



Orleton CE Primary School



Kimbolton St James CE Primary School

CHILD PROTECTION & SAFEGUARDING POLICY SUITE

This policy will be reviewed and updated by the Governing Body at least annually.
All references to 'the school' imply both Orleton and Kimbolton Primary Schools.

Date signed off by Full Governing Body: September 2023

Signed Adam Breakwell, Headteacher

Sallie Peacock, Orleton Chair of Governors

Will Mears, Kimbolton Chair of Governors

Date next review due: September 2024

Introduction

Our vision is rooted in 1 Corinthians 16:13-14: 'Keep alert, stand firm in your faith, be courageous, be strong. Let all that you do be done in love.' To this end, we encourage a broad and respectful understanding of the diversity that makes up modern Britain, contributing to a school atmosphere in which children feel safe, valued and respected, and able to talk to staff if they have any concerns, big or small. We believe that this is one of the most positive things we can do to safeguard our pupils and give them the courage and self-esteem to let us know if they are being neglected, abused, or groomed.

Child protection and safeguarding are everyone's responsibility. This suite of policies provides a framework to ensure that children remain safe while being given the freedoms and access to opportunities they need to work, grow and flourish together. It ensures that everyone (including staff, volunteers and governors) who works regularly in school and as part of extended school or off-site activities has the information and skills to enable them to keep children safe and well by:

- promoting a positive and inclusive culture that supports our aim to 'let all that you do be done in love';
- recognising at as early a stage as possible issues that may affect a child's mental and physical wellbeing or development;
- understanding and taking the appropriate action in a timely manner.

This suite of policies does not duplicate Keeping Children Safe in Education; it supplements it with local policies and procedures. Keeping Children Safe in Education must be read by all staff ([Part 1](#)) and governors ([Part 1 and Part 2](#)).

The chapters in the suite are:

Chapter 1: promoting a positive, inclusive and safe learning environment;

Chapter 2: early intervention and prevention;

Chapter 3: low level concerns;

Chapter 4: child protection concerns

Chapter 5: child-on-child abuse;

Chapter 6: children who go missing from education;

Chapter 7: online safety, including social media and sharing nude and semi-nude images and videos (previously known as sexting);

Chapter 8: responding to allegations of abuse against staff.

Other key school documents to refer to are the:

- Staff code of conduct (including procedures for dealing with allegations against members of staff);
- Low level concerns policy;
- Behaviour policy, including anti-bullying policy;
- Recruitment policy (including safer recruitment and DBS checks);
- Information sharing and data protection policy;
- Curriculum intent, implementation and impact, especially for Relationships & Sex Education, Health Education and Citizenship Education;
- Risk assessment framework (particularly during pandemic-related lockdowns).

Roles, responsibilities and training

All staff members have a responsibility to keep children safe and well. Appendix 3 sets out training requirements, key people (including DSL and Deputy DSL), and specific responsibilities for ensuring that an appropriate framework is in place.

Complaints and whistleblowing

Complaints should follow the procedures as set out in the Complaints Policy on our website. Staff also have a responsibility to raise any concerns following the school's whistleblowing policy.

Please see the separate whistleblowing policy

NSPCC Whistleblowing Helpline	https://www.nspcc.org.uk/keeping-children-safe/reporting-abuse/dedicated-helplines/whistleblowing-advice-line/
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Compliance

This suite of policies complies with the legislation and statutory guidance listed at Appendix 1. It also complies with the strategic safeguarding arrangements agreed and published by our three local safeguarding partners (Herefordshire Council, the Hereford Clinical Commissioning Group, and West Mercia Police) as part of Safeguarding Children and Young People in Herefordshire, set out at <https://westmidlands.procedures.org.uk/page/contents> .

CHAPTER 1: PROMOTING A POSITIVE, INCLUSIVE AND SAFE LEARNING ENVIRONMENT

1.1 A positive and inclusive school

We seek to nurture every child to reach their potential by working together in friendship, growing together in honesty and respect, and flourishing together in happiness. This can only be achieved if all children feel welcome, included, safe and respected. All children therefore benefit from positive messages about wellbeing, confidence and resilience, as well as developing an understanding of how to protect themselves through the curriculum, particularly Relationships Education, Health Education and Citizenship Education, and lessons regarding online safety. Our behaviour policy encourages all pupils to treat each other considerately and with respect. Our assemblies foster an understanding of our values and how to live them out, while developing an understanding of the importance of democracy and freedom of speech. Pupils participate in local community events so that they appreciate and value their neighbours and friends, including those who may not share their background.

1.2 Keeping children safe at school

Visitors

Prior to arranging visitors to school, staff should consider the arrangements for, and purpose of, the proposed visit. For visiting speakers, it is important to assess the educational value and age-appropriateness of what is going to be delivered and relevant checks that may be required.

As part of ensuring that the school itself is a safe environment, we ask visitors:

- to report to reception, where we will check their credentials before they come in if they are unknown to us;
- to wear a visitors' badge;
- not to take any photographs on their 'phones or other devices whilst in school;
- to provide a DBS certificate before they are able to work 1:1 with children.

All other visitors will be accompanied and never left unsupervised with children.

Children who go missing whilst at school

If a child goes missing, we will secure the site, check boundaries, contact parents, contact other names on the child's contact list, contact the police, record the incident, report it as a near miss if necessary, and take steps to update risk assessments to ensure such incidents do not occur again.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact parents, contact other names on the child's contact list, and look after the child until collected. If the child is not collected within an hour and we cannot make contact with a parent or other named contact, we will agree an appropriate course of action with the headteacher, and record the incident on the pupil's file.

1.3 Wider societal factors beyond school and college

Staff receive training regarding contextual safeguarding (the areas of safeguarding specific to the location of the school). Around the market towns of Leominster, Ludlow and Tenbury the areas of concern are county lines and substance misuse. There is an attendant risk of Child Criminal and Sexual Exploitation.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually.

CHAPTER 2: EARLY INTERVENTION AND PREVENTION

School staff are well-placed to identify at an early stage if there are problems arising in children's lives. It is always easier to help children and their families if issues are identified early. Some additional support within school or from informal voluntary sector routes might be enough to give people the help that is needed. See below for resources and next steps.

https://www.herefordshire.gov.uk/downloads/download/607/common_assessment_framework_-_resources_for_practitioners_and_professionals

2.1 Active listening and a note on confidentiality

If a child wishes to talk to you, you (which refers throughout this policy to the staff member who is aware of a potential safeguarding issue) should always:

- make time to do so promptly;
- listen without judgement, giving time and not asking leading questions;
- stay calm and not show if you are shocked or upset;
- tell the child s/he has done the right thing in telling you;
- explain what will happen next and that you will keep it confidential, as long as it does not put them or someone they know at risk of being hurt.

You should never promise a child that you will keep information secret, as you cannot do so if information disclosed raises a safeguarding concern. Sharing confidential information (including sensitive and personal data) for the purposes of safeguarding and protecting children is specifically allowed under the Data Protection Act. This can be done without consent if a practitioner is unable to, or cannot be reasonably expected to, gain agreement from the individual, or if gaining agreement could place the child at risk. However, you should only tell those who need to know (the DSL in the first instance). If you are uncertain about whether it is acceptable to share information, you should consult the DSL.

2.2 Early warning signs

You should also be alert to warning signs of problems arising, particularly where they may constitute abuse or neglect. Ultimately, this will be based on your professional judgement, supported by a discussion with the DSL, but you could look out for signs such as a child's:

- routinely arriving late, or regularly missing days of school;
- not being able to focus as well as usual in class;
- having poor self-esteem or low confidence;
- beginning to have behavioural problems;
- behaviour changing in relation to other children (e.g. becoming more withdrawn or more gregarious);
- not feeling like they belong;
- beginning to make less good progress than previously;
- language or references to out-of-school activities changing;
- changing their friendship group;
- making references that concern you in relation to their online activity;
- often being tired or hungry;
- often being poorly dressed;
- parents' ceasing or reducing significantly their contact with school;
- apparently receiving limited support to learn at home;
- signs of self-harm;
- signs of unexplained injuries;
- having unexplained gifts or new possessions;
- having to have more time off for GP appointments.

If you notice physical injuries (including whilst children are changing for PE), you can ask them how the injury happened.

The Prevention of Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Extremism is vocal or active opposition to **fundamental British values**, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people;
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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. 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

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism <https://www.gov.uk/government/publications/prevent-duty-guidance>

2.3 Recognising increased vulnerability

You should also be aware that some groups of children may be more at risk of experiencing problems. These include:

- having special educational needs (SEN), disabilities or additional needs;
- being a young carer;
- being frequently targeted for bullying;
- going missing from care, home or education;
- showing signs of being drawn in to anti-social or criminal behaviour;
- misusing drugs or alcohol;
- having changes in their family circumstances;
- experiencing discrimination due to their race, ethnicity, religion, gender identification or sexuality;
- having English as an additional language;
- living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse, parental mental health problems, or domestic violence;
- being an asylum seeker;
- being at risk either due to their own or their family member's mental health needs;
- being at risk of FGM or forced marriage;

- having a social worker, being looked after or previously looked after (see Appendix 4).

Experiencing some of these factors can increase some (even young) children's vulnerability to sexual exploitation, radicalisation, violent extremism, modern slavery, trafficking or criminal exploitation, and serious youth violence. You should also be alert to the possibility that organised abuse involves one or more abusers and a number of children. This can occur both as part of a network of abuse across a family or community and within institutions such as residential homes or schools. There are also cases in which children are abused online. More information can be found in Annex A of Keeping Children Safe in Education.

Further information and resources about the identification and support of children vulnerable to Child Criminal Exploitation and Child Sexual Exploitation.

<https://www.herefordshiresafeguardingboards.org.uk/safeguarding-information/safeguarding-children-information/child-exploitation>

If you have a mental health concern about a child

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 appropriate to the level of concern.

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

Department for Education guidance on mental health and behaviour in schools for more information:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

2.4 Potential barriers to recognising and disclosing neglect or abuse

You should be aware that for some children, particularly those with SEN and disabilities, additional barriers can exist when recognising and disclosing abuse and neglect, including:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's situation without further exploration;
- pupils who are more prone to peer-group isolation than other pupils;
- the potential for disproportionate impact of behaviours such as bullying, or problems at home, without their outwardly showing any signs;
- communication barriers and difficulties in overcoming these barriers – as a result of a disability or a feeling that such problems should not be discussed, for example.

Extra pastoral support is available for pupils you consider to be at risk of experiencing such barriers in understanding these issues if needed. If you believe this may be helpful, please talk to the DSL.

2.5 Sensitivity to cultural expectations

You (and the DSL) should be aware of the impact of cultural expectations and obligations on the family, the family's knowledge and understanding of UK law in relation to parenting and

child welfare, the impact on the family if recently arrived in the UK, their immigrant status if so, and the potential need to use safe and independent interpreters for discussions about parenting and child welfare, even though the family's day-to-day English may appear/be adequate. However, the analysis of the child's and family's cultural needs must not result in a lowering of expectations when applying standards of good practice to safeguarding the child.

2.6 Children with a social worker

Where the school is aware that a pupil has a social worker, you and the DSL should always consider this fact to ensure that 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.

2.7 The child's wishes

In all efforts to support a child's safety and mental and physical wellbeing, the child's wishes and feelings should be taken into account when determining what action to take and what services to provide. The family's circumstances also need to be taken into account (as has been particularly apparent during periods of lockdown).

CHAPTER 2: LOW LEVEL CONCERNS

School promotes a whole school approach to safeguarding, ensuring an open and transparent culture in which all concerns about all adults working in or on behalf of the school (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

At **School** all concerns about adults (including allegations that do not meet the harms threshold (see KCSIE 2023 Part Four - Section one) are shared responsibly and with the right person, they are recorded and dealt with appropriately. This will encourage an open and transparent culture; enable school to identify concerning, problematic or inappropriate behaviour early; minimise the risk of abuse; and ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the school.

What is a low level concern?

The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the threshold set out in KCSIE and as expanded on in chapter 3 of this document. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

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

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

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

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

KCSIE 2023 highlights that low-level concerns may arise in several ways and from a number of sources. suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that any such concerns, including those which do not meet the harm threshold (see KCSIE 2023 Part Four - Section two), are shared responsibly and with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of the school from potential false allegations or misunderstandings.

Reports of any low level concern from pupils or staff should be made in the first instance to the Headteacher, or in their absence Deputy/Assistant Head. If the issue relates to the Headteacher, the information is to be given to the Chair of Governors via email or by phone with the telephone number held in the school office.

Staff code of conduct and safeguarding policies

This low-level concerns policy sits alongside the Staff Behaviour (Code of Conduct Policy) and the other chapters of this policy suite. It is important to share low-level concerns for the purpose of creating and embedding a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

The governing body ensures the staff code of conduct, behaviour policies and safeguarding policies and procedures are implemented effectively, and ensure appropriate action is taken in a timely manner to safeguard children and facilitate a whole school approach to dealing with any concerns.

School can achieve the purpose of the low-level concerns policy 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 safeguarding concerns;
- 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; and,
- helping identify any weakness in the school's safeguarding system

Sharing low-level concerns

Low-level concerns about a member of staff, supply staff, volunteer or contractor should be reported. Please see Appendix 1 for Reporting Low Level Concerns. Reports about supply staff and contractors should be notified to their employers, so any potential patterns of inappropriate behaviour can be identified. Our school will ensure there is an environment where staff are encouraged and feel confident to self-refer, where, for example, they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

Recording low-level concerns see Appendix 1 Reporting Low Level Concerns

All low-level concerns should be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

The Headteacher will keep these written records. The record will be confidential, held securely and comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (UK GDPR) (see paragraph 109 for more information).

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

The school will retain the information until the individual leaves the school's employment.

References

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

Responding to low-level concerns

On receiving information regarding a low level concern, the person raising the concern will be asked to complete the form in Appendix 1 'Reporting Low Level Concerns.' The Headteacher will discuss the concerns raised with the person completing the report and the actions around the concern. The information collected will help the Headteacher to categorise the type of behaviour and determine what further action may need to be taken. All of this will be recorded along with the rationale for the decisions and action taken.

If the concern has been raised via a third party, the Headteacher will collect as much evidence as possible by speaking:

- directly to the person who raised the concern, unless it has been raised anonymously;
- to the individual involved and any witnesses.

The information collected will help them to categorise the type of behaviour and determine what further action may need to be taken. All of this needs to be recorded along with the rationale for their decisions and action taken.

This low level concerns policy will be a reflection and extension of the school's wider staff behaviour policy/code of conduct.

Appendix 1

Reporting Low Level Concerns

Name of person raising concern: _____ *(or report submitted anonymously)*

Date: _____ **Time:** _____

Present:

—

Meeting **Telephone Call** **Other**

Details of the Concern

Context in which the concern arose

Action Taken
Follow Up Notes

Signed: _____ **Person raising concern (if not anonymous)**

Signed: _____ **Headteacher or Chair of Governors**

CHAPTER 4: RESPONDING TO CHILD PROTECTION CONCERNS

CONTENTS

		Page
1	Purpose	3
2	Context	3
3	Definition of Safeguarding	3
4	Definition of Child Protection	5
5	Staff with additional safeguarding responsibilities	4
6	Local Arrangements and useful contacts	4
7	Linked Policies	6
8	Safeguarding resources available to DHMAT schools	7
9	Right Help	8
10	4 categories of abuse	8
11	Child on Child abuse overview	10
12	Preventing Radicalisation	12
13	Our personal role in the recognition of needs, harm and abuse	12
14	Continuous professional development underpins a healthy safeguarding culture in our school.	13
15	Roles and functions within our school	15
16	The designated safeguarding lead (DSL)	16
17	The LAB/STG	17
18	The Headteacher	17
19	Leadership and management towards an effective culture	18
	Appendix 1. Legislation and statutory guidance	19
	Appendix 2. Equalities and additional risk factors	21
	Appendix 3. Police and Criminal Evidence Act (1984) – Code C	22

1. Purpose

- To reduce risk and prevent harm to children.
- To ensure the identification of, and timely and appropriate responses to, risk and harm to children.
- To ensure that all adults in the school community understand their roles and responsibilities in respect of the above.

2. Context

2.1 Orleton and Kimbolton schools provides a universal service to children in our locality. School staff are closely involved, daily, with children and their families. Consequently, we have a critically important role towards the identification and prevention of harm and abuse.

2.2 This policy does not reiterate extensive sections of statutory guidance. It is a practical document that clarifies the roles and duties of **all adults** working in our schools and school communities. It should be used in conjunction with Keeping Children Safe in Education and with related school policies, as specified in section 7 of this policy.

2.3 We welcome our personal and professional safeguarding responsibilities, and as set out in statutory guidance (Appendix 1), it is our duty to maintain a professional working knowledge of relevant statutory guidance and of local arrangements as determined by Herefordshire Council.

3. Definition of Safeguarding: Safeguarding is the action that is taken to promote the welfare of children and protect them from harm. This applies to **all children** in our care and in our communities.

3.1 **Safeguarding is everyone's responsibility.** Safeguarding means:

- protecting children from abuse and maltreatment;
- preventing harm to children's health or development;
- ensuring children grow up with the provision of safe and effective care;
- taking action to enable all children and young people to have the best outcomes.

4. Definition of Child Protection: '*Child protection*' is the activity to protect specific children who are suffering, or who are likely to suffer, significant harm. Therefore, *protection* is a specific element of safeguarding, whereas safeguarding legislation in general is about the promotion of children's needs and the prevention of harm. This emphasises the need for all staff to be able to respond early when they have a concern rather than wait until this is more defined and certain.

At this point the involvement of services to protect the child (ren), including Children's Social Care, is statutory. The critical message from legislation that should inform all actions and decisions is that "**the child's welfare is paramount**".

5. Staff with additional safeguarding responsibilities

- Headteacher – DSL – Adam Breakwell
- Head of School – DDSL – Charlotte Hyde (Kimbolton) Lucy Rossiter (Orleton)
- Designated Teacher for children who are Looked After (LAC) and Previously Looked After (PLAC) – Adam Breakwell
- Computing Lead- Oliver Hambidge
- Senior Mental Health Lead – Libby Bevan
- Safeguarding Link Governor – Sallie Peacock

6. Local arrangements and useful contacts

6.1 West Midlands Child Protection and Safeguarding Procedures Manual

Twelve local authority areas collaborate with regards to child safeguarding procedures. Each local area's multi-agency safeguarding arrangements are led by the statutory safeguarding partners/organisations: local authorities, clinical commissioning groups and the police.

6.2 How to use the manual

Use this link to the [contents](#) page to access the different sections of the regional procedures: Statutory Child Protection Procedures; Regional Safeguarding Guidance; Local Area Specific Safeguarding Information and Procedures.

With respect to the Local Area Specific Safeguarding Information and Procedures, please choose from the drop-down list to access the localised content for your local partnership.

6.3 Child protection referrals

If you are a professional and want to make a referral to Children's Social Care, use [this link](#) and choose the area you're working in.

For contact details for your Local Safeguarding Children Partnership, use [this link](#) and choose the area you're working in.

6.4 Quick reference contact details for essential local services

6.5 Advice and support for referral and assessment:

- MASH: [01432 260800](tel:01432260800) (8:45am-5:15pm)
- EDT: Out of hours or at weekends: [01905 768020](tel:01905768020)
- Early Help Hub: [01432 260261](tel:01432260261)

6.6. West Mercia Police:

- If a child is in immediate danger, telephone 999 and request the Police
- To contact the police to discuss a child protection or safeguarding concern, when a child is not in immediate danger, telephone 101
- You can also email the police to inform them of concerns and start a conversation with them at contactus@westmercia.pnn.police.uk
-

6.7 The Local Authority Designated Officer (LADO)

If you are concerned that an adult working with children may have harmed a child, please refer to the DHMAT allegations of abuse policy. This provides details about when to contact

the LADO. If in doubt, contact the LADO.

Name: **Terry Pilliner**

Telephone: 01432 261739

6.8 Radicalisation

If you believe someone is in danger of being exploited or becoming radicalised, use your organisation's own safeguarding and duty of care procedures in the first instance to raise your concerns. Channel can then become involved if necessary. Anyone can call the national police Prevent advice line on **0800 011 3764**, in confidence, to share your concerns with specially trained officers. The advice line is open 9am to 5pm every day.

You can also contact the Prevent team by emailing Prevent@westmercia.police.uk Or you can report a concern using the [Prevent referral form](#).

If you are concerned about someone outside [Herefordshire](#), for example, a student who doesn't live in the county, you can still call one of the numbers above for advice.

6.9 Additional support for online abuse

CEOP works to keep children safe from sexual abuse and grooming online. **CEOP are unable to respond to reports about bullying, fake accounts, or account hacking.** You can report to CEOP if you are concerned that a child is being sexually abused or groomed online. This might be from someone they know or someone they have only ever met online. CEOP are here to help and advise you and to make the child safe.

If you have already reported your concern to your local statutory service, including children's social care or the police, you do not need to make a report to CEOP.

If you think a child is in immediate danger, please call the police on 999. For more information relating to keeping children safe online from sexual exploitation and abuse you can visit our [CEOP Education website for professionals](#).

7. Linked policies

This overarching policy is supplemented with the following policies and procedures:

- Quality Assurance cycle
- Staff recruitment and retention (including Safer Recruitment Policy)
- Staff Code of Conduct, including Whistleblowing Policy
- Behaviour policy suite, including anti-bullying policy, attendance policy, behaviour management, and positive physical handling
- Relationships and Sex Education policy (and PSHE Curriculum overview)
- Educational Visits Policy

8. Safeguarding resources available in each school

- All staff, in each school, use MyConcern as the means of reporting and recording concerns about children. (See below under reporting and recording.)
- We subscribe to a range of services from The Key
- Schools use the CPD resources provided by the Key to plan and support professional learning across the school year.
- Governors use resources from the Key to support safeguarding monitoring visits to schools.
- We use published materials to ensure our single central record is complete and compliant
- We use Ben Straker from the DH MAT to provide training for of DSL and DDSL's and to audit our safeguarding annually.
- Schools maintain close links with their local safeguarding partnership and make use of learning events and resources.

9. Right Help: Right time – Local Levels of Need Threshold Guidance

<https://westmidlands.procedures.org.uk/assets/clients/6/Herefordshire%20downloads/HSCB%20Levels%20of%20Need%20Rnl%20May%202021.pdf>

9.1 **All staff** should possess a working knowledge of the local levels of need thresholds guidance. Reference to this guidance will inform the identification of risk and harm.

9.2 Outline Levels of Need categories:

- Universal (Level 1) No additional support beyond that which is universally available.
- Early Help (Level 2) Children and young people where some concerns are emerging and who require additional support, usually from professionals already involved with them (Threshold to Consider Early Help Assessment **EHA**).
- Targeted Early Help (Level 3) Children and young people who are causing significant concern or where concerns recur frequently (Threshold to initiate **EHA**).
- Specialist (Level 4) Children and young people who are very vulnerable. (Threshold to refer to Children’s Social Care).

9.2 **Early Intervention** It is generally expected that referrals to children’s social care would follow significant input at levels 2 and 3.

9.4 The School **Early Help Offer is** published online and sets out the range of services and assistance that school provides for children and families.

10. The 4 categories of abuse

10.1 Child abuse is the maltreatment of a child by another person - by adults or children. Somebody may abuse or neglect a child by inflicting harm or failing to act to prevent harm. Abuse, including neglect, and other safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap. **All referrals to children’s social care will be under one or more of these broad categories of abuse.**

- 10.2 **Physical abuse** 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.
- 10.3 **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.
- 10.4 Emotional abuse 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.
 - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
 - 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.
 - Seeing or hearing the ill-treatment of another.
 - Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.
- 10.5 **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.
 - 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).
 - Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.
- 10.6 **Neglect** is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal

substance abuse. Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, 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 caregivers).
- Ensure access to appropriate medical care or treatment.

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

11. Child on Child abuse overview (see further detail later in this document)

11.1 Allegations of abuse made against other pupils

We recognise that children are capable of abusing other children. 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.

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

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 or semi-nudes).

11.2 Sharing of nudes and semi-nudes ('sexting') Please refer to our online safety policy. Our approach is based on guidance from the UK Council for Child Internet Safety (<https://www.gov.uk/government/organisations/uk-council-for-internet-safety>)

11.3 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 on MyConcern 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.
- Please refer to local interagency arrangements, as set out in our separate child on child abuse policy.

11.4 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 children, 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 that might impact, more typically, on boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse
- Ensure staff reassure victims that they are being taken seriously.

11.5 We 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
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
- That a pupil harming a child 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.

12. Preventing radicalisation

12.1 **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

12.2 **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

12.3 **Terrorism** is an action that: endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system.

The use or threat of terrorism is designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

Schools have a duty to prevent children from being drawn into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

12.4 We will ensure that suitable internet filtering and monitoring is in place and equip our pupils to stay safe online at school and at home. **See separate online safety policy**

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

Staff will be alert to changes in pupils' behaviour. Educate Against Hate provides useful resources to identify indicators of possible radicalisation.

<https://www.educateagainsthate.com>

13. Our personal role in the recognition of needs, harm and abuse

13.1 **Recognise:** It is important that everyone working with children should be able to recognise the signs of possible abuse and neglect. It is not adequate to wait for disclosure as the primary means of detecting child abuse. The recognition and

identification of signs of potential abuse will form part of our continuous professional development.

- 13.2 **Respond:** All adults in school are 'Trusted Adults' and are emotionally available to children - a crucial aspect of our safeguarding culture. We will not ignore harmful behaviours or actions. We are prepared to respond appropriately to concerns and disclosures of abuse from children.
- 13.3 **Record/Report:** It is our duty to record first-hand, in writing, concerns and disclosures about children. This will be done promptly and securely using our safeguarding case management software MyConcern. All staff will be supplied with log-in details for MyConcern and are expected to make appropriate use of the system.
- 13.4 **In cases of serious risk or harm to a child, an immediate verbal alert to the DSL is required.** The DSL responds to and manages all actions, case notes and chronologies via MyConcern.
- 13.5 **Refer:** The DSL will triage all concerns promptly against levels of need thresholds guidance. In normal circumstances, the DSL will decide the most appropriate action. At Levels 3&4 this will normally be in consultation with the 'front door' to children's social care.

Usually, the Designated Safeguarding Lead will determine the level of concern and refer to external agencies. In the absence of the DSL/DDSL, or if there is disagreement about levels of risk or harm, **any staff member can make a referral to Children's Social Care** and should notify the DSL as soon as possible.

- 13.6 **Female Genital Mutilation (FGM):** Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, **places a statutory duty on teachers to report to the police** where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18. **This individual responsibility must not be delegated.**

- 14. Continuous professional development underpins a healthy safeguarding culture in our school.** In the complex and evolving field of safeguarding, effective practice is best ensured through a programme of continuous professional development (CPD).

14.1 **All staff members** will receive input about safeguarding and child protection at induction. This will include:

- Current KCSiE guidance
- School Policies, including pupil behaviour
- The staff code of conduct
- Low Level Concerns policy
- Whistle-blowing procedures
- Online safety.

This is to ensure that staff understand the school's safeguarding systems, their responsibilities, and can identify signs of possible abuse or neglect.

Professional learning will be continually updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff learning and curriculum planning
- Be in line with advice from the Local Safeguarding Children Partnership
- Have regard to the Teachers' Standards to support the expectation that all teachers: Manage behaviour effectively to ensure a good and safe environment; Have a clear understanding of the needs of all pupils.

Staff will receive regular safeguarding and child protection updates (through emails, e-bulletins, and staff meetings) and enhanced by the termly Safeguarding CPD programme. Staff will receive annual safeguarding INSET and updates, each autumn term, prior to the return to school of children.

14.3 **Volunteers** will receive appropriate CPD, if applicable.

14.4 All staff receive appropriate development on the government's anti-radicalisation strategy, **Prevent**, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. Learning needs will be identified in accordance with local risk determined through regular Prevent risk assessments, at least every 3 years, unless more urgent need is apparent.

14.5 **Wider societal factors beyond school**

Staff receive regular input regarding contextual safeguarding (the areas of safeguarding specific to the location of the school). This information is enhanced by data of reported crime in our locality available online from West Mercia Police.

Current local themes include:

- County lines and the fact we live on the boarder of Wales, Shropshire and Worcestershire.
- Young people often travel long distances to socialise and this can mean extended unsupervised journeys by car or public transport.

- Close knit communities and a reluctance to believe or report safeguarding instances could happen here or with respected people in our community.

- 14.6 **The DSL and Deputy DSLs** will undertake appropriate child protection and safeguarding training (as set out in KCSiE 2023) at least every 2 years, this was last completed in July 2023. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.
- 14.7 **All Governors** should regularly update learning about safeguarding, to ensure they have the knowledge and information needed to perform their functions and understand their responsibilities i.e., support and challenge. This happens at least annually.

The link safeguarding governor attends DSL level CPD every 2 years. The chair of governors will be required to act as the 'case manager', in the event that an allegation of abuse is made against the Headteacher. This person should receive training in managing allegations for this purpose.

14.8 **Safe Recruitment – interview panels**

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

- 14.9 **Staff who have pastoral contact with pupils and families** will receive regular supervision which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Roles and functions within our school

- 15.1 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 Herefordshire. Our policy and procedures also apply to extended school and off-site activities.
- 15.2 **All staff** will read and understand part 1 and Annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- 15.3 All staff will sign a declaration (marked as 'read and understood' when administered via MyConcern) at the beginning of each academic year to say that they have reviewed the guidance.

15.4 All staff will be aware of:

- Our systems which support safeguarding, including:
- This child protection and safeguarding policy,
- the staff code of conduct the role and identity of the designated safeguarding lead (DSL) deputies,
- the behaviour and online safety policies,
- the safeguarding response to children who go missing from education.
- The Early Help process and their role in it, including: the identification of emerging problems, liaison with the DSL, and the sharing of information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child on child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE) indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

16. The designated safeguarding lead (DSL) is a member of the senior leadership team. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of hours email contact

abreakwell@orleton.hereford.sch.uk or via phone number supplied to all staff.

When the DSL is absent, the deputies will act as cover including out of hours and out of term activities.

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Report to governors termly and present an annual external review

The DSL will also liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSL and deputies are set out in their job description.

- 17.** The governing body facilitates 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. They will evaluate and approve this policy at each review, ensure it complies with the law and hold the Headteacher to account for its implementation. The governors have appointed Ben Sraker to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of Governors will act as the 'case manager' in the event that an allegation of abuse is made against the Headteacher, where appropriate. All governors will read Keeping Children Safe in Education. Section 19 of this policy has information on how governors are supported to fulfil their role.

- 18. The Headteacher** is responsible for the implementation of this policy, including: Ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents 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 update the content of this 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 3)
- Ensuring the relevant staffing ratios are met, where applicable (nursery)
- Making sure each child in the Early Years Foundation Stage is assigned a key person

19. Leadership and management towards an effective culture

Leaders must create a culture in which all staff, trustees and visitors understand **how to raise concerns** and feel supported to do so.

Governors should ensure that they have a clear understanding of the local risks that are applicable to the demographic of the school.

Governors should ask challenging questions of leaders' assertions and 'triangulate' these assertions more thoroughly so that they understand what behaviour is like.

Appendix 1. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2023, Working Together to Safeguard Children 2023, and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by The Herefordshire Safeguarding Partnership.

This policy is also based on the following legislation:

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counter- Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy
- The "2018 Childcare Disqualification Regulations") and Childcare Act 2006, which set out who is disqualified from working with children.

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

This policy also complies with our funding agreement and articles of association.

Appendix 2. Equalities and additional risk factors

Some children have an increased risk of abuse, and additional barriers can exist for some children with respect to recognising or disclosing it. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face. We will ensure appropriate consideration of children who:

- Have special educational needs (SEN) or disabilities or health conditions
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after
- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

Annex B of KCSiE contains important additional information about specific forms of abuse and safeguarding issues. School and college leaders and those staff who work directly with children should read this annex.

- Should staff have any concerns about a child's welfare, they should act on them immediately. They should follow their own organisation's child protection policy and speak to the designated safeguarding lead (or deputy).
- **Where a child is suffering, or is likely to suffer from harm, it is important that a referral to local authority children's social care (and if appropriate the police) is made immediately.**

This is a valuable supplement to our awareness of risk and harm and is available from the link below for frequent reference.

https://www.keepingchildrensafeineducation.co.uk/annex_b.html

Appendix 3. Police and Criminal Evidence Act (1984) – Code C

1. The Headteacher, Designated Safeguarding Lead (DSL) and deputy (DDSL) are aware of the requirement for children to have an appropriate adult when in contact with Police officers.
2. PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for these purposes.
3. PACE also states that if at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.
4. If a police officer arrives at the academy wishing to speak with a pupil, the receptionist will inform the principal and the DSL and follow the visitor's policy. The DSL will ensure that arrangements are made to inform parents that this is the case and seek their presence at the academy as the appropriate adult. If for any reason the parent cannot attend to be an appropriate adult the DSL or Principal will ensure that an appropriate adult is provided from the academy leadership team.
5. The DSL (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on our online safeguarding system.
6. If having been informed of the vulnerabilities, the DSL (or deputy) does not feel that the officer is acting in accordance with PACE, they will ask to speak with a supervisor or contact 101 to escalate their concerns immediately.
7. A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e., failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.
8. A Police Officer must not caution a child or a vulnerable person unless the appropriate adult is present. If a child or a vulnerable person is cautioned in the absence of the appropriate adult, the caution must be repeated in the appropriate adult's presence.
9. The appropriate adult' means, in the case of a child:
 - the parent, guardian or, if the child is in the care of a local authority or voluntary organisation, a person representing that authority or organisation.
 - a social worker of a local authority or, failing these, some other responsible adult aged 18 or over who is not:
 - a police officer;
 - employed by the police.
 - under the direction or control of the chief officer of a police force; or

- a person who provides services under contractual arrangements (but without being employed by the chief officer of a police force), to assist that force in relation to the discharge of its chief officer's functions.

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

¹ The police caution is: *"You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."*

² A person need not be cautioned if questions are for other necessary purposes, e.g. (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

CHAPTER 5: CHILD-ON-CHILD ABUSE

The Herefordshire Safeguarding Children Partnership Child on Child Abuse guidance will help professionals to understand this problem, their role and what they should do to prevent, identify, and address instances of child on child abuse.

All professionals in Herefordshire should familiarise themselves with the guidance, understand what child on child abuse is, their role and actions they should take.

You can access the child on child abuse guidance on the Herefordshire Partnership page here: Sexually harmful behaviour tools and pathways (<https://www.herefordshiresafeguardingboards.org.uk/new-multi-agency-guidance-published-for-peer-on-peer-abuse>)

5.1 Allegations of abuse made against other pupils

Child-on-child abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. Child-on-child abuse can be through direct or isolated incidents, or as a result of ongoing behaviour over a longer period of time. Some of the most common forms include the following – you should note that some may be gendered but all are serious and none is acceptable, and that just because it is not reported, it does not mean it is not happening:

- bullying (including cyberbullying), including emotional abuse;
- physical abuse such as hitting, kicking, shaking, biting, hair-pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration, and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- up-skirting, which typically involves taking a picture under a person’s clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;
- sharing nude and semi-nude images and videos (previously known as sexting or youth produced sexual imagery);
- initiation/hazing-type violence and rituals.

You should minimise the risk of child-on-child abuse by:

- challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images;
- being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing-type violence with respect to boys;
- ensuring our curriculum helps to educate pupils about appropriate behaviour and consent;
- ensuring pupils know they can talk to staff confidentially by explaining this to children each half term or as often as is needed;
- ensuring staff are trained to understand that a pupil harming another child could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

Most cases of pupils who hurt other pupils will be dealt with under the school’s behaviour policy, but this child protection policy applies to any allegations that raise safeguarding concerns. This includes 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, up-skirting or sexually inappropriate pictures or videos (including sharing nude and semi-nude images or videos – see Appendix 6 for further details).

5.2 Signs of child-on-child abuse

You should be alert to signs of someone being abused by another child, e.g.

- Being frightened of walking to and from school or changing their usual route;
- Feeling ill in the mornings;
- Beginning truanting;
- Beginning to perform poorly in their schoolwork;
- Evidence that clothes or books are being destroyed;
- Becoming withdrawn, starting to stammer, lacking confidence, being distressed and anxious and stopping eating;
- Attempting or threatening self-harm or suicide;
- Reports of their crying themselves to sleep or having nightmares;
- Having their possessions go missing;
- Asking for money or starting to steal (to pay the bully) or continually 'losing' their pocket money;
- Refusing to talk about what's wrong;
- Having unexplained bruises, cuts, or scratches;
- Beginning to bully other children/siblings;
- Becoming aggressive and unreasonable.

Where you have concerns, do not hesitate to speak to the DSL. The DSL will either conduct further assessment prior to deciding the extent and nature of the concerns, or will support you to do so.

5.3 Receiving an allegation of child-on-child abuse

If a pupil approaches you to make an allegation of abuse against another pupil:

- do not promise confidentiality as it is very likely that a concern will have to be shared further (for example, with the DSL or children's social care) to discuss next steps;
- if the child would be comfortable to do so, consider including the DSL in the initial discussion;
- recognise and respect your position of trust and that the child feels comfortable talking to you;
- listen carefully to the child, being non-judgmental and clear about boundaries, not asking leading questions, and only prompting the child where necessary with open questions;
- make sure that the child knows what will happen next, and with whom the information will be shared;
- you must record the allegation straight after the child has spoken to you, only recording facts as the child presented them, and tell the DSL, but do not investigate, ensure that the notes do not reflect personal opinion, and only share the report with those people who are necessary in order to progress it;
- where the report includes an online element, you should be aware of the guidance in Appendix 6, not view or forward illegal images of a child, and inform the DSL if viewing an image was unavoidable.

5.4 Investigating reports of abuse

Once you have informed the DSL, s/he may 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 may also contact the children and adolescent mental health services (CAMHS), if appropriate.

The DSL may deem that further investigation within school is necessary before making a referral. This may include advising the parents/guardians of both the victim and the child who is displaying potentially harmful behaviours, and inviting them to be present when the children are interviewed.

It may also include providing pupils with the opportunity to record or dictate in their own words their version of events.

- Neither child will be interviewed on their own after the preliminary questioning following disclosure but should be accompanied by a parent or guardian.
- A written record will be kept of pertinent information including date, time, those present and signature - a diagram / photo of the room / playground may be useful, as well as a description of who was present etc..
- The child will be given the opportunity to confirm the accuracy of the record and record any disagreement.

The DSL will consider whether there is any need to separate the alleged victim and alleged perpetrator in the classroom and school, and the possible need to send one or both home, whilst not further victimising the victim of the alleged abuse.

The DSL must decide in the circumstances of each case whether or not behaviour directed at another child should be categorised as abusive or not. This judgement will inform a decision on next steps. The following factors will be considered in informing this decision.

- Relative chronological and developmental age of the two children (the greater the difference, the more likely the behaviour should be defined as abusive)
- A differential in power or authority (e.g. related to race or physical or intellectual vulnerability of the victim)
- Actual behaviour (both physical and verbal factors must be considered)
- Whether the behaviour could be described as age appropriate or involved inappropriate sexual knowledge or motivation
- Physical aggression, bullying or bribery
- The victim's experience and perception of the behaviour
- The possibility that the abuser is, or was, also a victim
- Attempts to ensure secrecy
- An assessment of the change in the behaviour over time (whether it has become more severe or more frequent)
- Duration and frequency of behaviour
- Whether this was a single incident or is it an escalating pattern of behaviour, and/or whether this behaviour had been observed previously

5.5 Potential actions

The DSL will decide whether to:

- manage the issue initially within school, providing additional pastoral support as needed;

- initiate an Early Help Assessment;
- refer to the MASH (and potentially also the police);
- refer to CAMHS.

Where an allegation is deemed to be malicious and false, this will be managed through the school's behaviour policy.

5.6 Supporting children involved in actual or alleged child-on-child abuse

All children, whether actual or alleged victims or those potentially displaying harmful behaviours, will receive appropriate support within school. This will include time to talk and explore their feelings and motivations with a trusted adult. Where appropriate, parents/guardians will also be supported.

If appropriate, 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).

Additional resources to inform responses to potentially harmful sexual behaviours:

- <https://www.brook.org.uk/training/wider-professional-training/sexual-behaviours-traffic-light-tool/>
- <https://learning.nspcc.org.uk/research-resources/2019/harmful-sexual-behaviour-framework>

5.7 Consideration of children who are lesbian, gay, bi or trans (LGBT)

We recognise that children who are LGBTQ+ may be targeted. Homophobia, biphobia and transphobia are forms of discrimination and hate towards LGBTQ+ people and those who are perceived to be LGBTQ+. We will challenge these prejudices and we will not tolerate these forms of discrimination.

We embrace our responsibility to make available to LGBTQ+ children a trusted adult in school with whom they can be open.

5.8 Police and Criminal Evidence Act (1984) – Code C

The Designated Safeguarding Lead (and deputy) are aware of the requirement for children to have an appropriate adult when in contact with Police officers who suspect them of an offence.

PACE states that anyone who appears to be under 18, shall, in the absence of clear evidence that they are older, be treated as a child for the purposes

PACE also states that If at any time an officer has any reason to suspect that a person of any age may be vulnerable, then that person is entitled to be accompanied by an appropriate adult at any point.

The Designated Safeguarding (or deputy) will communicate any vulnerabilities known by the school to any police officer who wishes to speak to a pupil about an offence they may suspect. This communication will be recorded on CPOMS.

If having been informed of the vulnerabilities, the designated safeguarding lead (or deputy) does not feel that the officer is acting in accordance with PACE, they should ask to speak with a supervisor or contact 101 to escalate their concerns.

A person whom there are grounds to suspect of an offence must be cautioned¹ before questioned about an offence², or asked further questions if the answers they provide the grounds for suspicion, or when put to them the suspect's answers or silence, (i.e. failure or refusal to answer or answer satisfactorily) may be given in evidence to a court in a prosecution.

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

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

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

Further information can be found in the Statutory guidance - [PACE Code C 2019](#).

¹ The police caution is: "You do not have to say anything. But it may harm your defence if you do not mention when questioned something which you later rely on in Court. Anything you do say may be given in evidence."

² A person need not be cautioned if questions are for other necessary purposes, e.g.: (a) solely to establish their identity or ownership of any vehicle; to obtain information in accordance with any relevant statutory requirement; in furtherance of the proper and effective conduct of a search, e.g. to determine the need to search in the exercise of powers of stop and search or to seek co-operation while carrying out a search; or to seek verification of a written record.

CHAPTER 6: CHILDREN WHO GO MISSING FROM CARE, HOME AND EDUCATION

All staff members are aware that children who go missing from education, particularly repeatedly, can be a vital warning sign of a range of safeguarding concerns. Early intervention is necessary to identify the existence of any underlying safeguarding risk and to help prevent the risks that a child goes missing in future. The following therefore sets out the school's procedures for identifying children who are missing education, and for supporting the local authority to find both those missing from education and those missing from care and home.

6.1 Monitoring attendance

If a child fails to attend on their first day, we will make reasonable enquiries and notify the local authority if necessary.

Once a child has started, we will monitor attendance daily and notify the local authority if a child has not attended without explanation for ten days.

6.2 Making reasonable enquiries

Where a child has not attended without explanation, we will make reasonable enquiries, such as checking with:

- relatives, neighbours, landlords and/or other local people who may know
- agencies known to be involved with the family
- the child's previous school, if the child has recently moved from another school
- the Local Authority, in case it is otherwise able to establish the child's whereabouts.

We will record all checks undertaken and use the results to inform our next steps.

If there is reason to believe a child is in immediate danger or at risk of harm, we will make a referral to children's social care (and the police if appropriate).

If there does not appear to be immediate danger but a referral to the local authority becomes necessary after 10 days, we will complete the [CME safeguarding checklist](#) and complete a [CME referral form](#).

6.3 Notifying the Local Authority of changes

To support local authorities in identifying when children go missing from education, we will:

- notify the Local Authority when it is agreed that a pupil will leave at a non-standard transition point (e.g. prior to the pupil's completing Year 6);
- provide the Local Authority with the name of the pupil, name and address of the parent(s)/carer(s) with whom the child is living, at least one contact number, and the date when the pupil is expected to move, if applicable; the name of the pupil's destination school and their expected start date, and; the grounds under which the pupil is leaving the school;
- notify the Local Authority within 5 days when a pupil's name is added to the admission register at a non-standard transition point (i.e. after the start of Reception), together with all the information we hold on the pupil and their parents'/carer's contact details.

CHAPTER 7: ONLINE SAFETY, INCLUDING SOCIAL MEDIA AND SHARING NUDE AND SEMI-NUDE IMAGES AND VIDEOS (PREVIOUSLY KNOWN AS SEXTING)

Our focus in promoting online safety is on:

- creating a culture that incorporates the principles of online safety across all aspects of school life;
- proactively engaging staff members, pupils and parents/carers in promoting online safety;
- reviewing and maintaining principles of online safety, appropriate behaviour and a positive image of self and others;
- embedding and consistently modelling online safety principles.

The online world develops and changes at speed, so the school's approach is to focus on the essential knowledge and behaviours which underpin safe internet use and acceptable online behaviour. This is taught across the curriculum where appropriate, and in a way which reflects each child's age and level of development. As with all aspects of school life, staff members will be sensitive to the impact of particular vulnerability or special educational needs on teaching about online behaviour and safe internet use.

This approach includes enabling children to make judgments about what they see online so that they do not assume that it is true, valid or acceptable, understand how companies use marketing, and can identify risks. They will also learn how to navigate the internet responsibly and how to recognise the ways in which online anonymity and invisibility can be manipulated or used for harmful behaviours such as using fake profiles, incitement to hate crimes, and online grooming. We will be alert to comments from children that may suggest they are being exposed to online grooming or abuse, and any concerns will be addressed in line with the Child Protection policy.

It is also important that young people are aware of the potential negative impact of social media on their own identity, self-esteem, confidence, body image and well-being, and having a healthy self-image forms part of the school's approach to Personal, Social and Health Education and to Relationships Education. We will model a responsible approach to its social media presence. We will not show images of children without parental consent nor breach the privacy of its staff or pupils. We may share general information via social media but will not use social media to communicate with individual parents/carers.

We take a zero-tolerance approach to bullying of all kinds, including cyber-bullying and online abuse, as set out in the Behaviour Policy.

7.1 Staff

Staff members should be mindful of the potential for viruses and malware when accessing the internet, and should never use school ICT to access any site which is unsafe or unlawful or would breach the Code of Conduct. Staff members should not represent their personal views as the school's, and should always be mindful of safeguarding principles. Staff members should consider the professional implications and the school's reputation when posting pictures on any personal social medium.

Staff members should draw boundaries between their professional and personal lives and should not use social media to communicate about individual children. However, we recognise that many staff members have other links to the school and wider community, including as parents and as friends, and it is likely that there will therefore be connection on social media between staff members and parents. Staff members should be mindful of these wider connections and of their professional responsibilities when posting content on social media platforms.

The headteacher will respond immediately and firmly in the event that any staff member is subject to harassment on social media.

7.2 Parents/carers & visitors

Parents and carers have a duty to use social media responsibly. Posting pictures online of children in school uniform should be avoided, and photos of other children must not be posted online without parental consent. Using social media to harass members of staff or other families, or to damage the school's reputation, is not acceptable.

Parents and carers are encouraged to:

- set parental controls and boundaries around internet use;
- be aware of the minimum age requirements for social media sites (usually 13);
- take an interest in their children's online world, including online friends and favourite websites;
- be open with their children that they can always feel comfortable to discuss their online activity, including where there is cause for concern.

All visitors to the school, including parents/carers, must apply the same rigorous standards to their internet and social media use while in school, regardless of the device or connection used.

7.3 Pupils

When using the internet at home, pupils are expected to apply the same principles of online safety, healthy online behaviour and positive self-image which they have learned at school.

Outside school, we will work with parents where incidents have occurred although we are not directly responsible whether cyber or in-person but will always endeavour to stop this from happening.

7.4 Monitoring & reporting

Any misuse of the internet, including of any social medium, must be reported promptly to the headteacher, whether carried out by pupils, staff members, or parents/carers. Misuse will be subject to sanctions or disciplinary action in a way which is appropriate and proportionate.

All school ICT systems, including internet and email usage, may be monitored, so users' personal privacy cannot be assumed.

To promote safety, the ICT support team will:

- put in place appropriate filtering and monitoring systems, which are updated on a regular basis and keep pupils safe from potentially harmful and inappropriate content and contact online while at school, including terrorist and extremist material;
- ensure that the school's ICT systems are secure and protected against viruses and malware, and that such safety mechanisms are updated regularly;
- conduct a full security check and monitor the school's ICT systems on a monthly basis;
- block access to potentially dangerous sites and, where possible, prevent the downloading of potentially dangerous files;
- ensure that any online safety incidents are logged (see appendix 4) and dealt with appropriately in line with this policy;
- ensure that any incidents of cyber-bullying are dealt with appropriately in line with the school behaviour policy.

7.5 Sharing nude or semi-nude images or videos

The following is based on guidance from the UK Council for Child Internet Safety for all staff and for DSLs and senior leaders.

Staff responsibilities when responding to an incident

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

You must not:

- view, download or share 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 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 imagery in order to safeguard the young person (in most cases, imagery should not be viewed);
- what further information is required to decide on the best response;
- whether the imagery 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 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 parents or carers of the pupils involved (in most cases parents should be involved).

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

- the incident involves an adult;
- there is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs);
- what the DSL knows about the imagery 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 imagery is under 13;
- the DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming).

If none of the above applies, 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.

Further review by the DSL

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

The DSL will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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 parents

The DSL will inform parents 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 MASH : 01432 260800.

Recording incidents

All incidents of sharing nude and semi-nude images and videos 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 incidents of sharing nude and semi-nude images and videos.

Curriculum coverage

Pupils are taught about the issues surrounding sharing nude and semi-nude images and videos as part of our PSHE education and computing programmes. Teaching covers the following in relation to sharing nude and semi-nude images and videos.

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

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 sharing nude and semi-nude images and videos is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

CHAPTER 8 ALLEGATIONS OF ABUSE MADE AGAINST STAFF

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

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

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

8.1 Timescales

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

Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week.

If the nature of an allegation does not require formal disciplinary action, we will put in place appropriate action within 3 working days.

If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days.

8.2 Procedure for dealing with allegations

An allegation that a member of staff has misused their powers should be reported in the first instance to the headteacher, and if the allegation is about the headteacher then to the chair of governors or Local Authority Designated Officer (LADO). An allegation will not result in automatic suspension, and staff members can expect to receive pastoral support from the school. We also have a duty to look after the welfare of a child who makes an allegation, and will therefore deal with any allegation quickly, fairly and consistently, will apply common sense and judgment, and will provide protection both for the child and for the person subject to the allegation.

The following steps will be undertaken by the headteacher (or chair of governors where the headteacher is the subject of the allegation).

1. If there is no immediate risk, discuss the allegation straight away with the LADO and agree a course of action, including agreeing whether further investigation is needed and whether the police or children's services need to be involved. The head teacher should also agree whether either of the following actions are necessary:
 - a. 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;
 - b. Ofsted should be informed 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 must be made as soon as reasonably possible and always within 14 days of the allegation(s) which have been made.

2. If there is immediate risk to children, call the police.
3. If the school has been made aware that the Secretary of State has made an interim prohibition order in respect of an individual, immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

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 approach should be taken both in respect of the individual and those who made the initial allegation. Any allegation found to be malicious will be sanctioned as a serious incident in line with our Behaviour policy suite.

If it is decided that further action needs to be taken the following procedure should be followed, in consultation with the LADO (and police and children's services as appropriate).

1. Carefully consider whether suspension of the individual from contact with children at the school is justified. This should usually only be done when there is unavoidable risk to children or the case is so serious it could result in dismissal. If immediate suspension is considered necessary, agree and record the rationale for this with the LADO. 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. When a suspension is necessary, reiterate the pastoral support and counselling which is available.
2. If suspension is not justified, identify a suitable alternative, for example:
 - a. redeployment within the school so that the individual does not have direct contact with the child or children concerned;
 - b. providing an assistant to be present when the individual has contact with children;
 - c. redeploying the individual to alternative work in the school so that they do not have unsupervised access to children;
 - d. 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 have been consulted;
 - e. temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the federation.
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the LADO (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, only share such information with the individual as has been agreed with those agencies.
4. 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.
5. Inform the parents/carers of the child/ren involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegations made against teachers while investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.

6. Keep the parents/carers of the child/ren involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence).
7. Where the police are involved, wherever possible 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.

8.3 Additional considerations

Supply staff

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

- We will not decide to stop using a supply teacher due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing body will discuss with the agency whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the 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.

Following a criminal investigation or prosecution

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

8.4 Possible outcomes of allegation investigations

- **False:** there is sufficient evidence to disprove the allegation.
- **Unfounded:** there is no evidence or proper basis to support the allegation.
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence).
- **Substantiated:** there is sufficient evidence to prove the allegation.
 - 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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS.

- If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive.
 - If an allegation is shown to be deliberately invented, or malicious, the headteacher, or chair of governors in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

8.5 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.

8.6 References

When providing employer references, we will not refer to any allegation that has been proven to be false, unfounded, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unfounded, unsubstantiated or malicious.

8.7 Confidentiality

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

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

- who needs to know about the allegation and what information can be shared;
- how to manage speculation, leaks and gossip, including how to make parents/carers of a child/ren 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.

8.8 Record-keeping

The case manager will maintain clear records and store them on the individual's confidential personnel file for the duration of the case. Such records will include:

- a clear and comprehensive summary of the allegation;
- details of how the allegation was followed up and resolved;
- notes of any action taken and decisions reached (and justification for these, as stated above).

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

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.

The records of any allegation that is found to be malicious will be deleted from the individual's personnel file.

8.9 Learning lessons

After any case, we will review the lessons learned internally. After any cases where the allegations are *substantiated*, we will review the circumstances of the case with the LADO 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 any 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, considering how future investigations of a similar nature could be carried out without suspending the individual.

9.0 LOW LEVEL CONCERNS about staff

Definition of low-level concerns

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

Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**

Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

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

Being overly friendly with children

Having favourites

Taking photographs of children on their mobile phone

Engaging with a child on a one-to-one basis in a secluded area or behind a closed door Using inappropriate sexualised, intimidating or offensive language

Sharing low-level concerns

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

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

- Helping to identify any weakness in the school's safeguarding system
- Regular safeguarding update sessions for all staff lead by the DSL/ DDSL
- Ensuring the safeguarding team have advisable presence with staff across both sites

Responding to low-level concerns

Please refer to the staff code of conduct and the separate low level concerns policy.

Appendix 1: Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education 2023

It is in line with the following guidance and legislation.

The European Convention on Human Rights (ECHR) (the Convention) compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and colleges are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)
- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination,²⁵ and
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances

Working Together to Safeguard Children (2018), and the Governance Handbook

Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils

The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person conducting an interview to be trained in safer recruitment techniques

Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children

Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

Statutory guidance on the Prevent duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 and Childcare Act 2006, which set out who is disqualified from working with children

This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation Stage.

The Data Protection Act (DPA) 2018 and GDPR, which do not prevent, or limit, the sharing of information for the purposes of keeping children safe.

The Department for Education's advice on online safety and relevant legislation. Further resources for schools and parents include:

[Teaching Online Safety in School](#) (DfE guidance, June 2019)

Internet Matters : [Vulnerable Children in a Digital World](#)

[UK Safer Internet Centre](#)

[Think U Know education programme on online safety](#) from the National Crime Agency

UKCCIS literature review of [Children's online activities, risks & safety](#)

ChildNet : [STAR SEND Toolkit](#)

[The Anti-Bullying Alliance](#)

PSHE Association [guidance on teaching about mental health and wellbeing](#)

[ParentZone](#)

Appendix 2: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

Physical abuse 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 is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Emotional abuse 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

Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

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

Seeing or hearing the ill-treatment of another

Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

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)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:
Provide adequate food, 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)

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

KCSiE 2023 recognises that DA can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

Appendix 3: Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm. Child Protection has to be considered within practitioners' wider safeguarding responsibilities that include a duty to co-operate under the Children Act 2004 and take account of the need for children to 'be healthy' and 'stay safe'.

Abuse is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs which is likely to result in the serious impairment of the child's health or development.

A **Child in Need** is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services or a child who is disabled.

A **Child in need of Protection** is a child who is suffering, or at risk of, significant harm. Significant harm is often a combination of significant events, both acute and long-standing, which interrupt, change or damage the child's physical and psychological development. Some children live in family and social circumstances where their health and development are neglected. For them, it is the corrosiveness of long-term emotional, physical or sexual abuse that causes impairment to the extent of constituting significant harm. In each case, it is necessary to consider any maltreatment alongside the family's strengths and supports.

Sharing nude or semi-nude images and videos (previously known as sexting or youth-produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

Children includes everyone under the age of 18.

Female Genital Mutilation is defined in the Department for Education's Keeping Children Safe in Education as "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs". FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.

Radicalisation is defined as the act or process of making a person more radical or favouring of extreme or fundamental changes in political, economic or social conditions, institutions or habits of the mind.

Extremism is defined as the holding of extreme views, particularly those advocating illegal or violent actions to achieve specific ideological changes, whether political, religious or social.

Appendix 4: Child protection and safeguarding roles, responsibilities, training and support within the school

Role	Responsibilities	Training and support to enable fulfilment of responsibilities
All staff, supply teachers, trainees, volunteers and governors	Identify and report concerns regarding a child's wellbeing	Support from the DSL Staff supervisions to provide support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues. Training at induction and regularly thereafter, including on whistleblowing Training on Prevent (the government's anti-radicalisation strategy) Regular safeguarding and child protection updates (for example, through emails, e-bulletins and staff meetings) as required, but at least annually Recruit supply staff from an agency which provides comprehensive safeguarding training in line with the school's recruitment policies
Designated Safeguarding Lead (DSL)	Overall responsibility for ensuring children are safe and protected Available for staff to consult with during working hours Contactable via email and personal mobile outside working hours Contribute to assessments of children Make direct referrals to relevant agencies, or support others to do so Take part in multi-agency discussions, or support others to do so Liaise with local authority lead case-workers or designated officers for child protection concerns	Undertake child protection and safeguarding training at least every 2 years Update knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments) Undertake Prevent awareness training
Deputy DSL	Cover for DSL when needed	As for DSL
Governing body	Approve policy & reviews Ensure they comply with legislation Hold headteacher to account for implementation of the policy	Receive safeguarding training Appoint a representative with lead responsibility for ensuring safeguarding procedures are in place and operating effectively
Chair of governors	Monitor effectiveness of the policy, in conjunction with Full Governing Body Where appropriate, act as case manager if a complaint is made against the headteacher	Training in managing allegations should a complaint be made against the headteacher

Headteacher	<p>Ensure that staff (including temporary staff) and volunteers are informed in their induction of systems which support safeguarding, and that they undertake appropriate training and update it regularly.</p> <p>Communicate this policy to parents.</p> <p>Ensure that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.</p> <p>Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.</p> <p>Ensure that the relevant staffing ratios are met, where applicable (nursery).</p> <p>Ensure each child in the Early Years Foundation Stage is assigned a key person (nursery setting only).</p>	
Recruitment panels	Ensure recruitment practices are safe, and comply with the procedures set out in the recruitment policy.	At least one person conducting any interview for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and will be in line with local safeguarding procedures.

Appendix 5

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

Our designated teacher, Adam Breakwell (executive head teacher and DSL) 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 his role, the designated teacher will:

Ensure that (as DSL) 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

If the school is informed that a child is involved in a 'private fostering' arrangement, they will notify and report to the Local Authority.

Private fostering

- Private fostering is an arrangement whereby a child under the age of 16 (or 18 if the child has a disability) ([S.66 Children Act 1989](#)) is placed for 28 days or more in the care of someone who is not the child's parent(s) or a 'connected person'.
- A connected person is defined as a 'relative, friend or other person connected with a child' ([Regulation 24\(3\) The Care Planning, Placement and Case Review \(England\) Regulations 2010](#)). The latter is likely to include person(s) who have a pre-existing relationship with the child, for example, a teacher who knows the child in a professional capacity.
- Private foster carers can be from the extended family, e.g. a cousin or a great aunt, **but cannot be a relative** as defined under the [Children Act 1989, section 105](#):
- 'A relative under the Children Act 1989 is defined as a 'grandparent, brother, sister, uncle or aunt (whether full blood or half blood or by marriage or civil partnership) or step-parent'.
- It is imperative that the local authority are notified if a child is living with someone who is not their parent or a 'connected person' for longer than 28 days. The local authority need to be satisfied that the placement is suitable and the child is safe. To be defined as 'private fostering', the child must be living with that person for longer than 28 days and this should be continuous but can include occasional short breaks.

Appendix 6: Safeguarding Information Sheet

CHILD PROTECTION CONTACTS	
Designated Safeguarding Lead (DSL)	Adam Breakwell (Orleton, 01568 780366; Kimbolton 01568 612691)
Deputy Designated Safeguarding Lead (DDSL)	Lucy Rossiter (Orleton) Charlotte Hyde (Kimbolton)
All concerns should be recorded on a Child Protection Log Form	
Prevent Lead	Lucy Rossiter (Orleton), Charlotte Hyde (Kimbolton)
LAC Designated Teacher	Adam Breakwell
SENCO	Lisa Butler (Orleton), Charlotte Hyde (Kimbolton)
Governor for Safeguarding & LAC	Camilla Argyle (Orleton), Gill James (Kimbolton)

HEALTH AND SAFETY CONTACTS	
Educational Visits Coordinator	Lucy Rossiter (Orleton), Sue Moss (Kimbolton)
First Aid at Work	Orleton: E Morgan, H Ansell, G Apperley, E Davies, C Moreland J Bent, S Griffiths, J Harris Kimbolton: S Bayley, S Aindow, C Linton, J Morris, T Hales
Paediatric First Aid	Helen Yellowley, Sue Moss, Sally Walker (Orleton) Vickie Rolfe (Kimbolton)
Health & Safety Governor	David George (Orleton), Gill James (Kimbolton)

USEFUL CONTACTS		
Local Authority Designated Officer (LADO)	Terry Pilliner	01432 261739 terry.pilliner@herefordshire.gov.uk
Multi Agency Safeguarding Hub (MASH)	Anne-Marie Kemp	01432 260800 anne-marie.kemp@herefordshire.gov.uk
Out of hours referrals	before 9am or after 5pm	01905 768020
Herefordshire Safeguarding Children Partnership		01432 260100
LA Exclusion Guidance	Clare Sankey	01432 383134 socialinclusion@herefordshire.gov.uk
Prevent officer	DS 512 Phil Colley	01905 747210 07736 08471
Prevent information	Neville Meredith	01432 383268