

“Safeguarding”

2	<b><u>Statutory and required – centrally provided template for adoption without amendment:</u> these are policies which it is statutory for schools to have.</b>
---	--

*Marked copy, new text indicated in **BROWN**  
Insertions for schools to make on yellow background*

# Child Protection and Safeguarding Policy (Updated **August 2020**)

In line with ‘Keeping Children Safe in Education’ **2020**



**SCHOOL NAME**

This policy was updated on **.....**

The policy must be reviewed and updated at least every 12 months.

(Name of organisation/school)..... recognises its responsibility for safeguarding and child protection.

# Table of Contents **changed page references**

<b>Part 1</b> .....	4
1. Introduction .....	4
2. Terminology .....	5
3. Aims.....	6
4. The roles and responsibilities of school staff.....	7
5. What school staff need to know .....	8
6. What school staff should look out for .....	10
7. What school staff should do if they have concerns about a child .....	10
8. What school staff should do if a child is in danger or at risk of harm .....	11
9. What school should do if they have concerns about another staff member .....	11
10. What school staff should do if they have concerns about safeguarding practices within the school.....	11
<b>Part 2</b> .....	12
11. Key personnel at our school: .....	12
12. Roles and responsibilities.....	15
13. Supporting Children .....	19
14. Confidentiality.....	20
15. Supporting Staff .....	20
16. Allegations against staff.....	21
17. Whistleblowing .....	22
18. Physical Intervention/Positive Handling .....	24
19. Anti-Bullying.....	24
20. Attendance.....	24
21. Health & Safety .....	25
22. Children with Special Educational Needs.....	25
23. Types of abuse and neglect.....	26
24. Specific safeguarding issues.....	27
25. Online safety .....	29
26. Opportunities to teach safeguarding.....	30
27. Allegations of abuse made against other children (peer on peer abuse).....	30
28. Dealing with Disclosures .....	32
29. Record Keeping .....	33
<b>Appendix A – Definitions</b> .....	34
<b>Appendix B – Allegations Flowchart</b> .....	46
<b>Appendix C – Actions where there are concerns about a child</b> .....	47
<b>Appendix D – Child Protection Records held within Settings</b> .....	50
<b>Appendix E – Safer Recruitment</b> .....	55
<b>Appendix F – Briefing Sheet for temporary and supply staff</b> .....	57

**Appendix G - Supplementary DfE guidance Coronavirus outbreak.....58**

**Appendix H - Using IT to communicate – some basic considerations.....65**

**Appendix I - [Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers.....67](#)**

DRAFT

## Overview

This document sets out the procedures for ODST schools in relation to Safeguarding and Child Protection. The content remains substantively the same as the model Local Safeguarding Children Boards documents. It has been amended where necessary to reflect the independent status of ODST as a Multi-Academy Trust. It is compliant with 'Keeping Children Safe in Education' 2020 and the required statutory content so is applicable to all ODST schools.

This policy also reflects DfE guidance dated 27<sup>th</sup> March 2020 in respect of [Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers](https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers) and later guidance on the partial re-opening of schools from 1<sup>st</sup> June 2020.

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers> and subsequent guidance issued.

**This policy has been updated to reflect changes in KCSIE 2020:**

- **Legislative changes e.g. reflecting mandatory Relationship Education, Relationship and Sex Education and Health Education from September 2020**
- **additional information to support schools protect children e.g. mental health, domestic abuse, child criminal and sexual exploitation and county lines.**
- **clarifications to help the sector better understand and/or follow guidance**

Whilst acknowledging the pressure that schools are under, it remains essential that as far as possible they continue to be safe places for children. This policy supports local governing bodies, proprietors, senior leadership teams and designated safeguarding leads (DSLs) so they can continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools might consider safeguarding policy and process differently when compared to business as usual (**Appendix G**).

The way schools are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children must always continue to come first
- if anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

ODST takes a whole Trust approach to safeguarding. This allows that any new policies and processes in response to COVID-19 are not weakening its approach to safeguarding or undermining this child protection policy.

## Part 1

### 1. Introduction

This policy has been developed in accordance with the principles established by the 'Children Act' 1989; and in line with the following:

- “Working Together to Safeguard Children 2018”
- **“Keeping Children Safe in Education”- statutory guidance for schools and further education colleges (Sept 2020)**
- DBS Guide to Child Workforce Roles (2018)
- Safeguarding Vulnerable Groups Act 2006.
- Children Missing Education; Statutory Guidance for Local Authorities Sept 2016
- Statutory Guidance issued under section 29 of the Counter-Terrorism and Security Act 2015
- Sexual Violence and Sexual Harassment between Children – May 2018
- The Equality Act 2010
- The United Nations Convention on the Rights of the Child (UNCRC)
- ‘Framework for the Assessment of Children in Need and their Families’ 2000
- ‘What to do if you are worried a Child is being Abused’ 2015
- Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018

The Local Governing Body (LGB), under powers delegated by the Trustees of the Oxford Diocesan Schools Trust (ODST), takes seriously its responsibility under paragraph 7 of the Schedule to the Education (Independent School Standards)(England) Regulations 2014 and under “Working together” to safeguard and promote the welfare of children and to work together with other agencies to ensure adequate arrangements exist within the school to identify, and support those children who are suffering harm or are likely to suffer harm.

We believe clear governance and leadership is central to embed a safeguarding culture and recognise that all staff and governors have a full and active part to play in protecting our pupils from harm, and that the child’s welfare is our paramount concern.

Our school will provide a safe, caring, positive and stimulating environment that promotes the social, physical and moral development of the individual child free from discrimination or bullying where children can learn and develop happily. Trustees recognise that as well as threats to the welfare of children from within their families, children may be vulnerable to abuse or exploitation outside their homes and from other children. Staff will remain vigilant and alert to these potential risks.

This policy applies to all staff, governors and volunteers working in our school and to pupils in our care. **This policy has been written in line with ‘Keeping Children Safe in Education’ 2020.**

Governors will ensure all staff at the school have read and understood their responsibilities pertaining to Part 1 and Annex A of Keeping Children Safe in Education Sept **2020** and have an auditable system in place to evidence this. In addition, all staff are required to read and adhere to the Staff Code of Conduct which governs behaviours expected of them as well as having an understanding of the Behavioural Policy for children and our Attendance Policy.

## 2. Terminology

- **Safeguarding and promoting the welfare of children is defined for the purposes of this policy as 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; and taking action to enable all children to have the best outcomes;**

- **Child protection** refers to the processes undertaken to meet statutory obligations laid out in the [Children Act 2004](#) and associated guidance (see [Working Together to Safeguard Children: A guide to inter-agency working to safeguard and promote the welfare of children – July 2018](#)) in respect of those children who have been identified as suffering, or being at risk of suffering harm;
- **Staff** refers to all those working for or on behalf of the school, full time or part time. In this specific context, it applies to those in both a paid and voluntary capacity and those working at the school for a third party;
- **Child** refers to all children and young people who have not yet reached their 18th birthday. Some children have additional vulnerabilities e.g. those looked after/previously looked or with a disability, these vulnerabilities do not change the definition but do place an additional responsibility on schools to have regard for their specific context and the additional/enhanced support they offer:
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents;

### 3. Aims

Trustees' aims in adopting this policy are:

- To support children and young peoples' development in ways that will foster security, confidence and resilience, free from discrimination.
- **To prevent impairment of children's mental and physical health or development**
- To provide an environment in which children and young people feel safe, secure, valued and respected and feel confident that they know how to approach adults if they are in difficulties.
- To ensure all teaching and non-teaching staff, are aware of the need to safeguard and promote the wellbeing of children. Identifying the need for support early to promote well-being and promptly reporting cases of actual or suspected abuse.
- To provide a systematic means of monitoring children known or thought to be at risk of harm and ensure we, the school, contribute to assessments of need and support plans for those children.
- To acknowledge the need for effective and appropriate communication ensuring staff know how and when to share information to protect children in a way that is legal and ethical.
- To ensure ODST schools have a clear system for communicating concerns and models for open communication between children, teachers, parents and other adults working with children.
- To underpin a structured procedure within each school, which will be followed by all members of the school community in cases of suspected abuse.
- To ensure each school has robust systems in place which accurately records safeguarding and child protection concerns, which are clearly understood by staff and adhered to. Actions taken to address concerns and outcome achieved are clearly and accurately recorded and these records are appropriately stored.
- To develop effective working relationships, guided by local documentation detailing safeguarding thresholds and **local** guidance, with all other agencies involved in safeguarding and promoting the needs of children at our schools.
- To ensure that all staff appointed within our schools, have been through a 'safer recruitment' process and understand the principles of safer working practices as set out in

the ODST Staff Code of Conduct, which stipulates their duty to challenge and report where behaviours of colleagues may have stepped outside of agreed safe practices.

- To provide clarity to other community users of our facilities with regard to our expectations of how they should maintain a safe environment which supports children's welfare and development.

#### 4. The roles and responsibilities of school staff

Our staff team are particularly important as they are able to identify concerns early, provide help for children, and prevent concerns from escalating.

- **All our** school staff have a responsibility to provide a safe environment in which children can learn;
- The school has a designated safeguarding lead who provides support to our staff members to carry out their safeguarding duties and to liaise closely with other services such as children's social care;
- All our staff are equipped to identify children who may benefit from early help. Staff know in the first instance to discuss their concerns with the designated safeguarding lead, and understand they may be required to support other agencies and professionals in assessments for early help;
- The Teachers' Standards 2012 state that teachers, including Headteachers, should safeguard children's wellbeing and maintain public interest in the teaching professions as part of their professional duties.

## 5. What school staff need to know

All our staff members are aware of the systems within our school which support safeguarding, these are explained to them as part of their induction and include:

- This child protection and safeguarding policy;
  - **'Keeping Children Safe in Education' 2020, particularly part 1 and annex A;**
  - The ODST staff code of conduct held on the ODST website (sometimes called staff behaviour policy);
  - The role and information about the role of the DSL including, the identity of the Designated Safeguarding Lead (DSL) and any deputies;
  - ODST Whistleblowing policy;
  - The school and Trust's Behavioural Policy;
  - The Trust's Attendance Policy – particularly for those "missing education"
  - Procedures for managing allegations about staff or volunteers;
  - What to do if they have a concern about a child.
- **All staff members receive appropriate safeguarding and child protection training at induction and in addition, receive safeguarding and child protection updates, when required but at least annually, to provide them with relevant skills and knowledge to be able to safeguard the children in our setting effectively;**
  - **All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.**
  - **All staff are made aware of the early help process and understand their role in this. This includes staff being able to identify emerging problems, liaising with our designated safeguarding lead, sharing information<sup>1</sup> with other professionals to support early identification and assessment and, in some cases, where appropriate, acting as the lead professional in undertaking any early help assessment;**
  - **All staff are aware of the process for making child protection referrals to social care and statutory assessments that may follow, under the Children Act 1989. They also understand the role that they may have to play in such assessments;**
  - **All staff know what to do if a child tells them he/she is being abused or neglected. Staff understand how to maintain an appropriate level of confidentiality, whilst at the same time understand the requirement around sharing information appropriately with the designated safeguarding lead and other relevant professionals;**
  - **All staff are aware that there are children potentially at greater risk of harm who need a social worker (Child in Need and Child Protection Plans). Due to safeguarding or welfare needs and that their experiences may leave them vulnerable to further harm or educational disadvantage. Where children need a social worker this will inform decisions about safeguarding and promoting welfare;**
  - **Staff will never promise a child that they will not tell anyone about the allegation/disclosure that the child has made, as this may ultimately not be in the best interests of the child.**

---

<sup>1</sup> Information sharing: Advice for practitioners providing safeguarding services to children, young people, parents and carers - July 2018



- **All staff know they should not use personal devices such as mobile phones or cameras to take photos or videos of pupils and will use school provided equipment for this purpose. Other specific events which involve photographs of pupils (i.e. press, external providers etc.) will only occur with the permission of the headteacher and designated person. Staff are also aware through the 'Code of Conduct' that mobile phones should NOT be used in class or while on duty, e.g. play and lunchtimes. School policies for Early Years Foundation Stage reflect the statutory requirements<sup>2</sup> on the use of cameras and mobile phones.**
- **All staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. The Information Commissioner's Office (ICO) includes ICO GDPR FAQs and guidance (The Data protection toolkit for schools <https://www.gov.uk/government/publications/data-protection-toolkit-for-schools> has guidance to support schools with data protection activity, including compliance with the GDPR.)**

DRAFT

---

<sup>2</sup> [Statutory framework for the early years foundation stage](#)

## 6. What school staff should look out for

- All staff members are aware of the signs of abuse and neglect so they can identify children who may need help or protection (see part 2 of this policy for the definitions);
- All staff members have an awareness of safeguarding issues that can put children at risk of harm and of indicators and behaviours that are linked to children being in danger (see paragraph 24 of this policy for more information);
- All staff members know that children can abuse other children (see paragraph 27 of this policy);
- **All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, but especially the designated safeguarding lead (and deputies) should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence. Advice from the DfE, provides more information on understanding and identifying abuse and neglect, e.g. <https://www.gov.uk/government/publications/what-to-do-if-youre-worried-a-child-is-being-abused--2>;**

## 7. What school staff should do if they have concerns about a child

- If staff members have any **concerns** about a child (as opposed to a child being in immediate danger) they will need to decide what action to take. Where possible, there should be a conversation with the designated safeguarding lead to agree a course of action, although any staff member can make a referral to children's social care. Other options could include referral to specialist services or early help services and should be made in accordance with the referral threshold set by the relevant Local Authority [Alison.beasley@oxfordshire.gov.uk](mailto:Alison.beasley@oxfordshire.gov.uk) and [https://www3.rbwm.gov.uk/info/200112/children\\_and\\_families/824/child\\_protection](https://www3.rbwm.gov.uk/info/200112/children_and_families/824/child_protection)
- If anyone other than the designated safeguarding lead makes the referral they should inform the designated safeguarding lead, as soon as possible;
- If after a referral the child's situation does not appear to be improving the designated safeguarding lead (or the person that made the referral) should press for re-consideration to ensure their concerns have been addressed and, most importantly, that the child's situation improves;
- If early help is appropriate the designated safeguarding lead should support the staff member in liaising with other agencies and setting up an inter-agency assessment as appropriate;
- If early help and or other support is appropriate the case should be kept under constant review and consideration given to a referral to children's social care if the child's situation doesn't appear to be improving;
- If a teacher, during their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

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

**If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.** Anyone can make a referral. Where referrals are not made by the designated safeguarding lead, they should be informed, as soon as possible, that a referral has been made.

9. What school should do if they have concerns about another staff member **(including supply staff and volunteers)**

If staff members have concerns about another staff member, then this must be referred to the Headteacher/ Principal. Where there are concerns about the Headteacher or Principal this should be referred to the Chair of Governors. Staff may consider discussing any concerns with the school's designated safeguarding lead and make any referral via them. Full details can be found in Part 2 of this guidance.

10. What school staff should do if they have concerns about safeguarding practices within the school

- All our staff and volunteers should feel able to raise concerns about poor or unsafe practice and potential failures in the school or college's safeguarding regime and that such concerns will be taken seriously by the senior leadership team;
- Appropriate whistleblowing procedures, which are suitably reflected in staff training and staff behaviour policies are in place for such concerns to be raised with the school's senior leadership team;
- Where a staff member feels unable to raise an issue with the Headteacher or Chair of Governors or feels that their genuine concerns are not being addressed, they should approach the ODST HR Team on 01865 208 200.
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call: 0808 800 5000 – line is available from 8:00 AM to 8:00 PM, Monday to Friday and Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk); for children under 18: Childline 0800 1111.

## Part 2

### 11. Key personnel at our school:

	Name	Contact details
The designated safeguarding lead for child protection in this school	x	
Additional Designated Safeguarding Lead(s):	x	
Head Teacher:	x	
Designated Teacher for looked after, or previously looked-after children	x This is not a requirement to be included in this policy; however, the post must be appointed to for each school and the name included in their school's key personnel.	
Nominated Safeguarding Governor:	x	
Chair of Governors:	x	

#### Local Authorities' Contacts

Clinical commissioning teams within the Local Authorities' areas:

Oxfordshire Clinical Commissioning Group

Jubilee House,

John Smith Drive,

Oxford Business Park South,

Oxford

OX4 2LH 01865 336800

[oxon.gpc@nhs.net](mailto:oxon.gpc@nhs.net)

East Berkshire CCG

King Edward VII Hospital

St Leonard's Road

Windsor

SL4 3DP

Chief of Police within the LAs:

The Chief Constable

Thames Valley Police Kidlington

Headquarters South, Oxford Road  
OX5 2NX Kidlington  
Oxfordshire England  
01865 841148

[thamesvalley.police.uk](http://thamesvalley.police.uk)

<https://www.thamesvalley.police.uk/>

	RBWM	Oxfordshire
Local Authority Designated Officers (LADO):	Local Authority Designated Officer (LADO) Achieving for Children Richmond, Kingston and Windsor & Maidenhead LADO Service	Alison Beasley (LADO) 01865 815956 or 07833 436649 <a href="mailto:Alison.beasley@oxfordshire.gov.uk">Alison.beasley@oxfordshire.gov.uk</a>
		LADO team 01865 810603 <a href="mailto:Lado.safeguarding@oxfordshire.gov.uk">Lado.safeguarding@oxfordshire.gov.uk</a>
	Tel: <b>07774 332675</b> .  New referrals please call: 020 8891 7370  Email: <a href="mailto:LADO@achievingforchildren.org.uk">LADO@achievingforchildren.org.uk</a>	Donna Crozier (Asst Designated Officer) 01865 816382 or 07901 331799 <a href="mailto:Donna.crozier@oxfordshire.gov.uk">Donna.crozier@oxfordshire.gov.uk</a>
		Sandra Pasquet (Asst Designated Officer) 01865 323457 or 07785 453264 <a href="mailto:Sandra.pasquet@oxfordshire.gov.uk">Sandra.pasquet@oxfordshire.gov.uk</a>
Education Safeguarding Advisor	None	None
Education Safeguarding Advisory Service	Child Protection Coordinator: 01628 683202	01865 810603
MASH/ First Response Team (including Early Help, Channel) –	01628 685995 Out of Hours Tel: 01344 786543	Katrina Johnson 0345 050 7666 North: 0345 2412703 Central: 0345 2412705 South: 0345 2412608
Equalities Manager - Bullying/Prevent Lead for schools	Prevent Lead: David Scott <a href="mailto:david.scott@rbwm.gov.uk">david.scott@rbwm.gov.uk</a> Tel: 01628 796748.	Clare Pike (Lead for Learner Engagement) Email: <a href="mailto:clare.pike@oxfordshire.gov.uk">clare.pike@oxfordshire.gov.uk</a>
Children's Services, Out of Hours:	MASH 01628 683150  01628 685995  Out of Hours Tel: 01344 786543	08450 507666

<p>Clinical commissioning partner and police (see also above)</p>	<p>East Berkshire CCG King Edward VII Hospital St Leonard's Road Windsor SL4 3DP</p>	<p>Oxfordshire Clinical Commissioning Group Jubilee House, John Smith Drive, Oxford Business Park South, Oxford OX4 2LH 01865 336800</p>
	<p>The Chief Constable Thames Valley Police Kidlington Headquarters South, Oxford Road OX5 2NX Kidlington Oxfordshire England 01865 841148 <a href="http://thamesvalley.police.uk">thamesvalley.police.uk</a> <a href="https://www.thamesvalley.police.uk/">https://www.thamesvalley.police.uk/</a></p>	

Other Contacts	
RU Safe? (Barnardos - Child Sexual Exploitation Service)	01494 461112
Thames Valley Police	101 (999 in case of emergency)
<a href="#">Oxfordshire Family Information Service</a>	
NSPCC	0800 800 5000
Childline	0800 11 11
Kidscape Bullying Helpline	0845 1205 204
Female Genital Mutilation	0800 0283550 <a href="mailto:fgmhelp@nspcc.org.uk">fgmhelp@nspcc.org.uk</a>
Samaritans	0845 790 9090
<a href="#">CEOP</a> (Child Exploitation and Online Protection)	0800 11 11 (Childline)
Foreign and Commonwealth Office (Forced Marriages Section)	0207 008 0151
Crimestoppers	0800 555 111

## 12. Roles and responsibilities

All schools must nominate a senior member of staff to coordinate child protection arrangements and this person is named in this policy guidance. The school ensures that the designated safeguarding lead or a deputy will be on site at all times that the school is functioning.

### The Local Governing Body (LGB)

The LGB of ..... under its delegated powers understands and fulfils its statutory safeguarding responsibilities and undertakes to regularly review safeguarding related policies and procedures that operate in the school.

The LGB have a crucial role in monitoring and challenging staff on the effectiveness of safeguarding arrangements.

The LGB will ensure that:

- All members of the governing body understand and fulfil their responsibilities;
- There is a designated safeguarding lead who is a member of the senior leadership team and a deputy for safeguarding and child protection who may be a senior leader or who reports directly to a senior leader. **Both will have undertaken approved training in inter-agency working**, in addition to basic child protection training. Their roles and responsibilities are made explicit in those post-holders' job descriptions;
- The school has in place a child protection policy that reflects the unique features of the community it serves and the needs of the pupils attending its provision.
- Additionally, it ensures the school has a staff behaviour (code of conduct), whistleblowing and procedures that are consistent with statutory requirements. These, with the CP policy are reviewed annually and made available to parents on the school's website and, on request. request in printed format;

- Procedures exist for dealing with allegations of abuse made against members of staff including allegations made against the Headteacher;
- Safer recruitment procedures are followed that include the requirement for appropriate checks in line with national guidance;
- A training strategy is agreed by governors that ensures all staff, including the Headteacher, receive child protection training, with refresher training at three-yearly intervals. The designated safeguarding lead should receive refresher training at two-yearly intervals;
- Regular update sessions for staff regarding safeguarding are provided so that staff are kept up to date with any changes and to ensure that safeguarding remains a priority at the school;
- Arrangements are in place to ensure that all temporary staff and volunteers are made aware of the school's arrangements for child protection;
- They nominate a member (normally the chair) to be responsible for liaising with the local authority and other agencies in the event of an allegation being made against the Headteacher.
- An annual report will be submitted to both the local authority and ODST about how the LGB's duties have been carried out. Any weaknesses or areas of concern will be rectified without delay.
- Ensure measures are in place to have oversight of how the school's delivery on its responsibilities are exercised and evidenced, following up with the Head Teacher any identified gaps in practice or where procedures may not have been followed.
- The school operates a safer recruitment procedure that includes:
  - statutory checks on staff suitability to work with children and the prohibition regulations;
  - seeking at least two references with checks being made to verify the identity of the person completing these;
  - ensuring safeguarding messages are contained in recruitment materials and adverts;
  - all recruitment interviews contain questions or scenarios of a safeguarding nature;
  - ensuring that there is at least one person on every recruitment panel who has completed Safer Recruitment training.
  - ensuring that at least one member of the governing body has completed safer recruitment training to be repeated every five years.
- Children are taught about safeguarding (including online safety) as part of a broad and balanced curriculum covering relevant issues through personal, social, health and economic education (PSHE) and through relationship and sex education (RSE); Through circle time, SEAL, and assemblies, children are taught about safeguarding through an awareness of key safeguarding messages and planned visits from national and local safeguarding bodies (i.e. NSPCC). ChildLine posters are exhibited throughout the school and the children are aware of its service.
- Appropriate safeguarding responses are in place for children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect including sexual abuse or exploitation and to help prevent the risks of their going missing in future;
- Appropriate online filtering and monitoring systems are in place;
- Enhanced DBS checks are in place for all members of the LGB; a section 128 check is also required for all those in "management positions" in an academy. Where that person is



engaged in regulated activity, an enhanced DBS check with barred list information is obtained ("children's workforce independent schools" is specified in the parameters), and this will identify any section 128 direction. Where a person is not engaging in regulated activity, and a barred list check cannot therefore be carried out, a separate check is made to see if that person is subject to a section 128 direction (for process see <https://www.safeguardingschools.co.uk/keeping-children-safe-in-education-2019/>)

(\*Note: Where a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Designated Safeguarding Lead will make a referral to the Disclosure and Barring Service, as required by the Safeguarding Vulnerable Groups Act 2006, and the Head Teacher will ensure that he or she has done so).

- Any weaknesses in Child Protection are remedied immediately.

#### **The Nominated Governor will:**

- Work with the DSL to draft the Child Protection Policy.
- Undertake the training available for Nominated Governors.
- Ensure child protection is, as a minimum, an annual agenda item for the Governing Body.
- Meet regularly with the DSL to review and monitor the school's delivery on its safeguarding responsibilities.

#### **The Headteacher will:**

- Ensure that the safeguarding and child protection policy and procedures are implemented and followed by all staff;
- Allocate sufficient time and resources to enable the designated safeguarding lead and deputy to carry out their roles effectively, including the assessment of pupils and attendance at strategy discussions and other necessary meetings;
- Ensure that all staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with ODST's whistleblowing procedures;
- Ensure that children's safety and welfare is addressed through the curriculum.

#### **The school has ensured that the designated safeguarding lead:**

- Creates a culture of safeguarding where children are protected from harm. Helping staff to be professionally curious, question behaviours and to "think the unthinkable" if they have concerns for a student
- Is appropriately trained and records are kept showing this is updated every 2 years;
- Acts as a source of support and expertise to the school community;
- Understands safeguarding procedures set out in local authorities' guidance;
- **Establishes and embeds** a policy and process for recording and storing information about child protection concerns and outcomes achieved, enabling records to be reviewed and an overview gained, to support timely interventions and allowing prompt follow up, if it is felt the needs of the student are not being met. Ensures that such records are stored securely and reported onward in accordance with this policy guidance, but kept separately from the child's general file;

- **Helps promote educational outcomes by appropriately sharing information about the welfare, safeguarding and child protection issues that children, particularly children with a social worker, are experiencing, or have experienced, with staff and ensures that any safeguarding or welfare concerns about a child inform the decisions made in relation to that child;**
- Refers cases of suspected neglect and/or abuse **to the three designated safeguarding partners, children's social care or police in accordance with this guidance and local procedure and in line with Working Together to Safeguard Children and NPCC "When to call the police"**  
<https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf>  
**and understands when they should consider calling the police and what to expect when they do;**
- Notifies children's social care if a child with a child protection plan is absent without a valid parental contact having been established, on the second day of absence;
- Ensures that when a child with a child protection plan leaves the school, their information is passed to their new school and the child's social worker is informed;
- Attends and/or contributes to child protection conferences in accordance with local procedure and guidance;
- Coordinates the school's contribution to child protection plans;
- Develops effective links with relevant statutory and voluntary agencies;
- Ensures that all staff sign to indicate that they have read and understood this policy;
- Ensures that the school's child protection policy is updated annually;
- Liaises with the nominated governor and Headteacher (where the role is not carried out by the Headteacher) as appropriate;
- Keeps a record of staff attendance at child protection training;
- Provide the Headteacher (if the head is not the DSL), with an annual report for the Local Governing Body, detailing how the school delivers on its safeguarding responsibilities and any child protection issues within the school. The Governing Body will report its responsibility to the LA and to the ODST HR team no later than the December of the academic year, following the academic year to which the report applies;
- Makes this policy available to parents.

#### **Deputy designated safeguarding lead**

The role-holder will be appropriately trained and, in the absence of the designated safeguarding lead, carries out those functions necessary to ensure the ongoing safety and protection of children. In the event of the long-term absence of the designated person, the deputy will assume all the functions above.

#### **All staff will:**

**Follow the local Safeguarding Children Board Procedures, now replaced by substituted by Local Authority guidance**, in all cases of abuse or suspected abuse. These can be found at [www.OSCB.org.uk](http://www.OSCB.org.uk) or:

Alison Beasley (LADO)

01865 825956 or 07833 436649

[Alison.beasley@oxfordshire.gov.uk](mailto:Alison.beasley@oxfordshire.gov.uk)

[http://www.proceduresonline.com/berks/windsor\\_maidenhead/p\\_report\\_concerns.html](http://www.proceduresonline.com/berks/windsor_maidenhead/p_report_concerns.html) ).

Attend annual training opportunities arranged or delivered by the DSL, in order to develop their understanding of the signs and indicators of abuse, how to respond to a pupil who discloses abuse and the procedure to be followed to promote a child's welfare. Staff will be supported to further develop their understanding as mechanisms are enhanced via team meetings, newsletters and e mail updates.

We will therefore:

- Implement and follow part 1 of this guidance;
- Understand that our responsibility to safeguard children requires that we all appropriately share any concerns that we may have about children;
- Support the child's development in ways that will foster security, confidence and resilience;
- Provide an environment in which children and young people feel safe, secure, valued and respected, feel confident and know how to approach adults if they are in difficulties;
- Provide a systematic means of monitoring children known or thought to be at risk of harm, and ensure we contribute to assessments of need and support plans for those children where appropriate;
- Ensure that detailed and accurate written records of concerns about a child are kept even if there is no need to make an immediate referral. Guidance on record keeping can be found at:
  - [http://portal.oxfordshire.gov.uk/content/public/CYPF/schools/behaviour\\_attendance/safeguarding\\_child\\_protection/Keeping\\_Child\\_Protection\\_Records.doc](http://portal.oxfordshire.gov.uk/content/public/CYPF/schools/behaviour_attendance/safeguarding_child_protection/Keeping_Child_Protection_Records.doc)
  - [http://www.proceduresonline.com/berks/windsor\\_maidenhead/contents.html](http://www.proceduresonline.com/berks/windsor_maidenhead/contents.html)

### **13. Multi agency working**

**Schools and colleges have a pivotal role to play in multi-agency safeguarding arrangements. Governing bodies and proprietors should ensure that the school or college contributes to multi-agency working in line with statutory guidance [Working Together to Safeguard Children](#).**

**The three safeguarding partners (the local authority; a clinical commissioning group for an area within the local authority; and the chief officer of police for an area (any part of which falls) within the local authority area) will make arrangements to work together with appropriate relevant agencies to safeguard and promote the welfare of local children, including identifying and responding to their needs. Governing bodies, Trustees and school senior leadership teams, especially their designated safeguarding leads, should make themselves aware of and follow their local arrangements.**

**If named as a relevant agency, ODST schools, in the same way as other relevant agencies, are under a statutory duty to co-operate with the published arrangements.**

### **14. Supporting Children**

We recognise that a child who is abused, who witnesses violence or who lives in a violent environment may feel helpless and humiliated, may blame him/herself, and find it difficult to develop and maintain a sense of self-worth. We also accept that research shows that the behaviour of a child in these circumstances may range from that which is perceived to be normal to aggressive or withdrawn.

Our school will support all children and young people by:

- Encouraging the development of self-esteem and resilience in every aspect of life;
- Promoting a caring, safe and positive environment;
- Liaising and working together with all other support services and those agencies involved in the safeguarding of children;
- Notifying Social Care as soon as there is a significant concern;
- Notifying Social Care when a child/young person attending the centre is privately fostered;
- Providing continuing support to a pupil (about whom there have been concerns) who leaves the school by ensuring that such concerns and school medical records are forwarded under confidential cover to the designated safeguarding lead at the pupil's new school immediately.

## 15. Confidentiality

**We recognise that all matters relating to child protection are confidential and the designated safeguarding lead will disclose personal information about a child or young person to other members of staff only where this is in the child's best interest.**

However, all staff must be aware that they have a professional responsibility to share information with other agencies to safeguard children and all staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.

We will always undertake to share our intention to refer a child to Social Care with their parents /carers unless to do so could put the child at greater risk of harm or impede a criminal investigation. If in doubt, we will consult with the Local Authority Designated Officer or MASH. We will take no names consultations with our local Assessment Teams / Multi-agency teams (referenced at page 12 above) to discuss concerns we may have, but we understand that if they then ask for a name we will disclose those details and it will become a referral.

**Governing bodies should ensure relevant staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in the Data Protection Act 2018 and the GDPR. This includes:**

- **being confident of the processing conditions which allow them to store and share information for safeguarding purposes**
- **understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows practitioners to share special category personal data.**
- **not providing pupils' personal data where the serious harm test under the legislation explained on the [Disclosure and Barring service website](#), is met and guidance sought from the [Data protection: toolkit for schools](#) .**

## 16. Supporting Staff

- We recognise that staff working in the school who have become involved with a child 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 Designated Safeguarding Lead and to seek further support. This could be provided by

another trusted colleague, Occupational Health, and/or a representative of a professional body or trade union, as appropriate;

- We have adopted the ODST guidance on conduct for staff at our school. This forms part of staff induction. We understand that staff should have access to advice on the boundaries of appropriate behaviour;
- We recognise that our Designated Person(s) should have access to support and appropriate workshops, courses or meetings as organised by the LA.

## 17. Allegations against staff **and adults**

- **All staff (including supply staff and volunteers)** should take care not to place themselves in a vulnerable position with a child. It is always advisable for interviews or work with individual children or parents to be conducted in view of other adults;
- We understand that a child or young person may make an allegation against a member of staff. If such an allegation is made, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior member of staff available;
- The manager on all such occasions will discuss the content of the allegation with the Designated Officer for the Local Authority (LADO), **before taking any action.**

**In Oxfordshire contact should be made with:**

LADO

**Alison Beasley**

Tel: 01865 815956 or 07833 436649.

Email: [alison.beasley@oxfordshire.gov.uk](mailto:alison.beasley@oxfordshire.gov.uk)

Assistant Designated Officers

- **Donna Crozier**

Tel: 01865 816382 or 07901 331799

Email: [donna.crozier@oxfordshire.gov.uk](mailto:donna.crozier@oxfordshire.gov.uk)

- **Sandra Pasquet**

Tel: 01865 323457 or 07785 453264

Email: [sandra.pasquet@oxfordshire.gov.uk](mailto:sandra.pasquet@oxfordshire.gov.uk)

- **Charlotte Allen**

LADO team 01865 810603 or [lado.safeguardingchildren@oxfordshire.gov.uk](mailto:lado.safeguardingchildren@oxfordshire.gov.uk)

**In the Royal Borough of Windsor and Maidenhead:**

LADO

Achieving for Children, Richmond, Kingston and Windsor & Maidenhead LADO service Tel: 07774 332675

Email: [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)

New referrals: Tel: 020 8891 7370 [LADO@achievingforchildren.org.uk](mailto:LADO@achievingforchildren.org.uk)

**Multi Agency Safeguarding and Early Help Hub (MASH)**

Tel: 01628 683150 and 01628 685995

**Emergency Duty Service** (any time outside the hours above)

- **If the allegation** made to a member of staff **concerns the manager/headteacher** themselves, the person receiving the allegation will immediately **inform the Chair of Governors** who will consult with the LADO, without notifying the manager first;
- The school will follow the procedures for managing allegations against staff, as outlined in **Part 4 of 'Keeping Children Safe in Education' 2020**;
- Suspension of the member of staff against whom an allegation has been made needs careful consideration, and we will consult with the LADO and ODST HR Manager in such circumstances;
- **Where a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned, the Designated Safeguarding Lead will make a referral to the Disclosure Barring Service, as required by the Safeguarding Vulnerable Groups Act 2006, and the Head Teacher will ensure that he or she has done so. This is a legal duty and failure to refer when the criteria are met is a criminal offence.**
- **Supply teachers** - In some circumstances schools and colleges will have to consider an allegation against an individual not directly employed by them, where its disciplinary procedures do not fully apply, for example, supply teachers provided by an employment agency.
- **Whilst schools and colleges are not the employer of supply teachers, they should ensure allegations are dealt with properly. In no circumstances should a school or college decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the local authority designated officer (LADO) to determine a suitable outcome.**
- **Agencies should be fully involved and co-operate in any enquiries from the LADO, police and/or children's social services. The school will usually take the lead**
- **When using an agency, schools and colleges should inform the agency of its process for managing allegations. This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.**
- Our lettings agreement for other users requires that the organiser will follow LA procedures for managing allegations against staff and, where necessary, the suspension of adults from premises.
- See flowchart appendix B **and refer to ODST's managing allegations against staff policy.**

## 18. Whistleblowing

- We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so;
- All staff should be aware of their duty to raise concerns about the attitude or actions of colleagues and appropriate advice will be sought from the LADO or Safeguarding Team where necessary.
- The NSPCC whistleblowing helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. **(0800 800 5000** – line is available from 8:00 AM to 8:00 PM, Monday to Friday; Email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)).

- A tool to support safeguarding concerns to be reported can be found on our website which has the Department for Education “Report a concern” button.
- Full details are provided in our whistleblowing policy.

DRAFT

## 19. Physical Intervention/Positive Handling

- Our policy on physical intervention/positive handling by staff is set out separately, as part of our Behaviour Policy. It complies with LA Guidance and DfE guidance on 'The Use of Force to Control or Restrain Pupils' 2013<sup>3</sup> (reviewed July 2015);
- Such events should be recorded and signed by a witness;
- We recommend that staff who are likely to need to use physical intervention should be appropriately trained;
- We understand that physical intervention of a nature which is both unreasonable and disproportionate to the circumstances and or causes injury or distress to a child may be considered under child protection or disciplinary procedures;
- Full details are in our Behaviour policy.

## 20. Anti-Bullying

- Our policy on the prevention and management of bullying is set out in a separate policy and acknowledges that to allow or condone bullying may lead to consideration under child protection procedures. Bullying is a safeguarding matter that if left unresolved can become a child protection matter. Our school will take seriously any bullying concerns and investigate and act to protect pupils where appropriate;
- We will liaise with the anti-bullying co-ordinator/officer where appropriate <http://schools.oxfordshire.gov.uk/cms/content/anti-bullying>; or [http://www.proceduresonline.com/berks/windsor\\_maidenhead/p\\_bullying.html](http://www.proceduresonline.com/berks/windsor_maidenhead/p_bullying.html)
- Full details are in our anti-bullying policy.

## 21. Attendance

- The school's Attendance Policy has robust systems in place for monitoring attendance and we will act to address absenteeism with parents and pupils promptly to effect change and identify any safeguarding issues arising.
- All children attending our school are required to have a minimum of two identified emergency contacts, this is to support prompt communication in the event of a serious incident or a child missing from school
- We have a robust 'first day alert' call system to establish reasons for non-attendance.
- Any pupil absent for ten school days, where it has not been possible to make contact with a parent/carers, will be reported as a Child Missing in Education using the CME Protocol. (see Children Missing from Education Policy)
- Any absence of two consecutive school days, without satisfactory explanation, of a pupil currently subject to a child protection plan will be immediately referred to their social worker.



- Parents must inform school if there are any changes to where a pupil will be living. The school has a mandatory duty to inform the local authority Via the First Response Team, if a child under the age of 16 yrs., lives with someone other than their parent, step-parent, aunt, uncle or grandparent for a period of more than 28 days. This is defined as being a private fostering arrangement

## 22. Health & Safety

- Our Health & Safety policy, reflects the consideration we give to the protection of our children both physically within the school environment and, for example, in relation to internet use, and when away from the school when undertaking school trips and visits;
- Full details are in our health and safety policy.

## 23. Children with Special Educational Needs

At our school, we recognise that children with special educational needs (SEN) and disabilities can face additional safeguarding challenges. This policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. This can include:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- Children with SEN and disabilities can be disproportionately impacted by things like bullying-without outwardly showing any signs;
- Communication barriers and difficulties in overcoming these barriers.

Children with SEN and disabilities can face additional safeguarding challenges. The Governing body ensures its child protection policy reflects the fact that additional barriers can exist when recognising abuse and neglect in this group of children. These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration;
- being more prone to peer group isolation than other children;
- the potential for children with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs; and
- communication barriers and difficulties in overcoming these barriers.

To address these additional challenges, leaders and managers will consider the need for extra pastoral support for children with SEN and disabilities to identify and mitigate these risks.

Following the theme of children looked after or who may have SEN and/ disabilities, the use of reasonable force is emphasised in KCSIE 2020, as something that schools need to be cautious about. There are some circumstances when reasonable force might be a possibility, or it might be part of a strategy to deal with an incident of very challenging behaviour, but this guidance, along with previous comments from Ofsted, is very much about creating individual plans in order to minimise the likelihood of challenging behaviour, and when it does occur, that there is less use of physical restraint and other restrictive methods.

## 24. Children potentially at greater risk of harm

**Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of**

adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health.

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

## 25. Types of abuse and neglect

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

- **Abuse:** a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children;
- **Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning or scalding, drowning, suffocating or otherwise causing physical harm to a child. Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child;
- **Emotional abuse and mental health: 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.**  
**35. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences. The persistent emotional maltreatment of a child may be such as to cause severe and adverse effects on the child's mental health and emotional development.** It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. These and other forms of emotional abuse may also signal that children are at risk from, or are involved with, serious violent crime including receiving unexplained gifts/new possessions, increased absence from school and changes in friendship/relationships with others/groups; significant decline in performance, self-harm, signs of assault/unexplained injury.
- **Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault

by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet); up-skirting, typically when a photograph is taken under a child or young person's clothing without them knowing to obtain sexual gratification, or cause the victim humiliation, distress, or alarm (and which is now a criminal offence). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

- **Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to: provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.
- **Domestic abuse: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.**

## 26. Specific safeguarding issues

- **All staff** have an awareness of safeguarding issues- some of which are listed below. Staff are made aware that behaviours linked to the likes of drug taking, alcohol abuse, truanting and sexting put children in danger;
- They understand safeguarding and protection of students has to be view within the context of the pupil's lived experience and the factors around him/her which may impact on this; friends, family school and their community
- The changing landscape of safeguarding and protecting children from harm requires staff to be aware of children being trafficked both from abroad and locally as part of ongoing exploitation, financial or sexual. Our admissions processes will therefore ask for proof of identification and who has parental responsibility for a student – where managed at point of entry by the Local Authority this process will have been initiated by them. We will however ask parents/carers to update contact details and alert us to changes of address or care arrangements within 48 hrs of a change.
- **All staff** are made aware that safeguarding issues can manifest themselves via peer on peer abuse, themes of exploitation and management of sexual violence and sexual harassment. This is most likely to include, but not limited to: bullying (including cyber bullying), gender-based violence/sexual assaults and sexting. Staff are made clear of our policy and procedures with regards to peer on peer abuse;

- bullying including cyberbullying <http://schools.oxfordshire.gov.uk/cms/content/anti-bullying>  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/623895/Preventing\\_and\\_tackling\\_bullying\\_advice.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/623895/Preventing_and_tackling_bullying_advice.pdf)
- **Child Criminal Exploitation (CCE)**  
<https://www.nspcc.org.uk/what-is-child-abuse/types-of-abuse/gangs-criminal-exploitation/>
- children missing education <http://schools.oxfordshire.gov.uk/cms/content/pupil-tracking>
- child missing from home or care  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/307867/Statutory\\_Guidance\\_-\\_Missing\\_from\\_care\\_3\\_.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/307867/Statutory_Guidance_-_Missing_from_care_3_.pdf)
- child sexual exploitation (CSE) <http://www.oscb.org.uk/children-young-people-2/promise/> and Annex A
- domestic violence <http://www.oscb.org.uk/themes-tools/domestic-abuse/>
- drugs  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/270169/drug\\_advice\\_for\\_schools.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/270169/drug_advice_for_schools.pdf)
- fabricated or induced illness  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/277314/Safeguarding\\_Children\\_in\\_whom\\_illness\\_is\\_fabricated\\_or\\_induced.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/277314/Safeguarding_Children_in_whom_illness_is_fabricated_or_induced.pdf)
- faith abuse  
[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/175437/Action\\_Plan\\_-\\_Abuse\\_linked\\_to\\_Faith\\_or\\_Belief.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf)
- female genital mutilation (FGM)  
<http://www.oscb.org.uk/themes-tools/fgm/> and Annex A
- forced marriage and honour-based violence  
<https://www.gov.uk/guidance/forced-marriage> and Annex A
- **Gang Violence, Child Criminal Exploitation & Drug Supply**  
<https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence>  
<https://www.nationalcrimeagency.gov.uk/who-we-are/publications/15-county-lines-gang-violence-exploitation-and-drug-supply-2016>
- gender-based violence/violence against women and girls (VAWG)  
<https://www.gov.uk/government/policies/violence-against-women-and-girls>
- hate  
<http://educateagainsthate.com/>
- **mental health**  
<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>  
<https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing>
- modern slavery  
<https://www.gov.uk/government/collections/modern-slavery>  
<https://www.antislavery.org/take-action/schools/>

- human trafficking  
<https://www.gov.uk/government/publications/safeguarding-children-who-may-have-been-trafficked-practice-guidance>  
<https://www.nationalcrimeagency.gov.uk/what-we-do/crime-threats/modern-slavery-and-human-trafficking>
- missing children and adults strategy  
<https://www.gov.uk/government/publications/missing-children-and-adults-strategy>
- online safety <http://schools.oxfordshire.gov.uk/cms/content/internet-safety-and-cyberbullying>
- private fostering  
<https://www.oxfordshire.gov.uk/cms/content/private-fostering-arrangements>
- preventing radicalisation <https://www.gov.uk/government/publications/protecting-children-from-radicalisation-the-prevent-duty> and Annex A
- relationship abuse  
<https://www.disrespectnobody.co.uk/relationship-abuse/what-is-relationship-abuse/>
- Sexual violence and sexual harassment between children:  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/719902/Sexual\\_violence\\_and\\_sexual\\_harassment\\_between\\_children\\_in\\_schools\\_and\\_colleges.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf)
- sexting  
<https://www.disrespectnobody.co.uk/sexting/what-is-sexting/> and Annex A
- Statutory guidance: relationships education relationships and sex education (RSE) and health education. <https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education>

**Annex A contains important additional information about specific forms of abuse and safeguarding issues.**

## 27. Online safety

At our school, our pupils increasingly work on-line and we recognise that it is crucial to safeguard our pupils from potentially harmful and inappropriate online material. As such we ensure appropriate filters and appropriate monitoring systems are in place. We share with parents/carers our policy on the school's website and provide parent information to support this aspect in the pupil's home.

All our pupils and users of the school's network will sign an 'acceptable use' statement and the staff code of conduct has specific guidance about social networking and contact, online, with pupils.

All staff are aware of the school & Trust policy on E-Safety which sets out our expectations relating to:

- Creating a safer online learning environment
- Giving everyone the skills, knowledge and understanding to help children and young people stay safe on line, question the information they are accessing and support the development of critical thinking
- Inspiring safe and responsible use and behaviour of mobile technologies, to combat behaviours on line which may make students vulnerable including sexting

- Use of mobile technology both within school and on school trips/ outings
- Use of camera equipment, including camera phones
- What steps to take if there are concerns and where to go for help
- Staff use of social media as set out in the Staff Code of Conduct.

Cyber-bullying by children, via texts and emails, will be treated as seriously as any other type of bullying and will be managed through our anti-bullying procedures. This includes sexting and image exchange under threat or use of coercion

Pupils, staff and parents are supported to understand the risks posed by the CONTENT accessed by pupils – their CONDUCT on line– and who they have CONTACT with in the digital world.

We have a separate mobile phone policy which sets out the acceptable use of mobile technologies by pupils whilst onsite. This includes sanctions which will be applied when these boundaries are not adhered to.

Visitors to our school are respectfully requested to turn all mobile devices off. This is a safeguarding measure for our students.

Staff use of mobile technology whilst on site is set out in the Staff Code of Conduct.

#### Sexting

'Sexting', also referred to as 'youth produced sexual imagery' and which includes "up-skirting", is one of a number of 'risk-taking' behaviours associated with the use of digital technologies, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated.

Staff, pupils and parents are supported via training to understand the creation and sharing of sexual imagery, such as photos or videos, of under 18s is illegal. This includes imagery of pupils themselves if they are under the age of 18.

Any youth produced sexual imagery disclosures will follow the normal safeguarding practices and protocols for our school. We will also use the guidelines for responding to incidents, as set out in the publication 'Sexting in Schools and Colleges' produced by the UK Council for Child Internet Safety. This requires us to share reports of sexting with the police

## 28. Opportunities to teach safeguarding

In our school, we ensure our pupils are taught about safeguarding, including online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum; Teaching of on-line safety in schools <https://www.gov.uk/government/publications/teaching-online-safety-in-schools> This may include covering relevant issues through personal, social, health and economic education (PSHE) and through the requirements of relationships education, relationships and sex and health education (RERSHE): relationships education for all primary schools, relationships and sex education for middle/secondary schools and health education for all pupils.

## 29. Allegations of abuse made against other children (peer on peer abuse)

Our staff recognise that children are capable of abusing their peers. In a situation where child abuse is alleged to have been carried out by another child, our child protection procedures

should be adhered to for both the victim and the alleged abuser; this means it should be considered as a child care and protection issue for both children.

Abuse between children is still abuse, and is not tolerated, or made light of.

Peer on peer abuse can take many forms, and gender issues can be prevalent when dealing with this type of abuse; this could for example include **children being sexually touched/assaulted or being subject to initiation/hazing type violence.**

In most instances, the conduct of pupils towards each other will be covered by our behaviour policy, and such allegations of peer on peer abuse will be recorded, investigated and dealt with in accordance with that policy. However, some allegations may be of such a serious nature that they may raise additional safeguarding concerns and ODST recognises that these include:

- Domestic abuse – an incident or pattern of actual or threatened acts of physical, sexual, financial and/or emotional abuse, perpetrated by an adolescent against a current or former dating partner regardless of gender or sexuality;
- Child Sexual Exploitation – children under the age of 18 may be sexually abused in the context of exploitative relationships, contexts and situations by peers who are also under 18;
- Harmful Sexual Behaviour – Children and young people presenting with sexual behaviours that are outside of developmentally ‘normative’ parameters and harmful to themselves and others;
- Serious Youth Violence – Any offence of most serious violence or weapon enabled crime, where the victim is aged 1-19’ i.e. murder, manslaughter, rape, wounding with intent and causing grievous bodily harm. ‘Youth violence’ is defined in the same way, but also includes assault with injury offences.
- Children at risk from or involved with serious violent crime.

We aim to reduce the likelihood of peer on peer abuse through:

- the established ethos of respect, friendship, courtesy and kindness;
- high expectations of behaviour;
- clear consequences for unacceptable behaviour;
- providing a developmentally appropriate PSHE curriculum which develops pupils’ understanding of healthy relationships, acceptable behaviour, consent and keeping themselves safe;
- systems for any pupil to raise concerns with staff, knowing that they will be listened to, valued and believed;
- robust risk assessments and providing targeted work for pupils identified as being a potential risk to other pupils and those identified as being at risk.

Pupils will be taught how to support their friends if they are concerned about them, that they should talk to a trusted adult in the school and what services they can contact for further advice.

Any concerns, disclosures or allegations of peer on peer abuse in any form should be referred to the Designated Person using the school’s child protection procedures as set out in this

policy. Where a concern regarding peer on peer abuse has been disclosed to the Designated Person, advice and guidance will be sought from Children’s Social Care and where it is clear a crime has been committed or there is a risk of crime being committed, the Police will be contacted.

Working with external agencies the school will respond to the unacceptable behaviour. If a pupil’s behaviour negatively impacts on the safety and welfare of other pupils, then safeguards will be put in place to promote the well-being of the pupils affected and the victim and perpetrator will be provided with support.

Full details of procedures for dealing with Allegations of Abuse against other children will be covered by the behaviour policy and further policy guidance (above) and to follow, on peer on peer abuse.

### 30. Dealing with Disclosures

**If a pupil asks to speak to you about a problem, do not promise confidentiality but explain that it may be necessary to consult a colleague.**

#### Receive

- Always stop and listen straight away to someone who wants to tell you about incidents or suspicions of abuse.
- Listen quietly and actively, giving your undivided attention.
- Allow silences when needed.
- Do not show shock or disbelief but take what is said seriously.

#### Reassure

- Stay calm, no judgements, empathise.
- **Never make a promise that you can keep what a child has said a secret.**
- Give reassurance that only those who need to know will be told.
- Reassure the young person that they were right to tell you

#### React

- React to the pupil only as far as is necessary for you to establish whether you need to refer this matter, but don’t interrogate for full details.
- Don’t ask leading questions – keep the open questions e.g. ‘is there anything else you want to say?’
- Ask questions only to seek clarity if required; **TED** is a useful tool to use to ensure questions remain open

<b>T</b>	<b>E</b>	<b>D</b>
Tell me...	Explain about .....	Describe when, where .....

- Do not criticize the perpetrator; the pupil may have affection for him/her.
- Explain what you will do next – inform designated safeguarding lead, keep in contact.

#### Record

- If possible, make brief notes about what they are telling you at the time.
- Keep these notes, however rough they are.
- If you are unable to make notes at the time write down what was said as soon as you can.



- Note the **time, date and place** along with what **actions or behaviours, statements or conversations heard** which have given rise to the concerns. All reports should be **signed with times and dates** noted of when reports are given to the DSL.
- Try to record what was said by the pupil rather than your interpretation of what they are telling you. For example, if a child has called a body part by an unfamiliar name, this should be written phonetically. Make a note of any accompanying non-verbal behaviour and how the information was imparted recreating the 'voice of the child' on the page
- Record the date, time, place and any noticeable nonverbal behaviour.
- Be mindful of the time the allegation is received. Whilst the child is at school they are safe, but assessment may be needed involving other agencies to ascertain whether it is safe for the child to return home. So, a verbal report to the DSL should be made rather than delay this for a written report.
- In the event of peer on peer abuse, staff should be mindful of the language they use when reporting the events. Avoid terms such as "perpetrator" and "victim" as both children may be vulnerable and to require support. Rather use pupil 1 and pupil 2.
- If records are kept electronically the security of these needs to be reviewed regularly. Child protection records should not be kept in a child's general school file. They should be kept separately in a locked cabinet. (see appendix D)

### Report

- Report the incident to the designated safeguarding lead and do not tell any other adults or pupils what you have been told.

**Any allegation / disclosure regarding a member of staff MUST be referred immediately to the Headteacher who will consult with the LADO before taking action.**

**Any allegation / disclosure regarding the Headteacher MUST be referred immediately to the Chair of Governors who will consult with the LADO and notify the ODST HR Manager without notifying the headteacher.**

**Never attempt to carry out an investigation of suspected abuse by interviewing the young person or any others involved. This is a highly skilled role and any attempts by yourself could affect possible criminal proceedings.**

## 31. Record Keeping

The designated safeguarding lead is responsible for ensuring that the necessary paperwork is completed and sent to the relevant people and stored in a safe and confidential place. This means that the records will be a coherent factual record of the concerns that are stored on individual children in a clear chronological order.

[http://schools.oxfordshire.gov.uk/cms/sites/schools/files/folders/folders/documents/safeguarding/Keeping\\_Child\\_Protection\\_Records.doc](http://schools.oxfordshire.gov.uk/cms/sites/schools/files/folders/folders/documents/safeguarding/Keeping_Child_Protection_Records.doc)

[http://www.proceduresonline.com/berks/windsor\\_maidenhead/contents.html](http://www.proceduresonline.com/berks/windsor_maidenhead/contents.html)

## Appendix A – Definitions

### A. Child sexual exploitation (CSE)

Sexual exploitation is a form of sexual abuse in which young people are exploited, coerced and/or manipulated into engaging in some form of sexual activity in return for something they need or desire and/or for the gain of a third party. The “something” received by the child or young person can include both tangible items such as food, somewhere to stay, drugs, alcohol, cigarettes or money and more intangible “rewards” such as perceived affection, protection or a sense of value of belonging. Fear of what might happen if they do not comply can also be a significant influencing factor.

**Sexual exploitation can occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual activity. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. In some cases, the abuse will be in exchange for something the victim needs or wants (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may or may not, be accompanied by violence or threats of violence. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online without the child’s immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain.**

Sexual exploitation can manifest itself in many different forms, including grooming, abuse by an individual who has established a “seemingly consensual” relationship with a child or young person, informal “introductions” to other (potential) abusers and the formal prostitution of a child. Children and young people can also find themselves exploited through the production and distribution of sexual images or through exposure to such images. Common to all these scenarios is an imbalance of power in favour of the abuser and some degree of coercion, intimidation, exploitation, violence and/or enticement of the child or young person.

The sexual exploitation of children and young people under 18 involves exploitative situations, contexts and relationships where young people, (or a third person or persons) receive something, (e.g. food, accommodation, drugs, alcohol, cigarettes, affections, gifts, money) as a result of them performing and/or others performing on them, sexual activities. Child sexual exploitation can occur through the use of technology without the child’s immediate recognition; for example, being persuaded to post sexual images on the internet/mobile phones without immediate payment or gain. In all cases those exploiting the child/young person have power over them by virtue of their age, gender, intellect, physical strength and/or economic or other resources. Violence, coercion and intimidations are common, involvement in exploitative relationships being characterised in the main by the child’s or young person’s limited availability of choice, resulting from their social/economic and/or emotional vulnerability. (DCSF 2009).

#### Key Facts about CSE

- Sexual exploitation often starts around the age of 10 years old. Girls are usually targeted from age 10 and boys from age 8;

- It affects both girls and boys and can happen in all communities;
- Any person can be targeted but there are some particularly vulnerable groups: Looked after Children, Children Leaving Care and Children with Disabilities;
- Victims of CSE may also be trafficked (locally, nationally and internationally);
- Over 70% of adults involved in prostitution were sexually exploited as children or teenagers.

Sexual violence or abuse against children represents a major public health and social welfare problem within UK society, affecting 16% of children under 16. That is approximately 2 million children.

#### **Good practice – Individuals**

- Recognise the symptoms and distinguish them from other forms of abuse;
- Treat the child/young person as a victim of abuse;
- Understand the perspective / behaviour of the child/young person and be patient with them;
- Help the child/young person to recognise that they are being exploited;
- Collate as much information as possible;
- Share information with other agencies and seek advice / refer to Social Care.

#### **Good practice – organisations**

- Ensure robust safeguarding policies and procedures are in place which cover CSE;
- Promote and engage in effective multi-agency working to prevent abuse;
- Work to help victims move out of exploitation;
- Cooperate to enable successful investigations and prosecutions of perpetrators.

### **B. Child on child sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support and every effort is made to ensure their education is not disrupted. It is also important that other children and school staff are supported and protected as appropriate.

Governing bodies and proprietors should be aware of the department advice: [Sexual violence and sexual harassment between children in schools and colleges](#)

This emphasises the need for effective training and policies in schools and colleges; the need for schools / colleges to respond on a case-by-case basis, supported by children's social care and the police if required.

It breaks the requirement for schools down into bite size pieces

#### **i. The immediate response to a report**

The emphasis here is on the importance of the school's initial response to a report from a child. All victims must be taken seriously, supported and kept safe. Clarity is given to how all staff should be trained to manage a report, as with any safeguarding concern.

Partner agencies should be contacted to coordinate support for the children involved this may include a referral to FRT and/the Police

ii. **Risk Assessment**

Following a report of sexual violence, the DSL (or deputy) should make an immediate assessment of risk and assess the needs of the children concerned accordingly, planning in the first instance must include the identified needs of the:

- the victim
- the alleged perpetrator
- all other children (and if appropriate adult students and staff).

All risk assessments should be recorded and regularly reviewed as more information comes to light or circumstances change. The DSL (or deputy) should ensure they are engaging with children's social care and specialist services as part of the plan of support for the children involved. Clear records need to be retained along with a chronology

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

**What to consider**

Schools should consider:

- the wishes of the victim in terms of how they want to proceed. A child's wish not to proceed however will need to be balanced against the need for protection. School/college will need to escalate concerns to FRT/Police if there is a risk of harm or a crime has been committed, a child and their family may need support to understand the duty of care the school/college holds
- the nature of the alleged incident
- the ages of the children involved
- the development stages of the children involved
- any power imbalance between the children?
- is the incident a one-off or a sustained pattern of abuse?
- are there ongoing risks to the victim, other children, school or college staff?
- contextual safeguarding issues

A child centred approach is needed throughout and staff may need support in managing this emotive issue. Support around use of language is crucial. It is rarely helpful to describe children's activities using adult terms such as perpetrator and victim. This has to be balanced with the need to ensure there is a clear understanding that sexual violence and sexual harassment is not acceptable and will not be tolerated.

iv. **Options to manage the report**

Four scenarios for schools and colleges have been included to support staff to consider when managing any reports of sexual violence and/or sexual harassment.

- *Manage internally – the school manages incidents.*
- *Early help – multi-agency early help*
- *Referrals to children's social care*
- *Reporting to the police – in parallel to children's social care*

v. **Considering bail conditions**

It is unlikely that a child will be on police bail with conditions attached, so it is essential that when there is a criminal investigation there is joined up working between the school or college, children's social care and the police to ensure all children involved are supported.

vi. **Managing any delays in the criminal process**

There may be delays in any criminal cases but schools and colleges **should not wait** for the outcome before putting protective measures in place

vii. **The end of the criminal process**

Regardless of whether a child is convicted of a crime or not, all the children involved should be protected.

viii. **Ongoing response for the victim**

Appropriate support should be available on an ongoing basis to the victim. The guidance includes sources of specific support. The guidance makes it clear that schools need to consider safeguarding issues around the victim and alleged perpetrator sharing classes and sharing space at school or college.

ix. **Safeguarding and supporting the alleged perpetrator**

Schools need to manage the balance between supporting the victim and ensuring the rights of the alleged perpetrator to an education

### C. **Child Drug/Criminal Exploitation**

The supply of class A drugs, from urban hubs to county towns, continues to be a widespread feature of gang-related activity and a key driver for their criminality. These gangs pose a significant threat to vulnerable adults and specifically to children who are increasingly relied on in the conduct of this criminality. Violence, kidnapping, the use of weapons and control through ruthless debt manipulation are frequent methods of controlling the adults and, as a result, the children involved.

Children in urban centres are frequently recruited to courier drugs and money. They are used as they are an inexpensive resource and easily controlled. Over 80% of areas with drugs issues saw the exploitation of children aged 11 -18 years by gangs. In almost all areas children are groomed with gifts and promises of money. Children from disadvantaged backgrounds are amongst those most vulnerable to gangs and White British children are seen as less likely to be targeted by law enforcement.

A recent report highlights:

- young adult female mothers with compliant young children where gangs enter relationships to utilise the controlling effect of threats of violence or actual physical harm on children
- the importance of mobile phones in controlling and managing the supply of drugs
- the risks of young children being increasingly exposed to drug dealing
- the use of sexual exploitation to enforce possession and storage of drugs
- accessibility of girls through drug related gangs to sexual exploitation with associated risks for young people.
- **One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs and a referral to the [National Referral Mechanism](#) should be considered.**
- **If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local**

services/third sector providers who offer support to victims of county lines exploitation.

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

#### D. Human Trafficking/Modern Human Slavery

Modern slavery is a term that covers:

1. human trafficking
  2. slavery, servitude and forced or compulsory labour
1. A sometimes-overlooked avenue of child protection is that of human trafficking<sup>4</sup> which can be used where a child or young person (including those aged 18 or over) has been trafficked for the purpose of sexual exploitation. Under this legislation, it is an offence to arrange or facilitate the travel of another person with a view to their being exploited, whether or not the victim consents to the travel. This covers entering, departing or travelling within any country or when a child is moved from one city to another within the UK. The offence covers recruiting, transporting, transferring, harbouring, receiving or exchanging control of that person.
  2. The United Nations defines human trafficking as the recruitment, transportation, transfer, harbouring, or receipt of persons by improper means (such as force, abduction, fraud, or coercion) for an improper purpose including slavery, servitude and forced or compulsory labour, or sexual exploitation. It takes on many forms today:
    - **Domestic Servitude** – Employees working in private homes are forced or coerced into serving and/or fraudulently convinced that they have no option to leave.
    - **Forced Labour** – Human beings are forced to work under the threat of violence and for no pay. These slaves are treated as property and exploited to create a product for commercial sale.
    - **Child Labour and enslavement** – whether forced labour, domestic servitude, bonded labour or sex trafficking – of a child.
    - **Sex Trafficking** – Women, men or children that are forced into the commercial sex industry and held against their will by force, fraud or coercion.
    - **Bonded Labour** – Individuals that are compelled to work to repay a debt and unable to leave until the debt is repaid. It is the most common form of enslavement in the world.
    - **Forced Marriage** – a FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone experiences duress to marry (physical, psychological, financial, sexual and emotional pressure (e.g. if someone is made to feel like they're bringing shame on their family). In the cases of some vulnerable adults who lack the capacity to consent, coercion is not required for a marriage to be forced. Honour-based abuse can be a trigger for a forced marriage. In an arranged marriage, the families of both prospective spouses take a leading role in arranging the marriage, but the choice of whether or not to accept the arrangement still remains with the couple.

The National Referral Mechanism (NRM) is a framework for identifying and referring potential victims of modern slavery and ensuring they receive the appropriate support.

---

<sup>4</sup> To simplify and condense human trafficking offences, The Modern Slavery Act 2015 introduced one offence of human trafficking covering sexual and non-sexual exploitation. Trafficking Offences contained in the Sexual Offences Act 2003 and The Protection of Freedoms Act 2012 have now been repealed and replaced by the offence of Human Trafficking

## E. Female Genital Mutilation FGM

FGM is child abuse and a form of violence against women and girls, and therefore should be dealt with as part of existing child safeguarding/protection structures, policies and procedures.

FGM is illegal in the UK. In England, Wales and Northern Ireland, the practice is illegal under the Female Genital Mutilation Act 2003.

Other than in the excepted circumstances, it is an offence for **any person (regardless of their nationality or residence status)** to:

- perform FGM in England, Wales or Northern Ireland (section 1 of the Act);
- assist a girl to carry out FGM on herself in England, Wales or Northern Ireland (section 2 of the Act); and
- Assist (from England, Wales or Northern Ireland) a non-UK person to carry out FGM outside the UK on a **UK national or permanent UK resident** (section 3 of the Act).

If a teacher, during their work in the profession, discovers that an act of Female Genital Mutilation appears to have been carried out on a girl under the age of 18 the teacher must report this to the police.

## F. Forced Marriage (FM)

FM is now a specific offence under s121 of the Anti-Social Behaviour, Crime and Policing Act 2014 that came into force on 16 June 2014.

A FM is a marriage conducted without the valid consent of one or both parties, and where duress is a factor. Forced marriage is when someone faces physical pressure to marry (e.g. threats, physical violence or sexual violence) or emotional and psychological pressure (e.g. if someone is made to feel like they're bringing shame on their family). This is very different to an arranged marriage where both parties give consent.

FM is illegal in England and Wales. This includes:

- taking someone overseas to force them to marry (whether or not the forced marriage takes place);
- marrying someone who lacks the mental capacity to consent to the marriage (whether they're pressured to or not).

## G. Prevent and radicalisation

The Counter Terrorism & Security Act 2015.

The Act places a Prevent duty on specified schools to have "due regard to the need to prevent people from being drawn into terrorism". The education and childcare specified authorities in Schedule 6 to the Act are as follows:

- The proprietors of maintained schools, non-maintained special schools, maintained nursery schools, independent schools (including academies and free schools) and alternative provision academies, PRUs, registered early years' providers, registered late years providers and some holiday schemes.

We are clear that exploitation of vulnerable children and radicalisation should be viewed as a safeguarding concern and follows the Department for Education guidance for schools and childcare providers on preventing children and young people from being drawn into terrorism.

Schools subject to the Prevent Duty will be expected to demonstrate activity in the following areas:

- Assessing the risk of children being drawn into terrorism;
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies;
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board;
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism;
- Expected to ensure children are safe from terrorist and extremist material when accessing the internet in school.

School staff receive training to help identify early signs of radicalisation and extremism. Indicators of vulnerability to radicalisation and our procedures are detailed in the 'ODST Tackling Extremism & Radicalisation Policy'.

Opportunities are provided in the curriculum to enable pupils to discuss issues of religion, ethnicity and culture and the school follows the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014). [Educate Against Hate](#), is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism.

The school governors, the Head Teacher and the Designated Safeguarding Leads (DSLs) will assess the level of risk within the school and put actions in place to reduce that risk. Risk assessment may include the use of school premises by external agencies, anti-bullying policy and other issues specific to the school's profile, community and philosophy. ODST provides guidance on Prevent Risk Assessment processes and recording formats.

When any member of staff has concerns that a pupil may be at risk of radicalisation or involvement in terrorism, they should speak with the DSL. They should then follow normal safeguarding procedures. If the matter is urgent then the Police must be contacted. The Department of Education has also set up a dedicated telephone helpline for staff and governors to raise concerns around PREVENT (020 7340 7264). (See also DfE Channel guidance, part of the Prevent Strategy <https://www.gov.uk/government/publications/channel-guidance>)

### **Extremism**

Extremism goes beyond terrorism and includes people who target the vulnerable – including the young – by seeking to sow division between communities on the basis of race, faith or denomination; justify discrimination towards women and girls; persuade others that minorities are inferior; or argue against the primacy of democracy and the rule of law in our society. Extremism is defined in the Counter Extremism Strategy 2015 as the vocal or active opposition to our fundamental values, including the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. We also regard calls for the death of members of our armed forces as extremist.

## **H. Youth produced sexual imagery - Sexting**



Sharing photos and videos online is part of daily life for many people, enabling them to share their experiences, connect with friends and record their lives. This increase in the speed and ease of sharing imagery has brought concerns about young people producing and sharing sexual imagery of themselves. This can expose them to risks, particularly if the imagery is shared further, including embarrassment, bullying and increased vulnerability to sexual exploitation.

Youth produced sexual imagery refers to both images and videos where:

- A person under the age of 18 creates and shares sexual imagery of themselves with a peer under the age of 18;
- A person under the age of 18 shares sexual imagery created by another person under the age of 18 with a peer under the age of 18 or an adult;
- A person under the age of 18 is in possession of sexual imagery created by another person under the age of 18.
- Upskirting - taking a picture under a person's clothing **(not necessarily a skirt) without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm. This is a criminal offence under the Voyeurism (Offences) Act 2019. Anyone of any gender can be a victim of upskirting.**

All incidents of this nature should be treated as a safeguarding concern and in line with the UKCCIS guidance 'Sexting in schools and colleges: responding to incidents and safeguarding young people'<sup>5</sup>.

Cases where sexual imagery of people under 18 has been shared by adults and where sexual imagery of a person of any age has been shared by an adult to a child is child sexual abuse and should be responded to accordingly. Producing and sharing sexual images of under 18s is illegal.

The response to these incidents will be guided by the primary concern **at all times** of the welfare and protection of the young people involved. However, when an incident involving children or young people produced sexual imagery comes to a school or Academy's attention:

- The incident should be referred to the Designated Safeguarding Lead as soon as possible;
- The Designated Safeguarding Lead should hold an initial review meeting with appropriate school staff;
- The Designated Safeguarding Lead should take advice from the Local Authority Designated Officer
- There may be subsequent interviews with the young people involved (if appropriate);
- Parents may be informed at an early stage and involved in the process unless there is good reason to believe that involving parents would put the young person at risk of harm;

Immediate referral at the initial review stage should be made to Children's Social Care/Police if:

- The incident involves an adult;
- There is good reason to believe that a young person has been coerced, blackmailed or groomed or if there are concerns about their capacity to consent (for example, owing to special education needs);

---

5

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/609874/6\\_2939\\_SP\\_NCA\\_Sexting\\_In\\_Schools\\_FINAL\\_Update\\_Jan17.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/609874/6_2939_SP_NCA_Sexting_In_Schools_FINAL_Update_Jan17.pdf)

- What you know about the imagery suggests the content depicts sexual acts which are unusual for the child's development stage or are violent;
- The imagery involves sexual acts;
- The imagery involves anyone aged 12 or under.

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

Oxfordshire County Council's Sexting Resource Pack can be found here:

<http://schools.oxfordshire.gov.uk/cms/sites/schools/files/folders/folders/documents/safeguarding/SextingResourcePack.pdf>

*(Materials for RBWM are not available and ODST commends the OCC materials as examples of good practice for use across the trust)*

## **I. Children Missing Education**

Children missing education are children of compulsory school age who are not registered pupils at a school and are not receiving suitable education otherwise than at a school. Children missing education are at significant risk of: underachieving, being victims of harm, abuse and neglect, including sexual abuse and sexual exploitation, and radicalisation, or becoming NEET (not in education, employment or training) later in life.

Effective information sharing between parents, schools and local authorities who have a statutory function to make arrangements to identify, as far as it is possible to do so, children missing education (CME). ODST believes this is critical to ensuring that all children of compulsory school age are safe and receiving suitable education and will cooperate with local authorities to help them fulfil their statutory function.

We will monitor unauthorised absences and take appropriate action including notifying the local authority particularly where children go missing on repeat occasions and/or are missing for periods during the school day in conjunction with the Trust's policy 'Children missing education: guidance for Headteachers and Governing Bodies'.

Staff must be alert to signs of children at risk of travelling to conflict zones, female genital mutilation and forced marriage.

## **J. Children with family members in prison**

Approximately 200,000 children have a parent sent to prison each year. Trustees are clear of the increased risk for these children of poverty, stigma, isolation and poor mental health. These frequently lead to poor outcomes in school in academic success, social skills and relationships and in the behaviours presented in lessons and more generally around school.

ODBST schools will support pupils with parents or carers in prison through targeted work with individuals and peer groups. Support and resources to support schools and teachers are available through the National Information Centre on Children of Offenders (NICCO).

NICCO - <https://www.nicco.org.uk/>

## **K. Serious violence**

Children who are at risk from, or are involved with, serious violent crime, indicators of which may include receiving unexplained gifts or new possessions, increased absence from school and changes in friendship or relationships with older individuals or groups; significant decline in

performance; signs of self-harm or a significant change in wellbeing; signs of assault or unexplained injury .

The Serious Violence Strategy, which was introduced by the government in 2018, identifies offences such as homicides and knife and gun crime as key factors which account for around one percent of all recorded crime. The impact of serious violent crime on individuals and the community is significant. Tackling serious violence requires a multiple-strand approach involving a range of partners across different sectors.

The main areas that the Serious Violence Strategy focuses on are:

- tackling county lines
- early intervention and prevention
- supporting communities and local partnerships
- effective law enforcement and the criminal justice response.

## L. Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead (and any deputies) should be aware of contact details and referral routes in to the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. Homelessness Reduction Act: policy factsheets - <https://www.gov.uk/government/publications/homelessness-reduction-bill-policy-factsheets>

Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property. Whilst referrals and or discussion with the Local Housing Authority should be progressed as appropriate, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm.

The Homelessness Reduction Act 2017 places a new legal duty on English councils to provide everyone who is homeless or at risk of homelessness access to meaningful help including an assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live.

The new duties shift focus to early intervention and our schools are encouraged to work with local authorities to support those at risk.

Oxford City Council -

[https://www.oxford.gov.uk/info/20019/homelessness/412/if\\_you\\_are\\_homeless\\_or\\_at\\_risk\\_of\\_becoming\\_homeless](https://www.oxford.gov.uk/info/20019/homelessness/412/if_you_are_homeless_or_at_risk_of_becoming_homeless)

South Oxfordshire District Council - <http://www.southoxon.gov.uk/services-and-advice/housing>

West Oxfordshire District Council -

<https://www.westoxon.gov.uk/residents/housing/register-for-housing/>

Cherwell District Council - <https://www.cherwell.gov.uk/info/6/housing>

The Vale of the White Horse District Council - <http://www.whitehorsedc.gov.uk/services-and-advice/housing>

The Royal Borough of Windsor and Maidenhead - <https://www3.rbwm.gov.uk/housing>

## M. Cultural Issues including honour based abuse

As a Trust we are aware of the cultural diversity of the community around our schools and seek to work sensitively to address the unique culture of our pupils and their families as they relate to safeguarding and child protection. This includes children at risk of harm from abuse linked to a belief in spirit possession on the part of their parent, carer or wider community.

We are aware of the harm to children that can be caused by practices linked to culture, faith and beliefs and promote awareness through training and access to resources. Our staff will report concerns about abuse linked to culture, faith and beliefs in the same way as other child protection concerns.

We support pupils, via targeted sessions and delivery through our curriculum, to understand that some aspects of cultural or religious practice and beliefs could cause harm and they should turn to someone they trust or an organisation such as ChildLine for help and support. Links with local services, community organisations and faith leaders to provide support and helpful information on what is safe and unsafe practice within the culture/faith, groups of our school community.

**So-called ‘honour-based’ abuse or violence (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. New guidance has extended the concept of honour-based abuse to include FGM and Forced Marriage. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (whether or not violence is involved and regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.**

Staff understand that whilst we try always to work in partnership with families, sharing information with a parent or member of the family is not appropriate in some instances where there may be cultural differences of opinion on abuse. If they have a concern regarding a child that might be **at risk of HBA or who has suffered from HBA**, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multiagency liaison with police and children’s social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach (see following section).

## N. Mental Health

**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. Schools have a central role to play in enabling their pupils to be resilient and to support good mental health and wellbeing. It is important that schools promote good mental wellbeing for all pupils. Education about relationships, sex and health can be important vehicles through which schools can teach pupils about mental health and wellbeing.**

**A school’s approach to mental health and behaviour should be part of a consistent whole school approach to mental health and wellbeing. This should involve providing a structured school environment with clear expectations of behaviour, well communicated social norms and routines, which are reinforced with highly consistent consequence systems. This should**

be paired with an individualised graduated response when the behavioural issues might be a result of educational, mental health, other needs or vulnerabilities.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

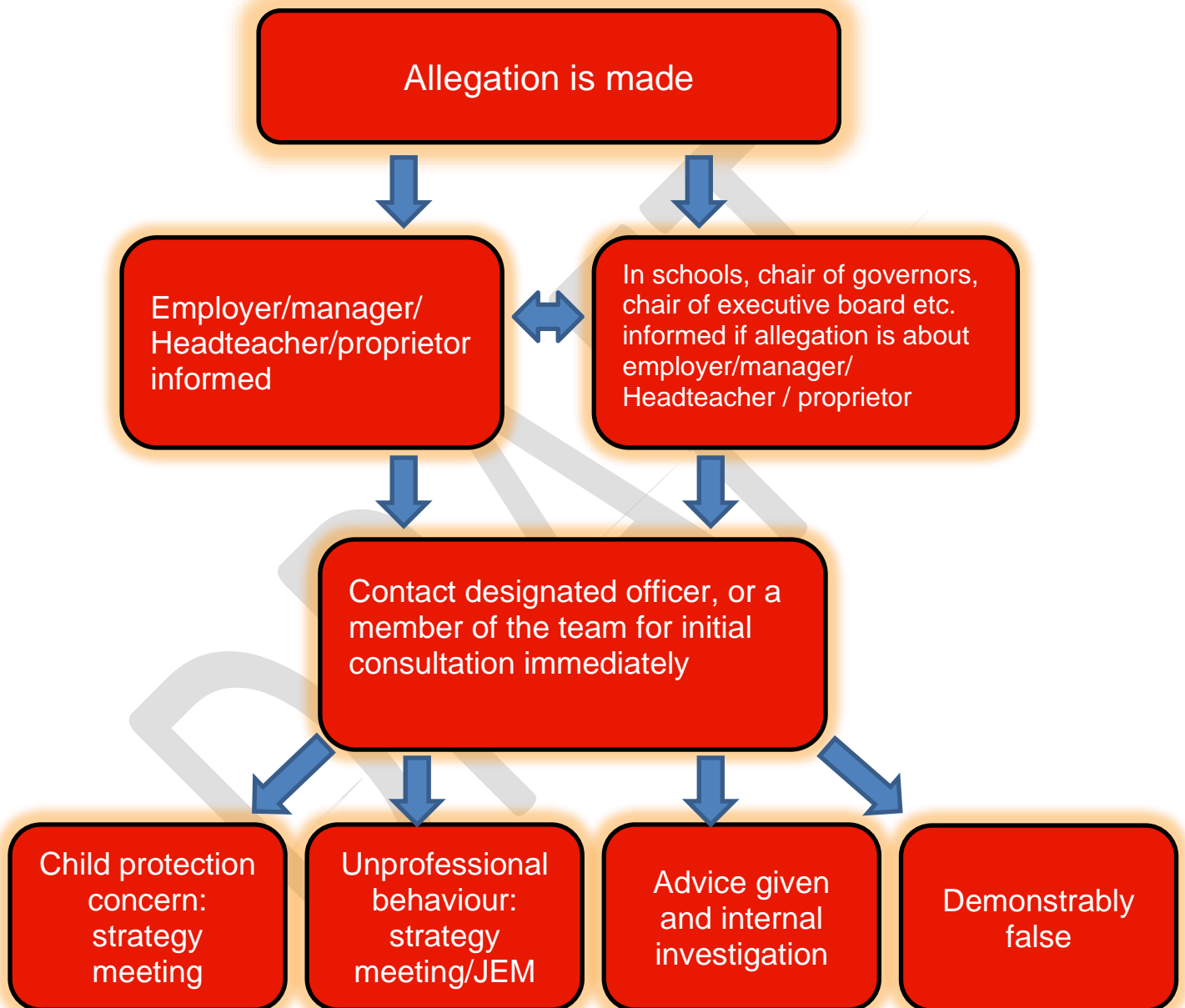
#### **Resources**

- [Mental health and behaviour in schools](#)
- [Promoting children and young people's emotional health and wellbeing](#)
- [Rise Above](#)

## Appendix B – Allegations Flowchart

### Allegation flowchart

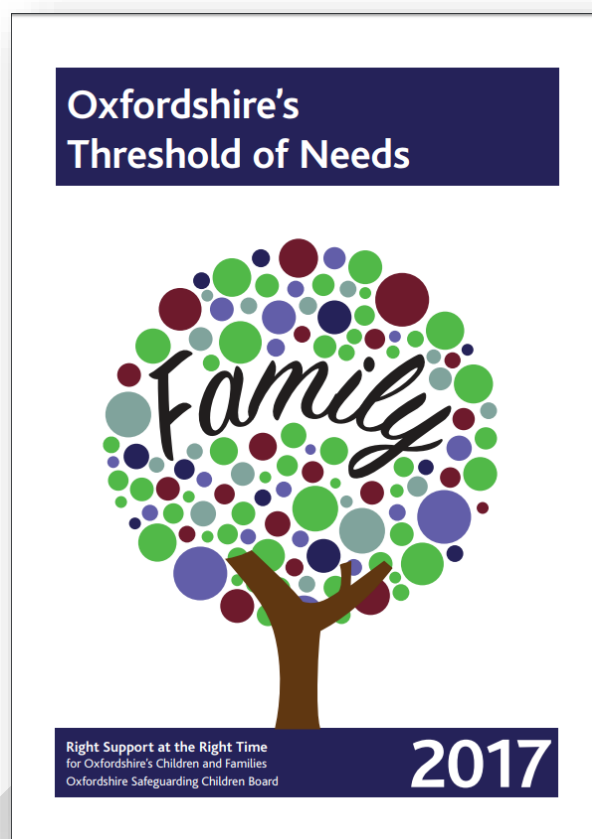
Below is a procedure to follow if you have a concern that a person who works with children and young people may have behaved inappropriately or you have received information that may constitute an allegation:



Please note JEM: Joint Evaluation Meeting

## Appendix C – Actions where there are concerns about a child

[http://www.oscb.org.uk/wp-content/uploads/Oxfordshire-Threshold-of-Needs\\_Final.pdf](http://www.oscb.org.uk/wp-content/uploads/Oxfordshire-Threshold-of-Needs_Final.pdf) remains as practical guidance post 29<sup>th</sup> September 2019.



**RBWM Multi Agency Threshold for Safeguarding The child's journey**

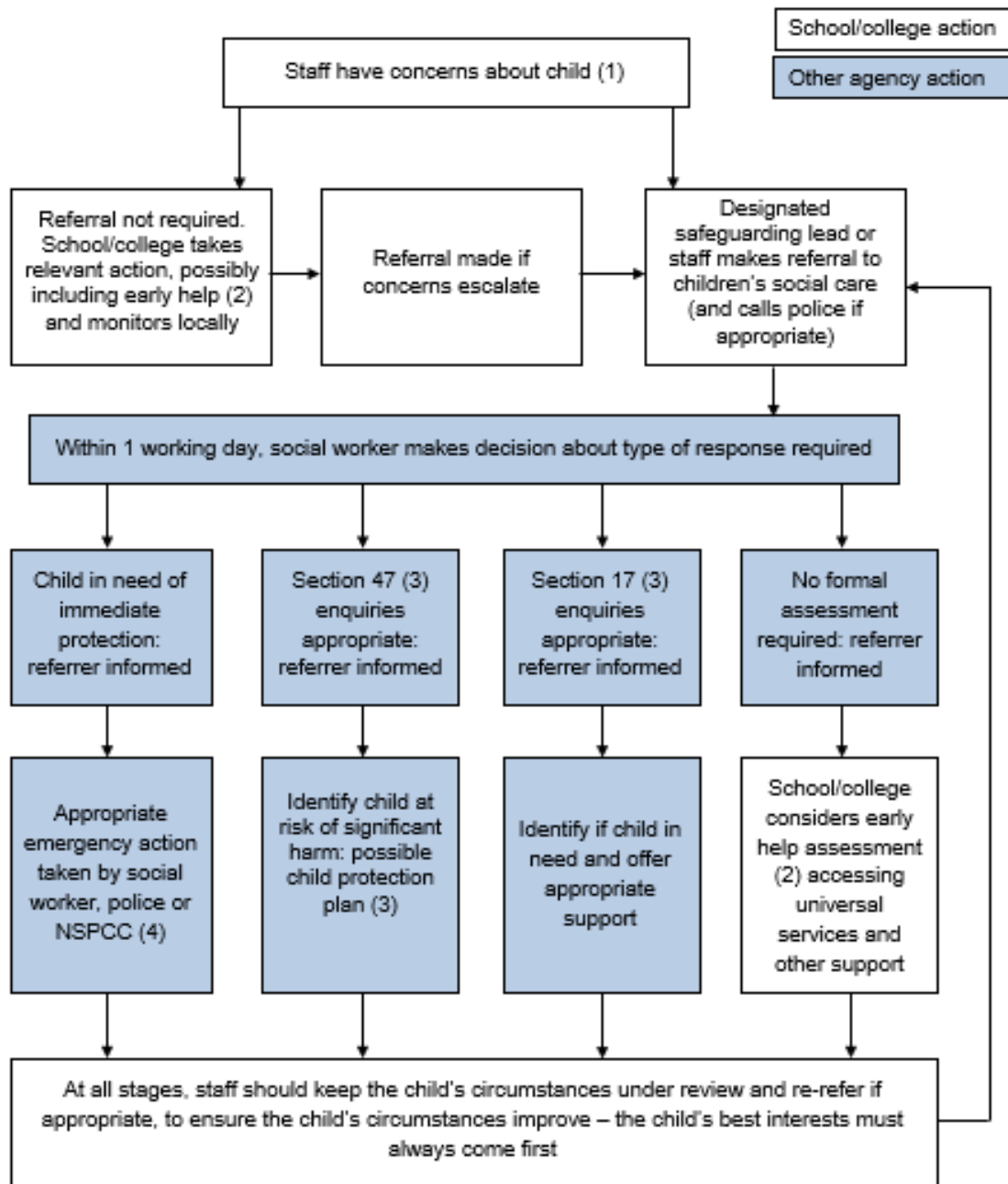
It is inevitable children, and young people and families will move from across one level of need. The transition from one level to another level up and down should happen seamlessly to ensure needs are appropriately met and information is shared. This applies to families moving downwards from level 3 or 4 to level 2 supports.

Level of Need	Universal	Preventative	Targeted	Specialist			
<b>Type of Response needed</b>	Needs can be met within universal provision May need limited support within the setting to avoid needs arising	Needs are well established and can be met within identified resources Requires additional support, usually within the setting	High level of unmet need e.g. Child's need downgraded from high need, with change of Lead Professional from social worker to another professional Requires co-ordinated multi-agency response / TAC approach Lead Professional required	At risk of becoming or has become a child in care Multi-agency plan failing TAC led by statutory social worker/NOT Education and Inclusion staff In need of formal child protection plan Often poor co-operation			
<b>Key Features</b>	Achieving learning targets Good attendance Meeting developmental milestones Has psychological well-being Socially interactive and skilled Ability to protect self and be protected Supportive relationships Housed, good diet and kept healthy Supportive networks Access to positive activities Protected by parents Secure and caring home Presence of consistent primary care giver Receive and act on information, advice and guidance Appropriate boundaries and guidance maintained Secure and caring parenting Families in poverty Lone parents English is not the chosen first language BEM Traveller community Barriers to inclusion	Low level school boundaries Attendance Reduced access to core needs Potential not to attain Low level emotional / mental health issues Slow in meeting developmental needs Language and communication difficulties Mild sensory impairment affecting developmental milestones Missing health checks/immunisations Minor health problems Early signs of offending behaviour Lack of stimulation Low level mental health Low level alcohol/drug use.	Sexual health boundaries Early signs of drug/ alcohol misuse Inconsistent care arrangements Poor supervision by parent/carer Inconsistent parenting Poor skills raising child or young person Young carers Poor parent/child relationships Historic context of parent/carer's own childhood Children of prisoners Bullying Poor housing Low income affects achievement Parenting advice needed to prevent needs escalating	Use of fixed term exclusions (2 or more in 12 month period should trigger CAF) Permanent exclusions/no school place Persistent absence from school No access to core services Disabilities affecting ability to remain in mainstream services Developmental milestones not being met and may affect ability to remain in mainstream services (initial behavioural support intervention unsuccessful) Language & communication problems Chronic/recurring health problems Regular missed appointments affecting developmental progress Severely/profound sensory impairment Child/YP reported missing more than once in any monthly period Children at risk of grooming - gang related activity Children at risk of sexual exploitation Pregnancy conceived by onscreen adult/child	Developmental delay as a result of disability and/or special educational needs Teenage pregnancy CAF of unborn child & parents Continuing sexually inappropriate behaviour including risk of sexual exploitation Offending behaviour resulting in risk of entering Youth Justice system Continuing drug/alcohol misuse (child or carer) Very low self-esteem High level of emotional/mental health issues Poor skills resulting in social exclusion Parental non-compliance or co-operation Inconsistent parenting affects child's developmental progress including multiple carers Lack of engagement with school/other services Young carers where educational progress is impacted Children in private fostering arrangements	Chronic persistent absence, permanent exclusions or no school place that risks entry to the care system Sexually aggressive behaviour Offending/re-offending Complex mental health issues affecting developmental needs, including self-harm Teenage parent/pregnancy under the age of 16 Evidence of sexual exploitation Frequently missing from home resulting in self neglect Language and communication problems Severely/profound sensory impairment Drug/alcohol use severely impacting development Concealed pregnancy with additional concerns, e.g. domestic abuse, substance misuse risk of parent/child attachment difficulties Forced marriage Trafficking Sexual exploitation	Suspicion of physical, emotional or sexual abuse or neglect Domestic abuse or substance misuse, with clear evidence of effect on child Unborn or newborn child at serious risk due to a range of predisposing factors e.g. children subject of care order, parental substance misuse, parental mental health diagnosis, history of domestic abuse Homeless child/young person Extreme poverty affecting child well-being Parent /child relationship stress requiring care Parental encouragement of abusive/offending behaviour Lack of engagement with services Parental depression caused by the additional needs of caring for a child or young person with a disability Parent or carer convicted of offence against a child Low warmth/high criticism Self harming Mental health issues History with Social Services Previous significant harm MARAC Nepes





## Actions where there are concerns about a child (flowchart)



## Appendix D – Child Protection Records held within Settings

### Child Protection Records held within Settings

This section provides guidance to schools and other educational establishments on record keeping, to enable the designated member of staff with a responsibility for child protection to ensure that all child protection information and concerns are kept in an appropriate and useful manner.

Deficiencies in record keeping have been identified by several child death enquiries as a problem area that requires attention from all agencies.

Good record keeping is essential in safeguarding the welfare of children and young people, particularly with regards to children/young people who are subject to child protection plans or who are identified as vulnerable. For this reason, it is advisable to carry out a regular audit of all child protection information kept in school, to ensure that procedures are being followed correctly.

#### 1. What kind of information should be recorded?

Any member of staff who has a concern about a child should make a written note. This must be passed on to the designated person, (although a personal copy may be kept in a secure place). The note should be timed, dated and signed, with your name printed alongside the signature.

Notes must be made as soon as possible and certainly within 24 hours of the incident giving rise to the concern. (This is important, in case the note is needed for submission to court). Notes do not have to be officially (or beautifully!) presented. The important thing is that they are:

- Factual
- Using a child's own words where possible
- A record of what you saw and heard

Professional opinions are acceptable but only if you state the facts or observations upon which your opinion is based.

If a referral is made to the Assessment Team or Thames Valley Police, Child Abuse Investigation Unit a written record of all concerns held should be sent and a copy of the referral should be kept by the school.

A record should be made of any information, including hearsay and 'nagging doubts', which give you cause for concern about a child. Much of this information may not appear to be very significant on its own, but it could contribute to a 'jigsaw' picture of abuse that should not be ignored. Remember no concern is too small.

Sometimes, things which seem to be insignificant or trivial at the time turn out to be vital pieces of information later.

If there has been no specific incident or information, make a written note. Try to identify what is really making you feel worried. Record these concerns on the same record of concern form for your records.

It is crucial that actions and outcomes are recorded on these forms, including any consultation that has been carried out with any other professionals.

## 2. How should notes and reports be made?

It is impossible to say, at the time of making a child protection note, who will eventually have access to it, or when. It may be consulted months or even years after it was written. Always bear in mind that someone who is a complete stranger to you and your school may need to read your record at some stage in the future.

Ideally, logs of incidents should be typed. If hand written, notes should be clearly legible and written in ink. All notes and reports must contain the following:

- Date of the incident
- Date and time of the record being made
- Name and date of birth of the child(ren) concerned
- A factual account of what happened, and the location where the incident took place (keeping it in the child's words)
- A note of any other people involved e.g. as witnesses
- Questions that the adult asked (remember do not ask leading questions)
- Action taken, and any future plans e.g. monitor and review
- Any other agencies informed:
  - Names,
  - Dates,
  - Times of anyone spoken to.
- Printed name of the person making the record
- Job title of the person making the record
- Signature (print name alongside)

The source of the information should be identified e.g. 'Mrs Bell, a midday supervisor, informed me that...' Or 'I saw John in the playground at break time....'

Information should be factual or based on fact. Record what you saw, heard etc. and try not to be vague or woolly (e.g. 'Jenny was crying and rocking' rather than 'Jenny was upset')

Opinion is acceptable provided that you can give some justification for holding it (e.g. 'Sam ran and hid under the table when his mother arrived to take him home and clung to me when I tried to get him out. He appeared to be frightened.')

Make a note of what you have done with the information (e.g. 'I consulted the Headteacher, Mr Wilson, and he said he would...')

Try to avoid specialist jargon (e.g. 'he is SAP') which someone from another agency would not necessarily understand, but write the information in full (School Action Plus)

### Records and Reports for Child Protection Conferences

Reports prepared for Child Protection Conferences should focus on the child's:

- Educational Progress and Achievements
- Attendance
- Behaviour
- Participation

- Relationships with other children and young people
- Appearance, (where appropriate)
- Interaction with other children and adults

If relevant, reports should include what is known about the child's relationships with his or her family and the family structure. Reports should be objective and based on evidence. They should distinguish between fact, observation, allegation and opinion.

Schools should:

- Make reports available to the child's parents prior to the Child Protection Conference unless to do so would place the child at risk of significant harm
- Provide written reports to the Child Protection Conference
- Arrange for an appropriate person from the school to attend the Child Protection Conference

### **3. Where should child protection information be kept?**

The child protection file should contain all reports, notes and correspondence referring to a child. This should be kept in one secure place e.g. a locked filing cabinet in the Designated Safeguarding Lead's office. Files on extended family members should be kept together and cross-referenced. This file should be kept separate to the child's educational school record.

A note or symbol (e.g. a blue star) should be placed on the cover of the school file for the child, indicating that there is a child protection file relating to the child. All staff who may need to consult the child's school file should be made aware what the symbol means, and whom to consult if they see it.

### **4. Who should have access to child protection information?**

Access to the information on file should be on a need-to-know basis among the staff. This can only be decided on a case-by-case basis. The confidentiality of the child and family should be respected as far as possible, but the welfare of the child is paramount. It would be unlikely that every member of staff would need to know the details of a case. Generally speaking, the closer the day-to-day contact with the child, the more likely the need to know an outline of the case. The school report to the child protection conference should be shared with the parent(s) before the conference takes place. All information must be shared with Social Worker and/or Police and Health, as appropriate, where there is concern that a child is at risk of significant harm.

Child protection information should not ordinarily be shared with agencies other than these statutory agencies e.g. information should not be released to solicitors etc. Where such a request is made, it is best to seek further advice and guidance from the LADO team or relevant local authority.

Child Protection records can be kept on computer and are exempt from the disclosure provisions of the Data Protection Act 1984. For manual records, the Education (School Records) Regulations 1989 exempt information relating to child abuse from the requirement of disclosure. However, in cases of alleged child abuse which come to court, the school may be required to provide its child protection records.

## 5. What should happen to the information when a child leaves the school/ how long should information be kept?

If the child is moving to another school, the complete child protection file should be sent, under separate cover from the regular school file. It should be marked 'Confidential, Addressee Only', and should go to the Head Teacher or designated safeguarding lead of the receiving school. Where a pupil of 16+ years is taking up a college place, the file should be sent to the designated safeguarding lead for the receiving college or further education establishment. All relevant information including nagging doubts should be shared.

Where a pupil leaves with no FE place identified, the file should be retained at the school until the child's 24th birthday. There is no need to keep a copy of material sent to a new school unless, at the discretion of the designated person, there are exceptional reasons for doing so.

The following form, copies onto school headed paper can be used to prove that a CP file has been passed on and accepted by the new setting:

School name:	
Child's name:	
Date:	Person transferring file:
By signing this form, I am confirming that I have received the safeguarding/CP file for the above-named person who is now on role at our setting.	
Print name:	Signature:

**Copies of child protection information should be kept by the final school placement until the child's date of birth + 25 years.**

Information of a child protection nature relating to an allegation against a member of staff, including where the allegation is unfounded, should be kept on a confidential file until the person's normal retirement age or 10 years from the date of the allegation, if that is longer.

## 6. Sharing Information with other Schools/Agencies

Conversations between designated personnel at different schools (e.g. sharing concerns or asking for information about sibling groups) are perfectly acceptable. Where possible, consent from parents should be sought before a conversation takes place. Any relevant child protection information coming to light should be carefully logged.

If a child protection file has been started for a child who then moves school, the entire contents of the file should be sent to the receiving school/college.

The information should be sent separately to the school file, in a sealed envelope to the Headteacher, marked 'Strictly Confidential'.

If a child moves without a forwarding address for home and school and no contact is received from a new school, the county's Missing Pupil Procedures should be followed.

Where a child is removed from roll to be educated at home, the school's child protection file should be copied to the Local Authority as soon as possible.

Remember:

- Monitor the child and record observations as factually as possible.
- A direct disclosure from a child or young person should be referred immediately to the appropriate social work team.

DRAFT

## Appendix E – Safer Recruitment

The principles of Safer Recruitment are an essential foundation to establishing a safe environment for pupils, ensuring those unsuitable to work with children are identified and tackled before they become part of your school community.

**KCSIE 2020 contains a** requirement for all education providers to have in place a Code of Conduct (ODST model available) which support staff to understand acceptable boundaries to their behaviours both onsite and in their daily lives generally including their use of technology and social media.

This should be informed by the revised guidance offered by the Safer Recruitment Consortium - Sept 2019 ("[Guidance for Safer Working Practice for staff working with children and vulnerable adults](#)") and ODST will support both the individual job description and the individual educational settings to ensure this is complied with.

ODST also provides a Safer Recruitment policy that schools should follow to ensure they comply fully with the requirements of **KCSIE 2020**.

### Pre-Employment Checks

Part Three of **KCSIE 2020** clearly details the responsibilities held by schools for ensuring safer recruitment processes are in place and robustly adhered to.

ODST Human Resources officers will support Head Teachers and governors through the safeguarding aspects of the recruitment process.

ODST expects safer recruitment processes to be followed irrespective of who the candidate might be or what schools think you might know of the candidate. ODST officers have suitable resources and materials to support ODST schools through the recruitment process including job descriptions, person specifications and interview/recruitment materials designed to support this aspect.

The Single Central Record (SCR) of a school should provide an auditable means to evidence the principles of safer recruitment have been adhered to i.e. evidence of identity, DBS and Border Agency checks carried out, take-up of references, photographic ID, checks carried out on the Prohibited Orders list, etc. Schools should refer to the ODST guidance on SCRs or seek support from the ODST HR Manager.

When recruiting staff from abroad or who may have worked or qualified overseas, evidence must be retained of the checks carried out to ensure candidates from outside the EEC have a work or other visa for the UK and that, for all candidates, there are no safeguarding concerns in their country of origin or overseas work with children which might preclude the staff member from working with children.

When appointing new staff, schools must:

- verify a candidate's identity;
- obtain (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity – together with a section 128 check for those who will be engaged in management);
- obtain a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available;
- ask relevant staff to self-declare that they are not disqualified under the Childcare Act 2006;
- verify the candidate's mental and physical fitness to carry out their work responsibilities;
- verify the person's right to work in the UK;

- verify professional qualifications, as appropriate;
- check that a person taking up a Governor or management position where it is not possible to carry out a barred list check is not subject to a section 128 direction made by the Secretary of State;
- Schools must ensure that a candidate to be employed to carry out teaching work is not subject to a prohibition order issued by the Secretary of State.

### **Agency and third-party staff (supply staff)**

Schools and colleges must obtain written notification from any agency, or third-party organisation they use that the organisation has carried out the checks (in respect of the enhanced DBS certificate, written notification that confirms the certificate has been obtained by either the employment business or another such business), on an individual who will be working at the school or college that the school or college would otherwise perform.

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by the school or college, the school or college must ensure that all necessary checks are carried out. As trainee teachers are likely to be engaging in regulated activity, an enhanced DBS certificate (including barred list information) must be obtained.

Where trainee teachers are fee-funded, it is the responsibility of the initial teacher training provider to carry out the necessary checks. Schools and colleges should obtain written confirmation from the provider that it has carried out all pre-appointment checks.

### **Volunteers**

A volunteer in respect of whom no checks have been obtained will never be left unsupervised or allowed to work in regulated activity.

Volunteers who, on an unsupervised basis teach or look after children regularly or provide personal care on a one-off basis in schools and colleges, will be in regulated activity. The school should obtain an enhanced DBS certificate (which should include barred list information) for all volunteers who are new to working in regulated activity.

Existing volunteers in regulated activity do not have to be re-checked if they have already had a DBS check (which includes barred list information). However, schools and colleges may conduct a repeat DBS check (which should include barred list information) on any such volunteer should they have concerns.

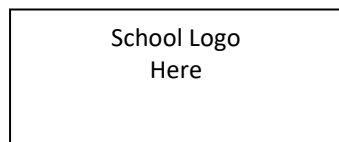
The school should undertake a risk assessment and use their professional judgement and experience when deciding whether to obtain an enhanced DBS certificate for any volunteer not engaging in regulated activity. In doing so they should consider:

- the nature of the work with children;
- what the establishment knows about the volunteer, including formal or informal information offered by staff, parents and other volunteers;
- whether the volunteer has other employment or undertakes voluntary activities where referees can advise on suitability;
- whether the role is eligible for an enhanced DBS check;

Details of the risk assessment should be recorded.



## Appendix F – Briefing Sheet for temporary and supply staff



### For supply staff and those on short contracts in Name school

While working in **Name** school, you have a duty of care towards the children/pupils/pupils here. This means that at all times you should act in a way that is consistent with their safety and welfare. In addition, if at any time you have a concern about a child or young person, particularly if you think they may be at risk of abuse or neglect, it is your responsibility to share that concern with the school designated safeguarding lead (DSL), who is **Name** and can be found **details (photo)**

This is not an exhaustive list, but you may have become concerned as a result of:

- observing a physical injury, which you think may have been non-accidental
- observing something in the appearance of a child or young person which suggests they are not being sufficiently well cared for
- observing behaviour that leads you to be concerned about a child or young person
- a child or young person telling you that they have been subjected to some form of abuse

In any of the circumstances listed here, you must write down what you saw or heard, date and sign your account, and give it to the DSL. This may be the beginning of a legal process – it is important to understand that legal action against a perpetrator can be seriously damaged by any suggestion that the child has been led in any way.

If a child talks to you about abuse, you should follow these guidelines:

- Rather than directly questioning the child, just listen and be supportive
- Never stop a child who is freely recalling significant events, but don't push the child to tell you more than they wish
- Make it clear that you may need to pass on information to staff in other agencies who may be able to help – do not promise confidentiality. You are obliged to share any information relating to abuse or neglect
- Write an account of the conversation immediately, as close to verbatim as possible. Put the date and timings on it and mention anyone else who was present. Then sign it, and give your record to the designated person/child protection officer, who should contact children's social care if appropriate

The school has a policy on safeguarding children and young people which you can find, together with the local procedures to be followed by all staff, in location.

Remember, if you have a concern, discuss it with the DSL.

## APPENDIX G

### Supplementary DfE guidance 27<sup>th</sup> March 2020 during Coronavirus outbreak

It is important that ODST and its schools review and revise this child protection and safeguarding policy and keep it under review as circumstances continue to evolve. Therefore, the policy reflects and puts in place:

- Updated advice received from ODST's local 3 safeguarding partners as prescribed at: <https://www.oxfordshireccg.nhs.uk/> <https://www.eastberkshireccg.nhs.uk/important-information-about-the-coronavirus-covid-19/> <https://www.thamesvalley.police.uk/http://schools.oxfordshire.gov.uk/cms/content/safeguarding> [https://www3.rbwm.gov.uk/info/200168/schools\\_and\\_schooling](https://www3.rbwm.gov.uk/info/200168/schools_and_schooling) .
- Latest Government guidance on safeguarding in relation to the partial re-opening of schools from 1<sup>st</sup> June 2020 <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>. **Refer to Annex G1 for the key actions and needs to be taken account of.**
- Updated advice received from Oxfordshire County Council and RBWM regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need: <https://www.wamlsob.org/about-the-lsrb/new-multi-agency-safeguarding-arrangements/> <https://www.oscb.org.uk/practitioners-volunteers/schools-safeguarding-team/> .
- What staff and volunteers should do if they have any concerns about a child – referenced in the current ODST policy and advice at <https://www.odst.org.uk/> during the coronavirus outbreak.
- The continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns – referenced in the current ODST policy and advice at <https://www.odst.org.uk/> during the coronavirus outbreak.
- DSL (and deputy) arrangements – the Headteacher and normal Designated Safeguarding Lead as deputy at the school.
- The continued importance for school staff to work with and support children's social workers and the local authorities virtual school head (VSH) for looked-after and previously looked-after children – refer to current ODST policy and <https://www.oxfordshire.gov.uk/residents/schools/our-work-schools/virtual-school-looked-after-children-and-care-leavers-0-25> <https://www.afcvirtualschool.org.uk/> .
- Peer on peer abuse - given the very different circumstances schools are operating in. The principles as set out in part 5 of KCSIE should continue to inform our approach) – referenced in the current ODST policy and advice at <https://www.odst.org.uk/>.
- What staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE continue to support how a school responds to any such concerns) – referenced in the current ODST policy and advice at <https://www.odst.org.uk/> .
- Any arrangements to support children the school is concerned about who do not meet the 'vulnerable' definition – referenced in the current ODST policy and advice at <https://www.odst.org.uk/> .
- What arrangements are in place to keep children not physically attending the school or college safe, especially online and how concerns about these children should be progressed; of particular relevance whilst schools are closed and referenced in the current ODST policy and advice at <https://www.odst.org.uk/> .
- Guidance in relation to online safety for children working at home <https://www.gov.uk/guidance/safeguarding-and-remote-education-during-coronavirus-covid-19>

- The importance that all staff and volunteers are aware of the revisions to the current policy and are kept up to date as it is revised. The revised is available publicly <https://www.odst.org.uk/>.

DRAFT

## Exemplar and best practice adjustments pursuant to DfE guidance 27<sup>th</sup> March 2020

During this time of unprecedented closure, this appendix outlines our procedures and practice in relation to keeping children safe during this period.

KCSIE continues to apply at all times, and is additionally guided by the latest version of the Government recommendations in Coronavirus (Covid-19): safeguarding in schools, colleges and other providers.

The ODST Child Protection & Safeguarding Policy continues to remain in place, with the addition of the Government recommendations to guide practice at this unprecedented time, together with the multi-agency and local authority resources linked above. The overview at page 3 of this policy reiterates a number of important safeguarding principles that continue to apply in the DfE's guidance.

### Designated Safeguarding Lead role and availability

- The Designated Safeguarding Lead during the school's closure is/remains: xxxxxxxx Headteacher
- Deputy Designated Safeguarding Leads during school closure are: xxxxxxxxxx
- A Designated Safeguarding Lead is available on call at all times that the school is open for reduced provision, and during normal school opening hours.
- Whilst the DSL is not onsite, the provision leader is responsible for coordinating the safeguarding onsite, and liaising with the DSL.

### Reporting concerns

- Staff with safeguarding concerns should report these in the usual way, alerting the Designated Safeguarding Leads. This includes making a report which can be done remotely. They can call the DSL at any time. Concerns will be escalated in the usual way. Contact with social workers and social services continues as usual.
- Staff should continue to report concerns **immediately**.
- Parents have access to the MASH contact details, DSL email contact and reminders about online safety through our school Home Learning Zone website, which contains a dedicated safeguarding page.
- Childline contact details are available in the foregoing policy.

### Vulnerable Children

- We identify vulnerable children in line with usual school processes, and also because we have a good knowledge of our children and our community.
- We have drawn up a communication plan to ensure we are in regular contact with vulnerable children and families, allowing us to signpost external support or refer to a member of staff in school who can help. Our aim is to provide support and reassurance to families who need it, alongside ensuring our safeguarding duty of care.
- We use our Home School Link Worker to continue contact with the families they support, to ensure best communication.
- Vulnerable children with a social worker are offered a place in the school's reduced provision.

### Attendance

- We monitor attendance of the children in during reduced provision using the new DfE registration requirements. There is no requirement for usual day-to-day attendance processes to follow up on non-attendance, but non-attendance will be followed up afterwards via a telephone conversation and the school will, when communicating with

parents/carers and carers, confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available.

### Staff Training and Safeguarding induction

- All staff within our setting who cover our reduced provision class or who contact parents have up-to-date DBS checks and Generalist Safeguarding Training. Where this becomes out-of-date, we will follow the OSCB guidance on interim arrangements for refresher training, although this is not envisaged to be an issue. Our Single Central Record remains in place as usual, as a record of these checks.

### Safer recruitment

- We maintain safer recruitment checks on all new staff. We recognise the following Government guidance:

*“There is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school or college to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools and colleges to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.”*

### Children moving schools

- Where children move schools to attend reduced provision, we follow the Government guidance outlined in the document above, and the locally agreed guidance from the LADO. This means that the DSL remains overall responsible for the safeguarding of that child, and that the DSL passes on all relevant welfare and child protection information to the host school’s DSL. The receiving institution will be made aware of the reason the child is vulnerable and any arrangements in place to support them. This will ideally happen before a child arrives and, where that is not possible as soon as reasonably practicable.

### Mental Health

- We recognise that negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Teachers are aware of this in setting expectations of pupils’ work where they are at home, and is awaiting Government guidance on expectations regarding home learning.
- For our children in reduced provision, we also ensure appropriate support is in place for them. Children have time to discuss current events where appropriate, to discuss their concerns and worries, and to work through these using resources provided by the provision leader. By keeping this group small, staff in the setting can be vigilant and work with individual children where necessary. This may involve liaison and discussion with our **Emotional Literacy Support Assistants or Home School Link Worker** where appropriate.

### Online Safety

Government guidance on expectations regarding home learning:

<https://www.gov.uk/government/publications/coronavirus-covid-19-online-education-resources>.

In the meantime interim guidance (Appendix H) has been issued by ODST on the use of IT/on-line support to communicate.

- We continue to receive targeted IT support from xxxxx and are in regular contact to ensure safe settings are in place, along with any other technical advice needed to ensure, as much as is reasonably practicable, that our children are safe online at home.
- EYFS and Key Stage 1 learning is available via the particular school's on-line learning platforms, password protected.
- Key Stage 2 children access home learning through their secure Google Profiles, and contact is managed within a Google Classroom environment.
- Google Classrooms are visible by the DSL and Senior Leaders. Staff communicating online with children do not do so on a 1:1 basis. Emails sent are to parents rather than children.
- Key Stage 1 children have less online expectation, and learning is presented on our website, but managed mainly by parents in a more paper-based format.
- Our Home Learning Website has online safety guidance from xxxxxxxxxx, alongside our KS1 and KS2 Acceptable Use Agreements, governing safe use of the internet and the CEOP referral system.
- Our E-Safety policy continues to guide our response to incidents or concerns where necessary.
- The [UK Safer Internet Centre's professional online safety helpline](#) also provides support for the children's workforce with any online safety issues they face.
- All staff have DSL and Deputy DSL mobile numbers in order to contact if they are not on site.
- Staff are reminded of the policy regarding reporting to DSL if anything concerns them during contact with child or families: All referrals to be emailed via DSL through Early Help and MASH team using online form.
- Whilst on site at least two members of teaching staff to supervise children even if numbers are extremely low.
- No volunteers in school during closure.
- School open to children with EHCPs and those with a social worker.
- Contact with children with a social worker every three days via a telephone call if they are self-isolating or not attending.
- Set days given for vulnerable children to come into school during holidays to check in and collect work packs if necessary.
- Information sent to all parents about keeping children safe online while working from home.
- Protocol sent to staff about contacting parents/families during school closure with particular reference to remote teaching and live meetings:
- Live lessons taking place from staff's home subject to appropriate on-line safety measures set out in appendix H.
- Any live storytelling to be through an invite only with a password to join. This should take place in a room where no personal identifying items can be seen (ie photographs of family/addresses etc). This is only being delivered by the Headteacher.
- All teachers have a class email address for parents to send in photographs of work for celebration purposes.
- All parents have been given rules around contacting teachers – between 9 and 3:15pm during the week and with an expectation that they will receive a reply within 24 hours, or within a timescale that has otherwise been agreed with the parents of the school concerned.
- Parents daily reminders (or timescale as otherwise agreed with the parents of the school concerned) to contact ODST, DSL, office staff, Senior Leadership Team or teachers if they have any concerns.

## **Annex G1 - as phased return of pupils begins from 1<sup>st</sup> June 2020**

Based on the new government guidance that has been released this is a summary from the return and some key actions to take into account,

### **Key actions to take into account**

- Ensure your safeguarding policy is reviewed where needed as more children come into school
- Ensure staff know name of DSL(s) and how to contact (each day)
- Risk assessments are in place and link together Safeguarding and Health and Safety
- Ensure safeguarding information remains up to date
- All safeguarding/child protection files are up to date, including actions and outcomes
- DSLs keep up to date with safeguarding issues
- If any of your pupils have been attending other schools/settings you must ensure all information is gathered from the “host” setting
- Vulnerable children with social workers, or EHCPs should continue to attend school
- No need to re-do DBS for staff away from school
- Take into consideration that for many children their mental health may have been impacted
- Schools should continue to do all they 'reasonably' can to ensure children at home are safe online

Below is the link to the latest guidance:

<https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

In taking account of the above, this policy also acknowledges the need:

- to reflect that staff and volunteers may identify new safeguarding concerns about individual children as they see them in person following partial school closures;
- of what staff and volunteers should do if they have any concerns about a child, including new concerns where children are returning;
- for the continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns, including new concerns where children are returning;
- to reflect (where resources allow) that DSLs (and deputies) will have more time to support staff and children regarding new concerns (and referrals as appropriate) as more children return;
- to reflect the importance of ensuring relevant safeguarding and welfare information held on all children (including returning children) remains accurate. Schools and colleges (led by the DSL or deputy) should be doing all they reasonably can to ask parents and carers to advise them of any changes regarding welfare, health and wellbeing that they should be aware of before a child returns;
- to take account of DSL (and deputy) arrangements;
- to take account of peer on peer abuse - given the different circumstances schools and colleges are operating in, a revised process may be required for managing any report of such abuse and supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach);

- to consider what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of [KCSIE](#) will continue to support how a school or college responds to any such concerns);
- to consider the approach to protecting vulnerable children (see below for further details on vulnerable children);
- to consider what arrangements are in place to keep children not physically attending the school or college safe, especially online and how concerns about these children should be progressed (see below for further details covering online safety);
- to note any updated advice received from the local safeguarding partners. DSLs (or deputies) should be leading the school or college's input into the local arrangements;
- to note any updated advice received from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need;
- to note the continued importance for school and college staff to work with and support children's social workers, the local authority virtual school head for looked-after and previously looked-after children and any other relevant safeguarding and welfare partners.

It is important that all staff and volunteers are aware of any new amendments and have read and understand the expectations on them. Staff need to be kept up to date as it is revised.



## APPENDIX H

### Using IT to communicate – some basic considerations

#### Use school channels to communicate

- As always, staff shouldn't communicate with parents or pupils outside school channels (e.g., they shouldn't talk to parents using their personal Facebook accounts, or contact pupils using their personal email addresses or phone numbers).
- If you have expectations with parents already about contacting staff and when they'll get replies, remind them about these. Similarly, remind staff about any expectations you've already set in your code of conduct for communicating with pupils and parents, and staff-pupil relationships.

#### What to do in different scenarios

- A number of platforms are readily available. One popular platform used by a number of ODST schools is Microsoft Teams. However, G Suite and You Tube work equally well, are often free and are easy to use for staff, parents and pupils to access.
- You can use any platform that works for you, and the advice below will still apply.

#### Key Considerations

- If teachers are uploading resources to an open Google Drive(or similar system), ensure there's nothing that can identify pupils in the resources, like their names or comments addressed specifically to them, as anyone with the link can view what's in the Drive.
- If you're using Google Classroom to set work and communicate  
Decide: whether you'll allow pupils to post and comment in the communication 'Stream'; what they can talk about in posts and comments, if allowed to.
- If you allow pupils to comment, tell them they should only be talking about school work in the 'Stream' and that they could be muted (prevented from posting or commenting) for posting anything inappropriate or bullying.
- Consider giving parents the chance to opt-out of their child posting in the 'Stream' too.

#### If broadcasting live, or recording a lesson, staff should consider the following:

- Record against a neutral background.

- Avoid recording in their bedroom if they can (if that's not possible, use a neutral background).
- Dress like they would for school.
- Ensure that pupils are appropriately dressed through good ground rules.
- Double-check what other tabs they have open in their browser, if they're sharing their screen (e.g. no search results for adult content open in another tab).
- Use professional language.
- If staff have a personal account where they've created playlists, consider setting up a separate work account.

**Consider (where appropriate and possible):**

- Set their videos to '**Unlisted**' so that only people who have the link (e.g. parents who you've emailed) will be able to see the video.
- Set the audience as '**Made for kids**', so that adverts won't appear at the start of the video, and comments will be disabled.

**In the child's home:**

- Ask pupils to also be in a shared space in their house, rather than in their bedroom. No pyjamas for pupils either!
- If possible, try to ensure that a child is sitting in a position where background activities can't be seen (eg. sit with his/her back to a wall).
- Ensure that parents who'll also be there are mindful of the fact that other children might see or hear them and what's in the background.
- Consider a basic **"IT Home-School Agreement"** regarding ground rules and protocols set.

**If at all possible, consider:**

- Consider recording live sessions so there's something to go back to later on if you need to, and keep a log of who's doing hangouts and when. Consider checking that parents are happy with you making recordings first - tell them it's for school records only.

**If /when teachers are phoning pupils, consider the following:**

- Do this through parents' phones, particularly in primary school, and in all cases make sure parents are aware and agree.
- Do it in school hours as much as possible.
- Make sure someone else at school/in direct contact is aware and they keep a record of the date and time.
- Have a parent there at the child's end, and have the phone on speaker phone.
- Either use an app like **3cx** that routes calls through your school's number rather than their own, or block their number so parents don't see it (give parents a "heads up" of what time you'll be calling if blocking numbers, so they're more likely to pick up).
- If possible, have another member of staff there. If that's not possible, record the phone call, with parents' permission. Explain you're recording for school records only. If they're using video calling, take the same steps as above.

## APPENDIX I

### 1. Home

#### [Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers](#)

1. [Department for Education](#)

Guidance

#### **Coronavirus (COVID-19): safeguarding in schools, colleges and other providers**

Published 27 March 2020

#### **Contents**

1. [Background](#)
2. [Help and support](#)
3. [Role of the local authority](#)
4. [Safeguarding and clusters](#)
5. [Keeping children safe in schools and colleges](#)
6. [Child protection policy](#)
7. [Designated safeguarding leads \(DSLs\)](#)
8. [Vulnerable children](#)
9. [Attendance](#)
10. [Staff training and safeguarding induction](#)
11. [Children moving schools and colleges](#)
12. [Safer recruitment/volunteers and movement of staff](#)
13. [Mental health](#)
14. [Online safety in schools and colleges](#)
15. [Children and online safety away from school and college](#)

This publication is licensed under the terms of the Open Government Licence v3.0 except where otherwise stated. To view this licence, visit [nationalarchives.gov.uk/doc/open-government-licence/version/3](https://nationalarchives.gov.uk/doc/open-government-licence/version/3) or write to the Information Policy Team, The National Archives, Kew, London TW9 4DU, or email: [psi@nationalarchives.gsi.gov.uk](mailto:psi@nationalarchives.gsi.gov.uk).

Where we have identified any third party copyright information you will need to obtain permission from the copyright holders concerned.

This publication is available at <https://www.gov.uk/government/publications/covid-19-safeguarding-in-schools-colleges-and-other-providers/coronavirus-covid-19-safeguarding-in-schools-colleges-and-other-providers>

## Background

This guidance is relevant to all schools, whether maintained, non-maintained or independent (including academies, academy trusts, free schools and alternative provision academies), maintained nursery schools and pupil referral units.

Where the guidance refers to 'colleges' this includes all of the following:

- further education colleges
- sixth-form colleges
- institutions designated as being in the further education sector
- other further education providers, funded by the Education and Skills Funding Agency, such as 16 to 19 academies and independent learning providers, including special post-16 institutions.

This is interim safeguarding guidance, it is under review and will be updated.

## Help and support

[Advice for the education sector](#) is being updated daily.

The Department for Education COVID-19 helpline, is available to answer questions.

### DfE coronavirus helpline

Email [DfE.coronavirushelpline@education.gov.uk](mailto:DfE.coronavirushelpline@education.gov.uk)

Telephone 0800 046 8687

If you have a query about coronavirus (COVID-19), relating to schools and other educational establishments in England contact our helpline.

Lines are open Monday to Friday from 8am to 6pm and weekends 10am to 4pm.

If you work in a school, please have your unique reference number (URN or UK PRN) available when calling the hotline.

### Role of the local authority

The department is working very closely with all local authorities to ensure that children of critical workers and vulnerable children can, where required, attend a school or college. The department will, via regional school commissioners, continue to support local authorities' crucial responsibilities in maintaining effective safeguarding and child protection services in this challenging time to ensure schools and colleges can access the support they need.

### Safeguarding and clusters

Where schools and colleges collaborate and children and/or staff from multiple settings are clustered in one place, the principles in [Keeping children safe in education \(KCSIE\)](#) and this guidance continue to apply. In particular, the school or college that is acting as the hub in the cluster should continue to provide a safe environment, keep children safe and ensure staff and volunteers have been appropriately checked and risk assessments carried out as required. Additional advice on clusters and safeguarding will be provided in due course.

## Keeping children safe in schools and colleges

KCSIE is statutory safeguarding guidance that schools and colleges should continue to have regard to as per their legislative duty and/or funding agreement requirements.

Whilst acknowledging the pressure that schools and colleges are under, it remains essential that as far as possible they continue to be safe places for children. This guidance supports governing bodies, proprietors, senior leadership teams and designated safeguarding leads (DSLs) so they can continue to have appropriate regard to KCSIE and keep their children safe. It suggests where schools and colleges might consider safeguarding policy and process differently when compared to business as usual.

The way schools and colleges are currently operating in response to coronavirus (COVID-19) is fundamentally different to business as usual, however, a number of important safeguarding principles remain the same:

- with regard to safeguarding, the best interests of children must always continue to come first
- if anyone in a school or college has a safeguarding concern about any child they should continue to act and act immediately
- a DSL or deputy should be available
- it is essential that unsuitable people are not allowed to enter the children's workforce and/or gain access to children
- children should continue to be protected when they are online

Schools and colleges should, as far as is reasonably possible, take a whole institution approach to safeguarding. This will allow them to satisfy themselves that any new policies and processes in response to COVID-19 are not weakening their approach to safeguarding or undermining their child protection policy.

### Child protection policy

Schools and colleges will have an effective child protection policy in place reflecting business as usual. It is likely that the policy will not accurately reflect new arrangements in response to COVID-19. It is important schools and colleges (led by a DSL or deputy, wherever possible) review and revise their child protection policy and keep it under review as circumstances continue to evolve. In some cases, a COVID-19 annex/addendum that summaries any key COVID-19 related changes might be more effective than re-writing and re-issuing the whole policy. Amongst other things the revised child protection policy should reflect:

- any updated advice received from the local 3 safeguarding partners
- any updated advice received from local authorities regarding children with education, health and care (EHC) plans, the local authority designated officer and children's social care, reporting mechanisms, referral thresholds and children in need
- what staff and volunteers should do if they have any concerns about a child
- the continued importance of all staff and volunteers acting and acting immediately on any safeguarding concerns
- DSL (and deputy) arrangements
- the continued importance for school and college staff to work with and support children's social workers and the local authority virtual school head (VSH) for looked-after and previously looked-after children
- peer on peer abuse - given the very different circumstances schools and colleges are operating in a revised process may be required for managing any report of such abuse and

supporting victims (the principles as set out in part 5 of KCSIE should continue to inform any revised approach)

- what staff and volunteers should do if they have concerns about a staff member or volunteer who may pose a safeguarding risk to children (the principles in part 4 of KCSIE will continue to support how a school or college responds to any such concerns)
- any arrangements to support children the school or college are concerned about who do not meet the 'vulnerable' definition
- what arrangements are in place to keep children not physically attending the school or college safe, especially online and how concerns about these children should be progressed

It is important that all staff and volunteers are aware of the new policy and are kept up to date as it is revised. The revised policy should continue to be made available publicly.

### **Designated safeguarding leads (DSLs)**

The optimal scenario for any school or college providing care for children is to have a trained DSL or deputy available on site. It is recognised this may not be possible, and where this is the case there are 2 options to consider:

- a trained DSL or deputy from the school or college can be available to be contacted via phone or online video - for example working from home
- sharing trained DSLs or deputies with other schools or colleges (who should be available to be contacted via phone or online video)

Where a trained DSL or deputy is not on site, in addition to one of the above options, the department recommend a senior leader takes responsibility for co-ordinating safeguarding on site. This might include updating and managing access to child protection files, liaising with the offsite DSL (or deputy) and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

Whatever the scenario, it is important that all school and college staff and volunteers have access to a trained DSL or deputy and know on any given day who that person is and how to speak to them.

It is acknowledged that DSL training is very unlikely to take place during this period (although the option of online training can be explored). For the period COVID-19 measures are in place, a DSL (or deputy) who has been trained will continue to be classed as a trained DSL (or deputy) even if they miss their refresher training.

Every school and college will face unique challenges at this time. Where reasonably possible, the DSL (or deputy) should consider these in a child protection context and reflect them in the child protection policy as appropriate.

### **Vulnerable children**

Ensuring that vulnerable children remain protected is a top priority for the government. Vulnerable children include those who have a social worker and those children and young people up to the age of 25 with EHC plans, read more in the [guidance on vulnerable children and young people](#) for further information.

Local authorities have the key day-to-day responsibility for delivery of children's social care. Social workers and VSHs will continue to work with vulnerable children in this difficult period and should support these children to access this provision. There is an expectation that children with a social

worker will attend provision, unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child.

Senior leaders, especially DSLs (and deputies) know who their most vulnerable children are and have the flexibility to offer a place to those on the edges of receiving children's social care support.

School and college staff should continue to work with and support children's social workers to help protect vulnerable children. This will be especially important during the COVID-19 period.

## **Attendance**

Local authorities and schools do not need to complete their usual day-to-day attendance processes to follow up on non-attendance. Schools/colleges and social workers should be agreeing with families whether children in need should be attending education provision – and the school or college should then follow up on any child that they were expecting to attend, who does not. Schools and colleges should also follow up with any parent or carer who has arranged care for their children and the children subsequently do not attend. To support the above, schools and colleges should take the opportunity when communicating with parents and carers to confirm emergency contact numbers are correct and ask for any additional emergency contact numbers where they are available. In all circumstances where a vulnerable child does not take up their place at school or college, or discontinues, the school or college should notify their social worker.

The department has introduced a [daily online attendance form](#) to keep a record of children of critical workers and vulnerable children who are attending school. This allows for a record of attendance for safeguarding purposes and allows schools to provide accurate, up-to-date data to the department on the number of children taking up places.

## **Staff training and safeguarding induction**

All existing school and college staff will already have had safeguarding training and have read part 1 of KCSIE. The important thing for these staff will be awareness of any new local arrangements so they know what to do if they are worried about a child.

Where new staff are recruited, or new volunteers enter the school or college, they should continue to be provided with a safeguarding induction. An up to date child protection policy (described above) will support this process as will part 1 of KCSIE.

The existing school and college workforce may move between schools and colleges on a temporary basis in response to COVID-19. The receiving school or college should judge, on a case-by-case basis, the level of safeguarding induction required. In most cases, the existing workforce will already have received appropriate safeguarding training and all they will require is a copy of the receiving setting's child protection policy, confirmation of local processes and confirmation of DSL arrangements.

## **Children moving schools and colleges**

It will be important for any school or college whose children are attending another setting to do whatever they reasonably can to provide the receiving institution with any relevant welfare and child protection information. This will be especially important where children are vulnerable. For looked-after children, any change in school should be led and managed by the VSH with responsibility for the child. The receiving institution should be aware of the reason the child is vulnerable and any arrangements in place to support them. As a minimum the receiving institution should, as appropriate, have access to a vulnerable child's EHC plan, child in need plan, child

protection plan or, for looked-after children, their personal education plan and know who the child's social worker (and, for looked-after children, who the responsible VSH is). This should ideally happen before a child arrives and, where that is not possible as soon as reasonably practicable. Any exchanges of information will ideally happen at DSL (or deputy) level, and likewise between special educational needs co-ordinators/named individual with oversight of SEN provision for children with EHC plans. However, it is acknowledged this may not always be possible. Where this is the case senior leaders should take responsibility.

Whilst schools and colleges must continue to have appropriate regard to data protection and GDPR they do not prevent the sharing of information for the purposes of keeping children safe. Further advice about information sharing can be found at paragraphs 82-86 of KCSIE.

### **Safer recruitment/volunteers and movement of staff**

It remains essential that people who are unsuitable are not allowed to enter the children's workforce or gain access to children. If schools and colleges are recruiting new staff, they should continue to follow the relevant safer recruitment processes for their setting, including, as appropriate, relevant sections in part 3 of KCSIE. In response to COVID-19, the Disclosure and Barring Service (DBS) has made changes to its [guidance on standard and enhanced DBS ID checking](#) to minimise the need for face-to-face contact.

Where schools and colleges are utilising volunteers, they should continue to follow the checking and risk assessment process as set out in paragraphs 183-187 of KCSIE. Under no circumstances should a volunteer who has not been checked be left unsupervised or allowed to work in regulated activity.

Regarding members of the school or college workforce already engaging in regulated activity and who already have the appropriate DBS check, there is no expectation that a new DBS check should be obtained where that member of the workforce temporarily moves to another school or college to support the care of children. The type of setting on the DBS check, for example a specific category of school, is not a barrier. The same principle applies if childcare workers move to work temporarily in a school setting. The receiving institution should risk assess as they would for a volunteer (see above). Whilst the onus remains on schools and colleges to satisfy themselves that someone in their setting has had the required checks, including as required those set out in part 3 of KCSIE, in the above scenario this can be achieved, if the receiving institution chooses to, via seeking assurance from the current employer rather than requiring new checks.

Schools and colleges must continue to follow their legal duty to refer to the DBS anyone who has harmed or poses a risk of harm to a child or vulnerable adult. Full details can be found at paragraph [179-180](#) of KCSIE.

Schools and colleges should continue to consider and make referrals to the Teaching Regulation Agency (TRA) as per [paragraph 182](#) of KCSIE and the TRA's '[Teacher misconduct advice for making a referral](#)'. During the COVID-19 period all referrals should be made by emailing [Misconduct.Teacher@education.gov.uk](mailto:Misconduct.Teacher@education.gov.uk). All referrals received by the TRA will continue to be considered. Where referrals on serious safeguarding matters are received and it is deemed that there is a public interest in doing so consideration will be given as to whether an interim prohibition order (IPO) should be put in place. The TRA will continue to progress all cases but will not schedule any hearings at the current time.

Whilst acknowledging the challenge of the current environment, it is essential from a safeguarding perspective that any school or college is aware, on any given day, which staff/volunteers will be in the school or college, and that appropriate checks have been carried out, especially for anyone engaging in regulated activity. As such, schools and colleges must continue to keep the single central



record (SCR) up to date as outlined in paragraphs 164-172 in KCSIE. The SCR can, if a school or college chooses, provide the means to log everyone that will be working or volunteering in a school or college on any given day, including any staff who may be on loan from other institutions. The SCR can also, if a school or college chooses, be used to log details of any risk assessments carried out on volunteers and staff on loan from elsewhere.

## **Mental health**

Negative experiences and distressing life events, such as the current circumstances, can affect the mental health of pupils and their parents. Teachers should be aware of this in setting expectations of pupils' work where they are at home. The department is providing separate guidance on providing education remotely.

Where they are providing for children of critical workers and vulnerable children on site, schools and colleges should ensure appropriate support is in place for them. Our guidance on mental health and behaviour in schools (which may also be useful for colleges) sets out how mental health issues can bring about changes in a young person's behaviour or emotional state which can be displayed in a range of different ways, and that can be an indication of an underlying problem. Support for pupils and students in the current circumstances can include existing provision in the school (although this may be delivered in different ways, for example over the phone) or from specialist staff or support services. You can read the guidance on [mental health and behaviour in schools](#).

## **Online safety in schools and colleges**

It will be more important than ever that schools and colleges provide a safe environment, including online. Schools and colleges should continue to ensure that appropriate filters and monitoring systems (read [guidance on what "appropriate" looks like](#)) are in place to protect children when they are online on the school or college's IT systems or recommended resources. Schools and colleges should consider who in their institution has the technical knowledge to maintain safe IT arrangements. Schools and colleges should also consider what their contingency arrangements are if their IT staff become unavailable.

The [UK Council for Internet Safety provides information to help governing boards and proprietors assure themselves](#) that any new arrangements continue to effectively safeguard children online.

The [UK Safer Internet Centre's professional online safety helpline](#) also provides support for the children's workforce with any online safety issues they face. Local authorities may also be able to provide support.

## **Children and online safety away from school and college**

All schools and colleges should be doing what they reasonably can to keep all of their children safe. In most cases, the majority of children will not be physically attending the school or college. It is important that all staff who interact with children, including online, continue to look out for signs a child may be at risk. Any such concerns should be dealt with as per the child protection policy and where appropriate referrals should still be made to children's social care and as required the police.

The department is providing separate guidance on providing education remotely. It will set out 4 key areas that leaders should consider as part of any remote learning strategy. This includes the use of technology. Recently published [guidance from the UK Safer Internet Centre on safe remote learning](#) and from the [London Grid for Learning on the use of videos and livestreaming](#) could help plan online lessons and/or activities and plan them safely.

All schools and colleges should consider the safety of their children when they are asked to work online. The starting point for online teaching should be that the same principles as set out in the school's or college's staff behaviour policy (sometimes known as a code of conduct). This policy should amongst other things include acceptable use of technologies, staff pupil/student relationships and communication including the use of social media. The policy should apply equally to any existing or new online and distance learning arrangements which are introduced. Schools and colleges should, as much as is reasonably possible, consider if their existing policies adequately reflect the new reality of so many children (and in some cases staff) working remotely online. As with the child protection policy, in some cases an annex/addendum summarising key COVID-19 related changes may be more effective than re-writing/re-issuing the whole policy. The principles set out in the [guidance for safer working practice for those working with children and young people in education settings published by the Safer Recruitment Consortium](#) may help schools and colleges satisfy themselves that their staff behaviour policies are robust and effective. In some areas schools and colleges may be able to seek support from their local authority when planning online lessons/activities and considering online safety.

Schools and colleges should ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

An essential part of the online planning process will be ensuring children who are being asked to work online have very clear reporting routes in place so they can raise any concerns whilst online. As well as reporting routes back to the school or college this should also signpost children to age appropriate practical support from the likes of:

- [Childline](#) - for support
- [UK Safer Internet Centre](#) - to report and remove harmful online content
- [CEOP](#) - for advice on making a report about online abuse

Schools and colleges are likely to be in regular contact with parents and carers. Those communications should be used to reinforce the importance of children being safe online. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the school or college (if anyone) their child is going to be interacting with online.

Parents and carers may choose to supplement the school or college online offer with support from online companies and in some cases individual tutors. In their communications with parents and carers, schools and colleges should emphasise the importance of securing online support from a reputable organisation/individual who can provide evidence that they are safe and can be trusted to have access to children. Support for parents and carers to keep their children safe online includes:

- [Internet matters](#) - for support for parents and carers to keep their children safe online
- [London Grid for Learning](#) - for support for parents and carers to keep their children safe online
- [Net-aware](#) - for support for parents and carers from the NSPCC
- [Parent info](#) - for support for parents and carers to keep their children safe online
- [Thinkuknow](#) - for advice from the National Crime Agency to stay safe online
- [UK Safer Internet Centre](#) - advice for parents and carers

The department encourages schools and colleges to share this support with parents and carers.