 3UH

**Email:** [mash@bromley.gov.uk](mailto:mash@bromley.gov.uk)

Emergency Out-of-Hours Service on 020 8464 4848

## **GREENWICH BOROUGH**

**MASH Team Telephone:** 020 8921 3172

**Address:** Greenwich Safeguarding Children Partnership, First Floor, The Woolwich Centre,  
35 Wellington Street, Woolwich SE18 6HQ

**Email:** mash-referrals@royalgreenwich.gov.uk

## **LEWISHAM BOROUGH**

**MASH Team Telephone:** 0208 314 6660

**Email:** mashagency@Lewisham.gov.uk

Out-of-Hours Duty Social Care Team on 020 8314 6000

**Roles and Responsibilities**Role of the Governing Body

It is the role of the governing body to ensure that the school meets its statutory duties with regard to preventing radicalisation.

Role of the Headteacher

It is the role of the Headteacher to:

- Ensure that the school and its staff respond to preventing radicalisation on a day-to-day basis
- Ensure that the school's curriculum addresses the issues involved in radicalisation
- Ensure that staff conduct is consistent with preventing radicalisation

Role of Designated Safeguarding Lead

It is the role of the designated safeguarding lead to:

- Ensure that staff understand the issues of radicalisation, are able to recognise the signs of vulnerability or radicalisation and know how to refer their concerns
- Receive safeguarding concerns about children and young people who may be vulnerable to the risk of radicalisation or are showing signs of radicalisation
- Make referrals to appropriate agencies with regard to concerns about radicalisation
- Liaise with partners, including the local authority and the police
- Report to the governing body on these matters

Role of staff

It is the role of staff to understand the issues of radicalisation, to recognise the signs of vulnerability or radicalisation and know how to refer their concerns.

Curriculum

We are committed to ensuring that our students are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. We encourage our students to be inquisitive learners who are open to new experiences and are tolerant of others.

Heads of Year and faculty teams are responsible for identifying and developing opportunities for spiritual, moral, social and cultural opportunities (skills, knowledge, and experiences) within the tutorial programmes. Heads of Departments and subject teams are responsible for identifying and developing opportunities for spiritual, moral, social and cultural opportunities (skills, knowledge, and experience) within their subject areas, incorporating these into schemes of work; these are monitored as rigorously as all aspects are during lesson observations. These values support the development of the whole student as a reflective learner within a calm, caring, happy and purposeful atmosphere.

Teaching the schools' core values alongside fundamental British Values supports quality teaching and learning while making a positive contribution to the development of a fair, just and civil society. We ensure that partisan political views are not promoted in the teaching of any subject in the school and where political issues are brought to the attention of students; reasonable and practical steps are taken to offer a balanced presentation of opposing views to students.

We also have a duty under the Counter-Terrorism Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.

### Internet Safety

The internet provides children and young people with access to a wide range of content, some of which is harmful. Extremists use the internet, including social media, to share their messages. The filtering systems used in our schools blocks inappropriate content, including extremist content.

We also filter out social media, such as Facebook. Searches and web addresses are monitored, and the IT technicians will alert senior staff where there are concerns and prevent further access when new sites that are unblocked are found. Where staff, students or visitors find the unblocked extremist content, they must report it to a senior member of staff. Students and staff know how to report Internet content that is inappropriate or of concern.

### Staff Training

Staff are given the training to help them understand the issues of radicalisation, to recognise the signs of vulnerability or radicalisation and know how to refer their concerns. This information also forms part of induction safeguarding training. Staff are updated as necessary in safeguarding briefings.

### Safer Recruitment

We ensure that the staff we appoint to the school are suitable, our recruitment procedures are rigorous (see Safer Recruitment and Selection Policy for guidance), and we follow the statutory guidance published in part 3 of Keeping Children Safe in Education 2022). Vetting and barring checks are undertaken on relevant people, including governors and volunteers.

### Visitors

Visitors to the school are made aware of our safeguarding and child protection policies on arrival at the school and are given information about what to do if they are concerned about any aspect of child welfare.

Visitors who are invited to speak to students will be informed about our preventing extremism procedures, and relevant vetting checks are undertaken. We undertake due diligence to ensure that visiting speakers and their materials are appropriate. Speakers will be supervised at all times and will not be allowed to speak to children without a member of staff being present.

Staff must not invite speakers into school without first obtaining permission from a member of the Leadership Team.

### 'No platform for extremists'

The school is vigilant to the possibility that out-of-hours hire of the school premises may be requested by people wishing to run an extremist event. The school does not accept bookings from individuals or organisations that are extremist in their views.

### Signs of vulnerability

There are no known definitive indicators that a young person is vulnerable to radicalisation, but there are a number of signs that together increase the risk. Signs of vulnerability include:

- underachievement
- being in possession of extremist literature
- poverty
- social exclusion
- traumatic events
- global or national events
- religious conversion
- change in behaviour
- extremist influences
- conflict with family over lifestyle
- confused identity
- victim or witness to race or hate crimes
- rejection by peers, family, social groups or faith

## Recognising Extremism

Early indicators of radicalisation or extremism may include:

- showing sympathy for extremist causes
- glorifying violence, especially to other faiths or cultures
- making remarks or comments about being at extremist events or rallies outside the school
- evidence of possessing illegal or extremist literature
- advocating messages similar to illegal organisations or other extremist groups
- out of character changes in dress, behaviour and peer relationships (but there are also very powerful narratives, programmes and networks that young people can come across online so involvement with particular groups may not be apparent.)
- secretive behaviour
- online searches or sharing extremist messages or social profiles
- intolerance of difference, including faith, culture, sex, race or sexuality
- graffiti, artwork or writing that displays extremist themes
- attempts to impose extremist views or practices on others
- verbalising anti-Western or anti-British views
- advocating violence towards others

## Referral Process

Staff and visitors to the school must refer all concerns about children and young people who show signs of vulnerability or radicalisation to the Designated Safeguarding Lead using the usual methods for reporting other safeguarding concerns.

Any prejudice, discrimination or extremist views, including derogatory language, displayed by students or staff will always be challenged and where appropriate dealt with in line with our Behaviour and Anti Bullying Policy for students, or the Staff Code of Conduct.

We will share information with the First Response Team and the Bromley Police Prevent team when appropriate. We will also work with the Channel Panel in relevant circumstances.

Channel is a key element of the Prevent Strategy. It is a multi-agency approach to protect people at risk of radicalisation. Channel uses existing collaboration between local authorities, statutory partners, the police and the local community to identify individuals at risk of being drawn into terrorism, assess the nature and extent of that risk and develop the most appropriate support for the individuals concerned. When there are significant concerns about a student, the Designated Safeguarding Lead in liaison with the Headteacher will make a referral to the appropriate body.

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

- Bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- 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)
- Abuse in intimate relationships between peers
- Sexual violence and sexual harassment
- Causing someone to engage in sexual activity without consent
- Up skirting which typically involves taking a picture under a person's clothing without their permission, to obtain sexual gratification or cause the victim humiliation, distress or alarm
- Abuse in intimate personal relationships between peers
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Initiation/hazing type violence and rituals, which 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

### **Provide appropriate and regularly updated staff training**

It's vital to know how to identify child-on-child abuse early to prevent it from escalating. Provide staff with regularly updated and appropriate safeguarding training that enables them to understand:

- Their role in preventing child-on-child abuse
- How to identify the indicators of abuse
- What to do if they have a concern about a child
- How to respond to a report of abuse
- How to offer support to the victim(s) and alleged perpetrator(s)
- Where to go if they need support
- That children can abuse other children inside and outside of school, as well as online, and that online abuse can take the form of:
  - Abusive, harassing and misogynistic messages
  - Non-consensual sharing of indecent nude and semi-nude images and/or videos, especially around chat groups
  - Sharing of abusive images and pornography to those who don't want to receive such content
- That they need to maintain an attitude of 'it could happen here'
- That even if there are no reports in your school, it doesn't mean it's not happening
- The importance of challenging inappropriate and abusive behaviour (see more on this below)
- That girls are more likely to be victims and boys are more likely to be perpetrators

### **Creating a supportive environment in school and minimising the risk of child-on-child abuse**

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images

- Be vigilant to issues that particularly affect different sexes – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting system
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
  - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
  - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
  - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
    - i. Children can show signs or act in ways they hope adults will notice and react to
    - ii. A friend may make a report
    - iii. A member of staff may overhear a conversation
    - iv. A child’s behaviour might indicate that something is wrong
  - That certain children may face additional barriers to telling someone because of their vulnerability, disability, sex, ethnicity and/or sexual orientation
  - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
  - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
  - That they should speak to the DSL if they have any concerns

The MAT has clear behaviour policies and measures in place to prevent all forms of bullying. This also includes prejudice-based and/or discriminatory bullying. The Safeguarding and child protection policy outlines the procedures we have in place to minimise the risk of child-on-child abuse.

Staff are expected to challenge inappropriate behaviours by, for example:

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up
- Not tolerating or dismissing sexual violence or sexual harassment as ‘banter’, ‘part of growing up’, ‘just having a laugh’ or ‘boys being boys’

Dismissing inappropriate behaviour risks leading to:

- A culture of unacceptable behaviours
- An unsafe environment for children
- A culture that normalises abuse, leading to pupils accepting it as normal and not coming forward to report it

There are clear sanctions in place to respond effectively to incidents and the MAT has a zero-tolerance approach to child-on-child abuse. See Behaviour policy.

All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report



## **Preventative curriculum programme Address issues associated with child-on-child abuse**

Our curriculum ensures children are taught about safeguarding, including how to stay safe online. Our curriculum also tackles (in an age-appropriate and inclusive way) issues such as:

- Healthy and respectful relationships
- What respectful behaviour looks like
- Consent
- Sex based roles, stereotyping and equality
- Body confidence and self-esteem
- Prejudiced behaviour
- Sexual violence and sexual harassment

This is based on the DfE's [guidance](#) on sexual violence and sexual harassment and the DfE's [statutory RSE guidance](#).

### **Consider your context and work with local partners**

Child-on-child abuse incidents and/or inappropriate behaviours can be associated with factors outside of the school. We consider carefully the context when preventing and dealing with such incidents.

For example, when tackling violence, it's important to:

- Understand the problems that young people are facing both in school and in their local community
- Consider possible avenues of support
- Work with local partners (who may have valuable information, resources or expertise) such as the police and youth offending teams. Your safeguarding partners may also be able to provide support

### **Seek specialist support**

It is important to consider carefully if external input is required, particularly when approaching sexual violence and sexual harassment as part of preventing child-on-child abuse. Specialist organisations may be able to support by training staff, teaching children and/or providing them with support.

Organisations include:

- [NSPCC](#)
- [UK Safer Internet Centre](#)
- [Brook](#)
- [The Anti-Bullying Alliance](#)

## **Section 1: Allegations that may meet the harms threshold**

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

We will deal with any allegation of abuse quickly, in a fair and consistent way that provides effective child protection while also supporting the individual who is the subject of the allegation. (However, 'fear of causing offense' should never be a reason for failing to rigorously investigate allegations). A 'case manager' will lead any investigation. This will be the Headteacher, or the Chair of Governors where the Headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused 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 there 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.

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 individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the multi-academy trust

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

### **Definitions for outcomes of allegation investigations**

**Substantiated:** There is sufficient evidence to prove the allegation

**Malicious:** There is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

**False:** There is sufficient evidence to disprove the allegation

**Unsubstantiated:** There is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

**Unfounded:** To reflect cases where there is no evidence or proper basis which supports the allegation being made

## **Procedure for dealing with allegations**

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- 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.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
- 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, for example trade union representative.
- 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 (only in relation to their child – no information will be shared regarding the staff member).

- 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 school 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 teachers and all contracted staff**

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, 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 LADO as required.
- 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.

### **Timescales**

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

### **Specific actions:**

#### **Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children's social care services.

## **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

## **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.

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.

## **Unsubstantiated, unfounded, false or malicious reports**

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

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

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

## **Confidentiality and information sharing**

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.
- What, if any, information can be reasonably given to the wider community to reduce speculation.
- How to manage press interest if, and when, it arises.

## **Record-keeping**

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

## References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

## Learning lessons

After any cases where the allegations are *substantiated*, the case manager 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.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

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

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

## **Section 2: concerns that do not meet the harm threshold**

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education. This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

### **Definition of low-level concerns**

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school 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 designated officer at the local authority

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

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

### **Sharing low-level concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system



## **Responding to low-level concerns**

If the concern is raised via a third party, the Headteacher will collect evidence where necessary by speaking:

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

The Headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's code of conduct. Where the member of staff is supply staff or a contractor this will be notified to their employers.

## **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

## **References**

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance