

# Child protection and safeguarding policy and procedure (including safer recruitment, allegations against staff and low-level concerns)

## The Colleton Primary School



**Approved by:** Full Governing Body

**Date:** 20<sup>th</sup> September 2023

**Last reviewed in:** September 2023

**Next review due by:** September 2024

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## 1. Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Mrs Michelle Law	<a href="mailto:head@colleton.wokingham.sch.uk">head@colleton.wokingham.sch.uk</a> 01189 340530
Deputy DSL	Ms. Vanessa Neale	<a href="mailto:vanessa.neale@colleton.wokingham.sch.uk">vanessa.neale@colleton.wokingham.sch.uk</a> 01189 340530
Deputy DSL	Ms Gillian Trinh-Frost	<a href="mailto:gillian@colleton.wokingham.sch.uk">gillian@colleton.wokingham.sch.uk</a> 01189 340530
Deputy DSL	Ms Nisia Sargood	<a href="mailto:Nisia.Sargood@colleton.wokingham.sch.uk">Nisia.Sargood@colleton.wokingham.sch.uk</a> 01189 340530
Deputy DSL	Ms Kelly Middleditch	<a href="mailto:kelly.middleditch@colleton.wokingham.sch.uk">kelly.middleditch@colleton.wokingham.sch.uk</a> 01189 340530
Local authority designated officer (LADO)	Email; <a href="mailto:LADO@wokingham.gov.uk">LADO@wokingham.gov.uk</a> Now Nominated Officer for LA (NOLA)	0118 974 6141
Chair of governors	Mrs Bridget Ditcham	<a href="mailto:bridget.ditcham@colleton.wokingham.sch.uk">bridget.ditcham@colleton.wokingham.sch.uk</a>
Safeguarding and Prevent governor	Mrs Bryony Harding	<a href="mailto:bryony.harding@colleton.wokingham.sch.uk">bryony.harding@colleton.wokingham.sch.uk</a>
Referral and Assessment Team – WBC Children’s Social Care	Email: <a href="mailto:triage@wokingham.gov.uk">triage@wokingham.gov.uk</a>	0118 908 8002
Berkshire West Safeguarding Childrens Partnership (BWSCP)		<a href="http://www.berkshirewestsafeguardingchildrenpartnership.org.uk">www.berkshirewestsafeguardingchildrenpartnership.org.uk</a>
ARC Information and Counselling Service	35 Reading Road Wokingham Berkshire RG41 1EG	<a href="http://www.arcweb.org.uk">http://www.arcweb.org.uk</a>
Channel helpline		020 7340 7264
NSPCC helpline		0808 800 5000
Department of Education helpline (extremism)		0207 340 7264

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Anti-terrorist helpline		0800 789 321

## 2. Definition of safeguarding

Taken from Working Together to Safeguard Children (2018) - Safeguarding children and young people is defined as:

- Protecting children from maltreatment
- Preventing impairment of children's health and development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes Child protection is understood to be actions taken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is defined as treating with cruelty or violence, especially regularly or repeatedly, and may involve inflicting harm or failing to act to prevent harm.

It is important that everyone at the Colleton Primary School understands their responsibilities under Working Together to Safeguard Children (2018) and the latest Keeping Children Safe in Education (KCSIE) document in order to safeguard children and prevent them from coming to harm. Every member of staff must read part 1 of KCSIE and annex A and B and the latest Guidance for Safer Working Practice.

## 3. Equality, diversity and inclusion

Some children have an increased risk of abuse, these children may have difficulty recognising or disclosing abuse. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face, for example as a result of: special educational needs or disability; gender or sexuality based issues; ethnicity or religion. These are protected characteristics under the Equality Act 2010 and the Human Rights Act 1998.

We also recognise that children living in other circumstances may also be at an increased risk of abuse (including online) including young carers, those who have English as an additional language, those who are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence, those at risk of FGM, sexual exploitation, forced marriage, or radicalisation, asylum seekers, are at risk due to either their own or a family member's mental health needs, are looked after or previously looked after children, are absent from education especially for prolonged periods or repeatedly, and those whose family has expressed an intention to remove them from school to be home educated.

## 4. Safeguarding knowledge

To support our culture of safeguarding, it is vital that you understand that safeguarding action may be needed to protect our children from (and not limited to) the abuse in the list below. Regular training is provided so that you know what to look for to help prevent or report the abuse that children may be suffering. You can also follow the hyperlinks for more information:

- [Neglect](#)
- [Physical Abuse](#)
- [Sexual Abuse](#)
- [Emotional Abuse](#)
- [Bullying, including online bullying and prejudice-based bullying](#)

- [Racist, disability and homophobic or transphobic abuse](#) (Hate Crimes)
- [Gender-based violence](#)
- Child on Child/[Peer-on-peer abuse](#) such as sexual violence and harassment – See appendix 2 for further information.
- [Radicalisation and/or extremist behaviour](#)
- [Child sexual exploitation](#) and [trafficking](#)
- [Child criminal exploitation](#) including county lines
- [Serious violent crime](#)
- [Online abuse](#): Risks linked to using technology and social media, including online bullying; the risks of being groomed online for exploitation or radicalisation and risks of accessing and generating inappropriate content, for example ‘sexting’
- [Grooming](#)
- [Teenage relationship abuse](#)
- [Upskirting](#)
- [Sexting \(or sharing of nudes/semi-nudes\)](#)
- [Substance misuse](#)
- Issues that may be specific to a local area or population, for example gang activity or youth violence
- [Domestic Abuse](#) – in order to support children and families experiencing this The Milestone School has signed up to Gloucester Encompass protocol.
- [Female genital mutilation](#)
- [Forced marriage](#)
- [Poor parenting](#)
- [Homelessness](#)
- [So-called honour based violence](#)

Make sure you are familiar with the signs that a child may be experiencing abuse. IF YOU ARE NOT SURE – JUST ASK. You also need to understand that safeguarding also includes broader aspects of care and education including: children’s health and safety, their wellbeing including their mental health.

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

- The local authority (LA)
- Integrated Care Board for an area within the LA
- The chief officer of police for a police area in the LA area

Any references in the subsequent sections to DSL means the DSL or Deputy DSL.

## 5. Roles and responsibilities

Safeguarding and child protection is **everyone’s** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and

procedures also applies to extended school and off-site activities and any incidents that occur on school premises even if ran by external organisations/persons.

### **5.1 All staff**

Staff will:

- be aware of our systems which support safeguarding, including this child protection and safeguarding policy, the staff Code of Conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, our E-safety policy/procedure, the expectations, applicable roles and responsibilities in relation to filtering and monitoring, and the safeguarding response to children who go missing from education
- The early help process
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

### **5.2 The designated safeguarding lead (DSL)**

The DSL is a member of the senior leadership team. Our DSL is Mrs Michelle Law; Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes online safety, and understanding our filtering and monitoring processes on school devices and school networks to keep pupils safe online.

Please use [head@colleton.wokingham.sch.uk](mailto:head@colleton.wokingham.sch.uk) or 0118934530 or the mobile telephone number shared with all staff. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. When the DSL is absent, the Deputy designated safeguarding leads, Ms Vanessa Neale or Ms Gillian Trinh-Frost– will act as cover. If the DSL and DDSL's are offsite staff will make contact with the DSL or DDSL's via mobile telephone.

### **5.3 The governing body**

The governing body will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation

- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Make sure:
  - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
  - The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 1 of this policy covers this procedure
  - That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised
  - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies
- Review the DfE's filtering and monitoring standards, and discuss with IT staff and service providers about what needs to be done to support the school to meet these standards
- Make sure the DSL takes lead responsibility for understanding the filtering and monitoring systems in place as part of their role
- Make sure that all staff undergo safeguarding and child protection training, including online safety and that such training is regularly updated and is in line with advice from the safeguarding partners
- Make sure staff understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training

Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

The chair of governors will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education in its entirety.

#### **5.4 The headteacher**

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

Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding as part of their induction including online safety and this policy
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to families when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent

- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 2)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person and overseeing the safe use of technology, mobile phones and cameras in the setting.

## 6. Support from school

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

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
  - Healthy and respectful relationships
  - Boundaries and consent
  - Stereotyping, prejudice and equality
  - Body confidence and self-esteem
  - How to recognise an abusive relationship (including coercive and controlling behaviour)
  - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
  - What constitutes sexual harassment and sexual violence and why they're always unacceptable

### Early Help

The school aim to prevent abuse causing trauma to children and so provide an early help pathway to support children and their families. This help could be any of the following: Benefits Advice, Family Counselling (subject to availability), Parent/Family cafe / social groups / siblings groups, details of out of school and holiday activities, Parent Workshops. The DSL manages the school's offer of early help – if you feel a family or child would benefit please ask.

### Referral

If a child or young person discloses abuse where possible any onward referral will be made with the consent of the family provided this does not put the child or young person at further risk.

## 7. Related policies

All staff and governors must be aware of the suite of policies we have in place to carry out the care and education of our children. These are: allegations of abuse against staff (appendix 2), Anti-bullying, Attendance, Data Protection, E-Safety, First Aid, Health and Safety, Medical needs, Personal Care, Physical Intervention, Prevent, SEND, Volunteer and Whistleblowing Policy. These are provided for all staff during induction, with the member of staff responsible for induction ensuring that staff understand the relevant content for the role – please ask if you have any questions about these. They are available for reference in



the whole school Teams folder. Staff are also required to read these together with the Staff Code of Conduct.

When the policies are updated they will be uploaded into the Admin Teams folder and an email will be sent to all staff advising of the policies which have been updated. All staff are required to familiarise themselves and act in line with the updated policies and ask if they have any questions.

## 8. Confidentiality

While it is recognised that all matters relating to safeguarding individual children are confidential, staff must never guarantee confidentiality to that pupil as this may not be in the child's best interests.

Where there is a Child Protection concern it will be passed immediately to the DSL who will contact the Children's Services or the Local Authority Designated Officer (LADO) if appropriate, AKA Nominated Officer for LA

The family of the child should be informed immediately unless it is felt that this would not be in the best interests of the child, would place them at further risk or where it is believed a crime may have been committed.

Personal information about a pupil, including the level of involvement of other agencies, will only be disclosed to other members of staff only on a '**need to know**' basis: you do not need consent to share information if a child is suffering, or at risk of, serious harm.

All staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children. Timely information sharing is essential to effective safeguarding. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

## 9. Recognising abuse and taking action

Indicators of abuse If you think a child is being abused, you must pass this on to the Designated Safeguarding Lead in person. The following might indicate that a child is being abused. Further information can be found on the NSPCC website

- Unexplained changes in behaviour or personality
- Becoming withdrawn
- Seeming anxious
- Becoming uncharacteristically aggressive
- Evidence of a poor relationship with a parents
- Knowledge of adult issues
- Running away or going missing from home
- Bruising
- Unexplained weight loss

- Unexplained or regular missing from school episodes.

Children are often not able to tell that they are being abused so you must be vigilant to signs that a child might have been harmed. IF YOU ARE NOT SURE – JUST ASK.

### 9.1 If a child is in immediate danger

Make a referral to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone can make a referral.**

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

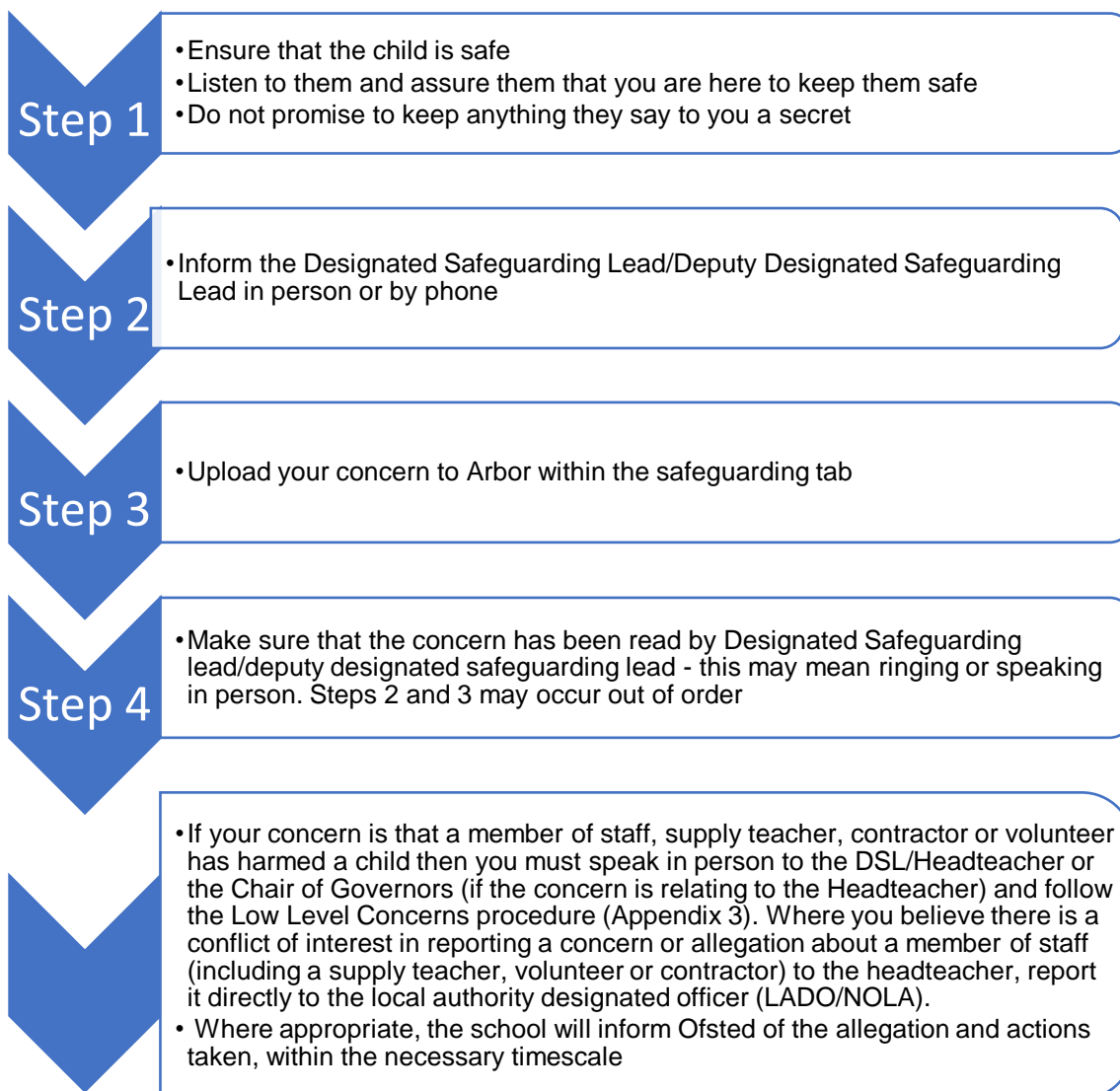
**If you have any worries about a child or young person who you feel is being ill-treated, abused or neglected you should speak with the School's Designated Safeguarding Lead or their Deputy in the first instance. If it is an immediate concern and they are unavailable, Children's Services should be contacted directly as children and their parents may need help urgently.**

**All immediate concerns should be discussed with the MASH team at Childrens Services. ([triage@wokingham.gov.uk](mailto:triage@wokingham.gov.uk). Telephone number: 0118 908 8002).**

<https://www.gov.uk/report-child-abuse-to-local-council>

### 9.2 If a child makes a disclosure to you

What to do If you have a concern about a child,



If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

Children and Young People Children who are at risk of significant harm are often placed on a child protection plan (Section 47) or child in need plan (Section 17) these are determined by the Children Act 1989 and 2004. Children can also be removed from the care of their parents (LAC or CIC). Children who have this level of child protection need are likely to have experienced trauma or adverse childhood experiences (ACES). Please be aware of this when you are working with the children in our school. If a child or young person chooses to disclose current or past abuse to you it is likely that they see you as a trusted adult with whom they have a good relationship.

All staff should:

- Treat children with care and respect, honouring their confidence by ensuring that you only share the information with a member of the safeguarding team.

- Reassure them that you will do whatever you can to help and this will mean you cannot keep the information a secret.
- Listen to and believe them.
- Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next
- Listen very carefully so you can record the conversation verbatim
- As soon as possible you should write up the conversation in the child's own words, then record this on Arbor using full names of children and staff. Stick to the facts, and do not put your own judgement on it

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

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

### 9.3 If you discover that FGM has taken place or a pupil is at risk of FGM

**Any teacher** who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth

should immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

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

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

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

**Any member of staff** who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out must speak to the DSL and follow our local safeguarding procedures.

### 9.4 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

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

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

### **9.5 If you have a mental health concern**

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

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

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 9.2.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action. Refer to the Department for Education guidance on [mental health and behaviour in schools](#) for more information.

### **9.6 Allegations of abuse made against other pupils/ Child-on-child abuse**

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils. Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, that doesn’t mean that this kind of abuse isn’t happening.

We also recognise the gendered nature of child-on-child-abuse. However, all child-on-child-abuse is unacceptable and will be taken seriously.

This type of abuse can take place inside and outside of school and online. It can also take place both face-to-face and online and can occur simultaneously between the 2.

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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as ‘teenage relationship abuse’)
- Physical abuse (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- ⊖ Sexual violence
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- ⊖ Causing someone to engage in sexual activity without consent
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- ⊖ Upskirting
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

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

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

You must record the allegation and tell the DSL, but do not investigate it

The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s).

The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.

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

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child-abuse, and know how to identify it and respond to reports
- That even if there are no reports of child-on-child-abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
- That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
  - Children can show signs or act in ways they hope adults will notice and react to
  - A friend may make a report
  - A member of staff may overhear a conversation
  - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone
- That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child-abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn’t (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children’s social care to determine this
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

### **9.7 Sharing of nudes and semi-nudes (‘sexting’)**

This is a suggested approach based on guidance from the UK Council for internet safety. Please follow this link for further information: [guidance from the UK Council for Internet Safety](#). All staff need to know what this is and what to do should they come across an example within school or are informed of the behaviour in a household by one of our pupils.

#### **Your responsibilities when responding to an incident**

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

- View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the pupil to delete it
- Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL’s responsibility)
- Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved

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

### **Initial review meeting**

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

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

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

### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate).

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

### **Informing families**

The DSL will inform families at an early stage and keep them involved in the process, unless there is a good reason to believe that involving them would put the pupil at risk of harm.

### **Referring to the police**

If it is necessary to refer an incident to the police, this will be done through 101 (Thames Valley Police).



## Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

## Curriculum coverage

Pupils are taught about the issues surrounding the sharing of inappropriate images and computing programmes. However, as a primary school we do not teach in relation to the sharing of nudes and semi-nudes. Pupils also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images

This policy on the sharing of inappropriate images is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

## 9.8 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Teach children to share their concerns with an adult in school that they trust through assemblies and PSRHE.

## 10. Online safety and the use of mobile technology

Children in our school are protected in their use of the internet through our filtering and monitoring system provided by Inspired ICT solutions. We carefully monitor this to ensure that any breach is addressed and so that harmful content is blocked within the school. We also ensure that children are not able to access mobile phone networks by Inspired ICT solutions. Further information can be found in the E-Safety policy which all staff are familiar with and is published on our website.

### Use of mobile devices

- Learners are not allowed to bring mobile phones or other electronic devices such as Kindles, tablets or iPads to school unless prior arrangements are made with the school and the device must be handed to their registration teacher for safe-keeping each day.
- Pupils are not allowed to bring in games devices including those on watches, such as Vtech or similar.
- Teacher/family contact should normally be by the main school telephone or office email and not via a mobile device except where off-site activities dictate the use of a mobile phone.
- Helpers in school and staff must ensure that they do not send or receive personal messages, either audio or text, during contact time with pupils. If an exceptional emergency arises they should arrange temporary cover whilst they make a call.
- Staff, helper and visitor mobile devices should be switched off or on silent during the times that children are present. This includes notifications on smart watches.
- No device in any of the school buildings should contain any content that is inappropriate or illegal.

- Mobile phones and watches enabled with similar functionality should only be used in the office, staff room or PPA room during normal school hours.

### **Photography of pupils - general**

- Learners' full names will not be used in conjunction with photographs on the public part of Microsoft Teams, social media or school website.
- Only photographs of learners whose families have given permission for them to appear on our website or in social media will be used.
- Staff will check the Photograph list to ensure that no photograph of a learner without permission is used.
- Names can be used in conjunction with photos on the password protected parts of Microsoft Teams.
- Where possible school devices should be used for work. Where this is not possible and staff personal devices are being used for school purposes, consideration must be given to the security of images/data in case of loss of the device e.g. photos should be downloaded in school and removed from the camera or memory card.
- Photographs are to be kept on Microsoft Teams organised by academic year with subfolders for each team and one for staff. Using this system photographs can and will be easily deleted within a year of the children leaving Older Team.
- Photographs taken by the newspaper have families' permission to publish names unless included on the Photograph list.

### **Photography of pupils – Families**

- Families may take photographs of their children during sports events and following any performances but they should not be posted on social networking sites with permissions set to public.

## **11. Notifying families**

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the families of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's families, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed
- Meet with the alleged perpetrator's families to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

## 12. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEND) or disabilities or certain health conditions can face additional safeguarding challenges and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

We offer extra pastoral support for these pupils.

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputies) and the SENCO.

## 13. Pupils with a social worker

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

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

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

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

## 14. Looked-after and previously looked-after children

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

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

We have appointed a designated teacher, Mrs Michelle Law, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with [statutory guidance](#).

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to

- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

## 15. Complaints and concerns about school safeguarding policies

### 15.1 Complaints against staff

Complaints against staff that are likely to require a child protection investigation will be handled in accordance with our procedures for dealing with allegations of abuse made against staff (see appendix 3).

### 15.2 Other complaints

All other complaints relating to pupils behaviour or the behaviour of their families should be brought to the attention of the Headteacher as soon as possible, or in the absence of the Headteacher, the Deputy Headteacher.

### 15.3 Whistle-blowing

We have a robust Whistle-blowing Policy, adapted from Wokingham Borough Council. This is on the website and a paper copy is displayed in the staffroom for team members to access easily if they have a concern or complaint about a member of staff in school.

## 16. Record-keeping

The school uses Arbor to record all safeguarding incidents. Staff should ensure that they have a login for this and know how to record incidents – especially the detail that is required. Safeguarding incidents require sensitivity and confidentiality. Staff should not share information with anyone other than the safeguarding leads unless asked to do so by them. If staff are unsure any of the safeguarding team will help.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded as soon as possible, securely and separately from the main pupil file.

To allow the new school to have support in place when the child arrives, this should be within:

- **5 days** for an in-year transfer, or within
- **The first 5 days** of the start of a new term

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

## 17. Training

All staff receive regular training in safeguarding and online safety including a yearly update through INSET training and staff briefing updates. This training will include an understanding of the expectations, roles and responsibilities for staff around filtering and monitoring. In addition, every member of staff and governor should carry out the government's online Prevent training to address issues of radicalisation.

Should you be concerned about a child please discuss this with the safeguarding team in the first instance. All safeguarding leaders have received enhanced safeguarding training and ensure that they keep themselves up to date with current safeguarding issues. The enhanced training is renewed every two years. All safeguarding training is recorded so that we know who has received what training.

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

## 18. Monitoring arrangements

This policy and our E-safety policy will be reviewed regularly and approved **annually** by The Safeguarding Governor and the Senior Leadership Team before being shared with the Full Governing Body and approved annually.

**If you would like any further information about anything in this policy, please ask one of the safeguarding leaders.**

## Appendix 1: Safer Recruitment and DBS checks

We will adhere to our staff recruitment policy regarding safer recruitment and DBS checks and our volunteer policy.

### Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:

- We believe the individual has engaged in [relevant conduct](#); or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

### Agency and third-party staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check that the person presenting themselves for work is the same person on whom the checks have been made.

### Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.

We will check the identity of all contractors and their staff on arrival at the school.

For self-employed contractors such as music teachers or sports coaches, we will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought.

### Trainee/student teachers

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out.

Where trainee teachers are fee-funded, we will obtain written confirmation from the training provider that necessary checks have been carried out and that the trainee has been judged by the provider to be suitable to work with children.

In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

### **Governors**

All governors will have an enhanced DBS check without barred list information.

They will have an enhanced DBS check with barred list information if working in regulated activity.

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

All proprietors, trustees, local governors and members will also have the following checks:

A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)).

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

All governors will also have the following checks:

Identity

Right to work in the UK

Other checks deemed necessary if they have lived or worked outside the UK

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## Appendix 2: allegations of abuse made against staff

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

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has:

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

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

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

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

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

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

### Definitions for outcomes of allegation investigations

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

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



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

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

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

### Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Employees will be encouraged to seek support from trade union representatives, or a colleague, for example for welfare counselling or medical advice

Inform the family of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the family of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any family who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

- Keep the family of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

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

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

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

### **Timescales**

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

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

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

### **Specific actions**

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

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### **Individuals returning to work after suspension**

If it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this.

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

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

If a report is:

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

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

If an allegation is:

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

### **Confidentiality and information sharing**

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

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

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

## Record-keeping

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

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

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

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

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

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

## References

When providing employer references, we will:

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

## Learning lessons

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

This will include consideration of (as applicable):

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

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

## Non-recent allegations

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

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

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

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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers, and contractors, which do not meet the harm threshold set out in section 1 above.

- Concerns may arise through, for example:
- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, family or other adult within or outside the school
- Pre-employment vetting checks

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

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

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

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

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

We will create this culture by:

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

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

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct and disciplinary policies. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

Keeping Children Safe in Education also links to this report for more information [Developing and implementing a low-level concerns policy: A guide for organisations which work with children](#)

### **Record keeping**

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken. Advice may be sought from Wokingham Borough Council Human Resources

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

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

### **References**

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

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

## Appendix 3: specific safeguarding issues

### Non-collection of children

If a child is not collected at the end of the session/day, we will:

- Ensure the child stays safely with their class teacher
- Telephone all contacts
- Report to Children's Services if we have no contact and the child has not been collected within half an hour after the session has ended

### ➤ Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will follow our Children Missing in Education Policy in Partnership with Wokingham Borough Council Children's Services.