

# Highcliffe School Child Protection/Safeguarding Policy (in line with local Safeguarding Partnership and LA guidance)

Adopted by the Governing Body 29 June 2024
In force from 1st September 2024

# Our Nominated Governor for Safeguarding is Sue Evans

# Our Designated Safeguarding Lead is Mrs Sarah Giller

Our Deputy Safeguarding Leads are
Miss Lisa Swan, Mr Mathew Downs, Mr Edward Davies.
Level 3 trained Staff: Mrs Sally Riley, Mrs Theresa
Deeprose, Miss Grant, Miss Kaplinsky, Miss Browning and
Ms Parsons

Our Designated Teacher for LAC is Mrs Sarah Giller

Our Anti-Bullying Champion is Mr Edward Davies

Our E-Safety/Online Safety Champion is Mr Mathew Downs

# **Child Protection/Safeguarding Policy**

The child protection/safeguarding policy for Highcliffe School reflects the Pan-Dorset Safeguarding Children Partnership procedures (on the Dorset Safeguarding Children Board website) and 'Keeping Children Safe in Education' 2024.

This policy consists of three main documents:

- A. The overarching safeguarding policy (statement of principles)
- B. Detailed child protection procedures and
- C. Child protection summary sheet. The latter is provided as a separate document and provided routinely for those adults who will not have the opportunity to read this policy in its entirety but will have unsupervised contact, even as a 'one-off', with pupils on a temporary or intermittent basis such as supply, peripatetic or visiting professionals.

## A. Safeguarding Policy

Highcliffe School recognise(s) that the welfare of the child is paramount: the needs and wishes of each child will be put first. Throughout this document, 'child' refers to a young person under the age of 18.

We take seriously our duty to safeguard and promote the welfare of the children and young people in our care. School staff are particularly important, as they are in a position to identify concerns early, provide help for children, promote children's welfare and prevent concerns from escalating. We recognise that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. Staff should maintain professional curiosity.

Safeguarding children is everyone's responsibility. In paragraph 4 of Keeping Children Safe in Education (2024) safeguarding and promoting the welfare of children is defined as:

- providing help and support to meet the needs of children as soon as problems
   emerge
- protecting children from maltreatment, whether that is within or outside the home, including online
- 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
- promoting the upbringing of children with their birth parents, or otherwise their family network through a kinship care arrangement, whenever possible and where this is in the best interests of the children
- taking action to enable all children to have the best outcomes in line with the outcomes set out in the Children's Social Care National Framework

The Governing Body will act in accordance with Section 175 / Section 157 of the Education Act 2002 and the supporting statutory guidance 'Keeping Children Safe in Education' 2024 to safeguard and promote the welfare of children in this school.

The governing body has strategic leadership responsibility for the school's safeguarding arrangements. The headteacher is responsible for ensuring that staff understand and follow policies and procedures agreed by the governing body. We have a whole school approach to safeguarding, whereby safeguarding and child protection underpin all relevant policy and processes. All systems operate with the best interests of the child at heart.

At Highcliffe School, the Governor's Progress Committee ensure that all policies, procedures and training are in place and effective.

Our governing body will also undertake appropriate training to equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place are effective and support the delivery of a robust whole school approach to safeguarding. This training takes place at induction and is updated regularly.

The school will complete and submit to the Safeguarding Children Partnership an annual audit of its safeguarding and child protection/safeguarding arrangements, including an action plan.

At Highcliffe School we understand the importance of working in a way that adheres to the following legislation:

- The Human Rights Act 1998
- Equality Act 2010
- Public Sector Equality Duty

This means we do not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

All children have the right to be safeguarded from harm or exploitation whatever their

- age
- health or disability
- gender or sexual orientation
- race, religion, belief or first language
- political or immigration status

Governors, staff and regular volunteers in this school understand the importance of taking appropriate action and working in partnership with children, their parents/carers and other agencies to safeguard children and promote their welfare.

The purpose of this policy is to:

- afford protection for all pupils
- enable staff and volunteers to safeguard and promote the welfare of children
- promote a culture which makes this school a safe place to learn and in which children feel safe

This policy applies to the Headteacher, all staff, including supply and peripatetic staff, regular volunteers (i.e. those who come into school once a week or more or 4 times in a 30-day period), governors or anyone working on behalf of the school.

We will endeavour to safeguard children and young people by:

- always acting in their best interests
- valuing them, listening to and respecting them
- involving them in decisions which affect them
- never tolerating bullying, homophobic behaviour, racism, sexism or any other forms of discrimination, including through use of technology
- ensuring the curriculum affords a range of opportunities to learn about keeping themselves safe, particularly when using technology
- exercising our duties under the Counter-Terrorism and Security Act 2015
- by ensuring all staff attend 'Prevent' training in respect of radicalisation and extremist behaviour and by assessing the risk of our pupils being drawn into terrorism
- supporting attendance and taking action if a child is missing school regularly
- appointing a senior member of staff from our leadership team as the Designated Safeguarding Lead (DSL) and ensuring this person has the time, funding, training, resources and support to perform the role effectively
- the school has three Deputy Designated Safeguarding Leads to ensure there is always someone available during school hours for staff to discuss any safeguarding concerns
- appointing a Designated Teacher to promote the educational achievement of children who are Looked-After (in care) and to work closely with the virtual school head to discuss how pupil premium plus additional funding can support the progress of these children
- ensuring that staff working with Looked-After Children have information appropriate
  to their role regarding, for example, the child's care arrangements, legal status and
  contact with birth parents and will also have the responsibility for promoting the
  educational achievement of children who have left care
- making sure all staff and volunteers are aware of and committed to the safeguarding policy and child protection procedures and also understand their individual responsibility to take action
- ensuring that all those named above (i.e. DSLs and Deputy DSLs; Designated Teacher; Headteacher, all staff) have training appropriate to their roles as set out in statutory guidance or recommended by the Safeguarding Children Partnership
- identifying any concerns early and providing appropriate help to prevent them from escalating, including working with parents/carers and other agencies as appropriate, for example through the work of year group Pastoral Leads, Mental Health Support Worker and ELSA
- sharing information about child safeguarding concerns with agencies who need to know, and involving children and their parents/carers appropriately
- acknowledging and actively promoting that multi-agency working is the best way to promote the welfare of children and protect them from harm
- taking the right action, in accordance with Safeguarding Children Partnership interagency safeguarding procedures, if a child discloses or there are indicators of abuse
- keeping clear, accurate and contemporaneous safeguarding and child protection records

- recruiting staff and volunteers (including host families) safely, ensuring all necessary checks are made in accordance with statutory guidance and legal requirements and also making sure that at least one appointment panel member has undertaken safer recruitment training
- providing effective management for staff through induction, support and regular update training appropriate to role
- adopting a code of conduct for all staff and volunteers which includes acceptable use
  of technologies, staff/pupil relationships and communications including the use of
  social media
- ensuring our online safety process includes appropriate filters and monitoring systems
- ensuring staff and volunteers understand about 'whistle blowing' and ensuring staff know how to escalate concerns about pupils or staff if they think the right action has not been taken to safeguard children
- promoting a culture in which staff feel able to report to senior leaders with what they
  consider to be unacceptable behaviour or breaches of the school Code of Conduct by
  their colleagues, having faith that they will be listened to and appropriate action
  taken
- dealing appropriately with any allegations/concerns about the behaviour of staff or volunteers in accordance with the process set out in statutory guidance
- Throughout our broad and balanced curriculum, we will provide activities and opportunities for children to develop the knowledge, values and skills they need to identify risks, including knowing when and how to ask for help for themselves and others to stay safe (this includes online). The Relationships Education, Relationships and Sex Education and Health Education (delivered in regularly timetabled lessons and reinforced throughout the whole curriculum) will cover relevant, topics in an age and stage appropriate way, enabling pupils to learn about their rights and responsibilities to behave and stay safe in a variety of contexts on and offline. This will provide further reinforcement to help children identify risks, know when to seek support and develop the skills to ask for help from trustworthy, reliable sources.
- Further information can be found in the DfE guidance '<u>Teaching online safety in school</u>.' <u>and 'Relationships Education, Relationships and Sex Education and Health Education</u>.' This education is underpinned by the school's behaviour policy and pastoral support system.

This child protection/safeguarding policy forms part of a suite of policies and other documents which relate to the wider safeguarding responsibilities of the school. In particular it should be read in conjunction with the

- staff behaviour policy (code of conduct)
- Low Level Concerns policy
- e-safety policies for pupils and staff, which include use of mobile technology
- safer recruitment policy and procedures
- procedures to handle allegations against members of staff and volunteers, including referring to the Disclosure and Barring Service (when appropriate)
- whistle blowing policy
- procedures to respond appropriately when children are missing education

 anti-bullying procedures and school behaviour policy which include use of mobile technology

These policies and procedures are available on the school's website <a href="https://www.highcliffeschool.com">www.highcliffeschool.com</a>

# **B.** Child Protection Procedures

These procedures should be read in conjunction with 'Keeping Children Safe in Education, Part One: Information for all School and College Staff' 2024, plus Annex A.

#### 1. What is Child Protection?

1.1 Child protection is one very important aspect of safeguarding. It refers to the activity which is undertaken to protect specific children who are suffering, or are likely to suffer, significant harm.

#### 2. What is significant harm?

2.1 The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention by statutory agencies in family life in the best interests of children. There are no absolute criteria on which to rely when judging what constitutes significant harm. Sometimes it might be a single traumatic event but more often it is a compilation of significant events which damage the child's physical and psychological development. Decisions about significant harm are complex and, in each case,, require discussion with the MASH.

# 3. Purpose of these procedures

3.1 These procedures explain what action should be taken if there are concerns that a child is or might be suffering harm. A 'child' is a person under 18 years, but the principles of these procedures apply to all pupils at this school, including those over 18.

#### 4. Responsibilities and roles

- 4.1 All adults in the school have an individual responsibility to safeguard and promote the welfare of children by taking appropriate action. This includes taking action where there are child protection concerns.
- 4.2 Governing bodies are accountable for ensuring their school has an effective child protection/safeguarding policy which should be reviewed annually and available publicly, such as on the school website.
- 4.3 The statutory safeguarding guidance for schools: 'Keeping Children Safe in Education' states that all schools and colleges should have 'a senior board level (or equivalent) lead to take leadership responsibility' for safeguarding.

The person who takes leadership responsibility for safeguarding on the governing / proprietor body of this school is: *Sue Evans*.

4.4 This school has a Designated Safeguarding Lead (DSL). This is the person who takes lead responsibility for safeguarding. Any concerns about children should be discussed with / reported to the DSL who will decide what action to take including referring to MASH as

appropriate. More information about the DSL role can be found in Annex C of Keeping Children Safe in Education 2024.

The Designated Safeguarding Lead in this school is: Mrs Sarah Giller

The school also has three Deputy Safeguarding Leads: Miss Lisa Swan, Mr Mat Downs, Mr Edward Davies. Mrs Sally Riley, Mrs Theresa Deeprose, Miss Grant, Miss Kaplinsky, Miss Browning and Ms Parsons are also Level 3 trained.

- 4.5 In addition, the MASH team can provide advice and guidance on safeguarding and child protection matters.
- 4.6 All action is taken in line with the following guidance:
  - DfE guidance (2024) Keeping Children Safe in Education
  - Working Together to Safeguard Children (2023) published by HM Government
  - Pan-Dorset Safeguarding Children Partnership procedures, accessed through bournemouth-poole-lscb.org.uk/
  - What to do if you're worried a child is being abused Government Guidance (2015)
  - DFE Guidance (2021) Sexual violence and sexual harassment between children in schools and colleges.
- 4.7 The school has a designated teacher; Mrs Sarah Giller (Assistant Headteacher) for Looked After Children (LAC)
- 4.8 The designated teacher, on commencement of sections 4 to 6 of the Children and Social Work Act 2017, has the responsibility promote the educational achievement of children who are looked after and previously looked after children, those children who have left care though adoption, special guardianship, kinship care or child arrangement orders, or who were adopted form the state care outside England and Wales.
- 4.9 A previously looked after child potentially remains vulnerable and all staff should have skills knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children it is important that all agencies work together, and prompt action is taken on concerns to safeguard these children, who are a particularly vulnerable group.
- 4.10 The Designated teacher must have appropriate training and the relevant qualifications and experience.

#### 5. What is child abuse?

5.1 It is generally accepted that there are four main forms of abuse. The following definitions are from Keeping Children Safe in Education 2024.

#### i) Physical abuse

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

#### ii) Emotional abuse

The persistent emotional maltreatment of a child such as to cause severe and persistent adverse effects on the child's emotional development. It may involve conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond the child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, though it may occur alone.

#### iii) 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 the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse. Sexual abuse can take place online, and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

#### iv) **Neglect**

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

5.2 It is accepted that in all forms of abuse there are elements of emotional abuse, and that some children are subjected to more than one form of abuse at any one time. In most cases multiple issues will overlap with one another.

# 6. Recognising child abuse – signs and symptoms

6.1 Keeping Children Safe in Education 2024 is clear: 'All school and college staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may need help or protection'.

All school and college staff should be particularly alert to the potential need for early help for children who:

- Are disabled or have certain health conditions with specific additional needs
- Have special educational needs (with or without a statutory Education, Health, and Care plan)
- Have a mental health need
- Are young carers
- Are showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime or county lines
- Frequently go missing from education, home, or care
- Have experienced multiple suspensions or are at risk of permanent exclusion
- Are at risk of modern slavery, trafficking, or sexual/criminal exploitation
- Are at risk of being radicalised or exploited
- Have a parent or carer in custody or are affected by parental offending
- Are in challenging family circumstances, such as those involving drug and alcohol misuse, adult mental health issues, or domestic abuse
- Are misusing alcohol and other drugs
- Are at risk of so-called 'honour'-based abuse, such as Female Genital Mutilation or Forced Marriage
- Are privately fostered.
- 6.2 Recognising child abuse is not always easy, and it is <u>not</u> the responsibility of school staff to decide whether child abuse has taken place or if a child is at significant risk. They do, however, have a clear individual responsibility to act if they have a concern about a child's welfare or safety or if a child talks about (discloses) abuse. They should maintain an attitude of 'it could happen here' and always act in the best interests of the child.
- 6.3 Knowing what to look for is vital to the early identification of abuse, neglect and exploitation. If staff are unsure, they should always speak to the designated safeguarding lead (or deputy) Any concerns about a child's welfare, should be acted upon immediately and recorded on the school's online software "My Concern".

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

6.5 All staff should be aware of the process for making referrals to the MASH team and for statutory assessments under the Children Act 1989, especially section 17 (children in need) and section 47 (a child suffering or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.

Appendix 2 details examples of possible indicators of each of the four kinds of abuse.

# 7. Child on Child abuse, sexual violence and sexual harassment

7.1 All staff should recognise that children can abuse their peers. All staff should be clear about, and follow, school policy. Even if there are no reported cases of child-on-child abuse, the government guidance on 'Sexual Violence and Sexual Harassment Between Children in Schools states that we should believe that it is happening in our school. To encourage students to report cases of child-on-child abuse, there are several means of seeking help: through tutor or a trusted teacher, through the pastoral office or by using the 'pastoral support button' accessible through My Highcliffe or the school website. Staff should be alert to changes in behaviour which may indicate a student is experiencing child on child abuse.

7.2 Sexual violence and harassment can occur between two children of any age or sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Abuse may also happen between students in an intimate personal relationship. Sexual violence or sexual harassment can happen inside and outside the school setting. It can happen in person or online.

7.3 The school's initial response to a report from a child is important. All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. There should be a zero-tolerance approach to abuse. It should never be passed off as 'banter' or 'just having a laugh' or 'boys being boys'. These comments can lead to a culture of unacceptable behaviour and an unsafe environment for children. Whilst girls are most often victims and boys most often perpetrators, we recognise that both boys and girls can experience abuse. If a member of staff witnesses abuse or harassment this will be recorded both on the school's behaviour log and also in My Concern.

7.4 Ultimately, any decisions are for the school to make on a case-by-case basis. The DSL or deputy will take a lead role alongside the Assistant Headteacher for Behaviour Attitudes and Community, using their professional judgement, following the School's Behaviour and Anti Bullying Policies, supported by other agencies, such as MASH and the police as required.

7.5 Reports of sexual violence and sexual harassment are likely to be complex and require difficult decisions to be made, often quickly and under pressure. Pre-planning and effective policies will provide schools with the foundation for a calm, considered and appropriate response to any reports. Both the victim/s and alleged perpetrator will be offered support

through their pastoral lead and also the Mental Health Support Worker. External support may also be signposted (e.g., STARs)

7.6 Following a report of sexual violence, the DSL (or deputy) should make an immediate risk and needs assessment, considering;

- The victim
- The alleged perpetrator
- All the other children (if appropriate adult students and staff)

7.7 The DSL will consider the following options for managing a report of sexual violence or sexual harassment;

- Manage internally
- Early Help
- Referral to MASH

7.8 If children require safeguarding and a referral to the MASH team is made the process for managing sexually harmful behaviour can be found in the inter-agency safeguarding procedures on the LSCB website. In brief, a multi-agency meeting should be convened by the MASH team following a referral and an action plan agreed.

7.9 A school risk assessment will be put in place by way of a meeting, which includes parents/carers and other professionals where they are involved, which will consider;

- The wishes of the victim in terms of how they want to proceed
- The nature of the alleged incident
- The ages of the children involved
- The developmental stages of the children involved
- Any power imbalance between the children
- Is the incident a one off or a sustained pattern of abuse?
- Contextual safeguarding

7.10 All staff should be aware of that safeguarding issues can manifest themselves via child-on-child abuse. This is most likely to include, but may not be limited to;

- Bullying (including cyber bullying)
- 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
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually or to engage in sexual activity with a third party
- Upskirting, 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
- Sexting (also known as youth produced sexual imagery)
- Initiation/hazing type violent rituals

**All** staff should be clear on the school's policy and procedures with regards to child-on-child abuse.

- 7.11 Staff should not dismiss abusive behaviour as 'normal' between young people and should not develop high thresholds before acting.
- 7.12 there may be delays to a criminal process, but the school should not wait for the outcome before protecting the victim, alleged perpetrator and other children in the school.
- 7.13 The School will manage the balance between supporting the victim and ensuring the alleged perpetrator has an education and safeguarding support themselves. Appropriate support should be on an ongoing basis to the victim.

7.14 Youth produced sexual imagery (sexting) involves images or videos which are indecent or of a sexual nature, generated by children under the age of 18 or of children under the age of 18, shared via a mobile phone, handheld device or website. This may be consensual or non-consensual- in both cases this is illegal. Any incidents of sexting that are brought to the school's attention are handled in line with the August 2016 guidance from UKCCIS: 'Sexting in schools and colleges: responding to incidents and safeguarding young people'. The incident will be referred to the DSL as soon as possible, who will hold an initial meeting with appropriate school staff. If appropriate, there will be subsequent interviews with the young people involved. Parents will be informed and involved at an early stage unless there is good reason to believe that involving the parents would put the young person at risk of harm. If there is a concern that a young person has been harmed is at risk of harm, appropriate referrals will be made to MASH and in some instances the school would contact the SSCT for advice only. When dealing with youth produced sexual imagery, the DSL and AHT for Behaviour Attitudes and Community will follow the Behaviour Policy.

The schoolworks to minimise the risk of child-on-child abuse through PSHE sessions, assemblies and visits from outside speakers, including the annual Internet Safety Day. Opportunities are explored to raise parental awareness through email communication and information evenings.

- 7.15 All incidents of child-on-child abuse are logged on My Concern and the data is reported to Governors at each Full Governor Body meeting.
- 7.16 Where a report is found to be false or malicious, consideration should be made as to whether the person making the allegation did so as a cry for help or whether disciplinary action (in the case of a malicious allegation and in line with the behaviour policy) is indicated. In these cases, support should be considered for the alleged perpetrator.

#### 8. Pupils engaging in under-age sexual activity

8.1 Sexual activity where one of the partners is under the age of 16 is illegal, although prosecution of young people who are *consenting partners of a similar age* is not usual. Designated Safeguarding Leads will exercise professional judgement when deciding whether to refer or take advice from social workers, considering such things as any imbalance of power, wide difference in ages or developmental stages etc.

- 8.2 Where a child is under the age of 13 penetrative sex is classified as rape under the Sexual Offences Act 2003 so must be reported to social workers in every case.
- 8.3 The inter-agency safeguarding procedures, on the LSCB website, have more information about under-age sexual activity.

## 9. Serious violence/Child sexual exploitation/Criminal exploitation

9.1 This form of abuse is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child or young person under the age of 18 into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. Child criminal exploitation does not always involve physical contact; it can also occur through the use of technology (Working Together to Safeguard Children 2023).

Signs and symptoms of child sexual exploitation/criminal exploitation can be found in Appendix B

- 9.2 Recognition of child sexual exploitation is part of staff training. We note that any child or young person may be at risk of this form of abuse, regardless of family background or other circumstances, and can experience significant harm to physical and mental health.
- 9.3 Due to the grooming methods used by abusers, it is common for young people not to recognise they are being abused and may feel they are 'in a relationship' and acting voluntarily. To raise awareness of this, all students in Year 8 attend a performance of 'Chelsea's Story' and discuss issues raised.
- 9.4 "County Lines" is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs into one or more importing areas within the UK, using dedicated mobile phone lines or other form of 'deal line'. They are likely to exploit children and vulnerable adults to move and store the drugs and money, and they will often use coercion, intimidation, violence (including sexual violence) and weapons (Working Together to Safeguard Children 2023).
- 9.5 All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include unexplained or persistent absences from education, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.
- 9.6 Any concerns about child sexual exploitation/criminal exploitation will be discussed with the Designated Safeguarding Lead who will take appropriate action including completing a risk assessment form and/or MASH referral.

#### 10. Domestic Abuse

- 10.1 The definition of Domestic Abuse is any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. (Domestic Abuse Act 2021)The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional.
- 10.2 Children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.
- 10.3 Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adults, DSL and Deputy DSL, in school before the child or children arrive at school the following day. The DSL and Deputy DSLs are trained to receive information from Operation Encompass. If school are notified about a domestic incident via Operation Encompass the DSL will notify the pastoral lead who will ensure staff who teach the child are aware that there has been an Operation Encompass Alert. The child will be offered support as appropriate, and parent will be directed to sources of information and support on the school website.

#### 11. Online Safety

- 11.1 At Highcliffe School all staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. We understand that in many cases abuse will take place concurrently via online channels and in daily life. We know that children can also abuse other children online, this can take the form of abusive, harassing, and misogynistic messages, the nonconsensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography.
- 11.2 As part of the requirement for staff to undergo regular updated safeguarding training, online safety training is also delivered, We will ensure online safety is a running and interrelated theme throughout the curriculum and is reflected in relevant policies, teacher training, the role and responsibilities of the designated safeguarding lead and any parental engagement.
- 11.3 The school uses a filtering service provided by 'Smoothwall'. This endeavours to ensure that any attempt to access illegal or inappropriate content through the school's network is blocked and a daily report is sent to, and monitored by, the DSL. The DSL also receives and monitors instant alerts for blocked content related to suicide, abuse and radicalisation and will act to safeguard the student as necessary. In addition to the DSL monitoring daily notification and instant alerts, staff teaching in IT rooms also monitor students' online access in lessons.

Smoothwall receives daily updates to its 'block' list and uses active scanning techniques to consider the content on a page before delivering to the user.

Highcliffe School recognises the challenges of monitoring online access by smartphones and smartwatches due students having unfiltered and often unrestricted access to 4G and 5G. Highcliffe School is therefore a phone free school.

- 11.4 More details can be found in our policies on Behaviour, Online and IT Safety Policy, ICT Acceptable Use Policy, Mobile Phone Policy and Guidance, use agreement which consider the 4Cs, content, contact, conduct and commerce.
- 11.5 At Highcliffe School we recognise that technology, and risks and harms related to the internet evolve and change rapidly. Therefore, we carry out an annual review of our approach to online safety, supported by a risk assessment (on at least an annual basis) that considers and reflects the risks that children face in our setting. We also communication with parents and carers to reinforce the importance of children being safe online.

# Cybercrime

- 11.6 We understand that cybercrime is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer).
- 11.7 If there are concerns about a child in this area, the designated safeguarding lead will consider a referral to the Safer Schools team.

#### 12. Forms of abuse linked to culture, faith or belief

All staff in this school will promote mutual respect and tolerance of those with different faiths and beliefs. Some forms of abuse are linked to these and staff should strive to suspend professional disbelief (i.e. that they 'could not happen here') and to report promptly any concerns to the Designated Safeguarding Lead who will seek further advice from MASH, prior to contacting parents/carers.

- 12.1 **Female Genital Mutilation** is illegal and involves intentionally altering or injuring female genital organs for non-medical reasons. It can have serious and long-lasting implications for physical health and emotional well-being. Possible indicators include taking a girl out of school / country for a prolonged period or talk of a 'special procedure' or celebration. In addition to reporting any concerns to the Designated Safeguarding Lead, teachers have a statutory duty to report personally to the Police if they discover that female genital mutilation has or appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. The DSL will refer concerns to the MASH.
- 12.2 **Forced Marriage** is also illegal and occurs where one or both people do not or, in cases of people with learning disabilities, cannot consent to the marriage and pressure or abuse is used. It is not the same as arranged marriage. Young people at risk of forced marriage might have their freedom unreasonably restricted or being 'monitored' by siblings. There might be a request for extended absence from school or might not return from a holiday abroad. Since February 2023 it has also been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages We recognise that school staff can play an important role in safeguarding children from forced marriage. The DSL will refer concerns to the MASH.

12.3 **So called 'honour-based' abuse** (HBA) is a crime or incident which has or may have been committed to protect or defend the honour of the family and/or community including Female Genital Mutilation (FGM), forced marriage and practices such as breast ironing. It can exist in all communities and cultures and occurs when perpetrators perceive that a relative has shamed the family and/or community by breaking their honour code. Females are predominantly, but not exclusively, the victims and the abuse is often committed with some degree of approval and/or collusion from family or community members. All forms of so called honour- based abuse are abuse, regardless of the motivation, and should be referred accordingly. However, there are some significant differences in the immediate response required as involving families in cases of forced marriage is dangerous:

- It may increase the risk of serious harm to the victim. Experience shows that the family may punish them for seeking help.
- Relatives, friends, community leaders and neighbours should not be used as interpreters – despite any reassurances from this known person.

The DSL will refer concerns to the MASH.

#### 12.4 Prevent, radicalisation and extremism

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

Extremism is defined by HM Government as

the promotion or advancement of an ideology based on violence, hatred or intolerance, that aims to:

- 1. negate or destroy the fundamental rights and freedoms of others; or
- 2. undermine, overturn or replace the UK's system of liberal parliamentary democracy and democratic rights; or
- 3. intentionally create a permissive environment for others to achieve the results in (1) or (2).

In this school we recognise that safeguarding against radicalisation and extremism is no different from safeguarding against any other vulnerability.

Our curriculum promotes respect, tolerance and diversity. Children are encouraged to share their views and to understand that they are entitled to have their own different beliefs which should not be used to influence others.

We recognise that children with low aspirations are more vulnerable to radicalisation and therefore we strive to equip our pupils with confidence, self-belief, respect and tolerance as well as setting high standards and expectations for themselves.

Children are taught about how to stay safe when using the Internet and are encouraged to recognise that people are not always who they say they are online. They are taught to seek adult help if they are upset or concerned about anything they read or see on the Internet. We are committed to ensuring that our pupils are offered a broad and balanced curriculum that aims to prepare them for life in modern Britain. Teaching the school's core values alongside the fundamental British Values supports quality teaching and learning, whilst making a positive contribution to the development of a fair, just and civil society.

Staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

Any concerns about pupils becoming radicalised or being drawn into extremism will be reported to the Designated Safeguarding Lead who will *not* speak to parents/carers or other family members at this stage but will take prompt advice from the Police, email MASH@bcpcouncil.gov.uk

# Mrs Theresa Deeprose is the Prevent Lead

#### 12.5 Prevent

Prevent is about safeguarding people and communities from the threat of terrorism and violent extremism. Prevent is part of CONTEST, the Government's counter-terrorism strategy. It aims to stop people becoming terrorists or supporting terrorism.

The Prevent strategy: Responds to the ideological challenge we face from terrorism and aspects of extremism, and the threat we face from those who promote these views;

- Provides practical help to prevent people from being drawn into terrorism. It ensures they are given appropriate advice and support
- Works with a wide range of sectors (including education, criminal justice, faith, charities, online and health) where there are risks of radicalisation that we need to deal with.
- Prevent covers all forms of terrorism and extremism and some aspects of nonviolent extremism.

The Home Office works with local authorities, a wide range of government departments, and community organisations to deliver the Prevent strategy. The police play a significant role in Prevent, in much the same way as they do when taking a preventative approach to other crimes.

- The main aim of Prevent is to stop people from becoming terrorists or supporting violent extremism.
- At the heart of Prevent is safeguarding children and adults. Providing early intervention to protect and divert people away from being drawn into terrorist activity is crucial.
- Prevent addresses all forms of extremism but continues to ensure resources and effort are allocated on the basis of threats to our national security.

Any individuals who are identified as being susceptible to radicalisation may be referred (with their consent) to a multi-agency Channel Panel. This ensures the appropriate interventions are put in place to protect the individual. Like child protection, Channel is a multi-agency safeguarding programme run in every local authority in England and Wales. It works to support vulnerable people from being drawn into terrorism. It provides a range of support such as mentoring, counselling, assistance with employment etc. Where pupils at this school are being discussed, the DSL or Headteacher will attend the Panel meetings.

Channel is about early intervention to protect vulnerable people from being drawn into committing terrorist-related activity and addresses all types of extremism.

Staff and governors in this school have completed on-line Prevent training. The school has a 'Lock Down' policy in place.

Concerns would be referred to the MASH and the SSCT may be involved to provide early intervention.

# 13. Children missing education

# **Emergency contacts**

Where reasonably possible the school should hold more than one emergency contact number for each pupil. This goes beyond the legal minimum and is good practice to give the school additional options to contact a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern. Parents should remember to update the school as soon as possible if the numbers change.

- 13.1 We recognise that a child being absent from education or missing prolonged periods of education is a potential indicator of abuse and neglect, including the specific types of abuse detailed above including child criminal exploitation /or travelling to conflict zones. Prolonged absence also has an impact on mental health. Repeated or prolonged periods of absence may lead to the child being missing from education in future. We follow the guidance in 'Working Together to Improve School Attendance' DFE 2023 and will refer to children's services if a child's absence indicates a safeguarding concern.
- 13.2 Therefore all staff will follow the school's procedure for dealing with unauthorised absence and children missing from education procedures, particularly on repeat occasions, to help identify vulnerable pupils and to help prevent the risks of their going missing in future.
- 13.3 In response to the guidance in Keeping Children Safe in Education (2024) the school has:
  - 1. Staff who understand what to do when children do not attend regularly
  - 2. Appropriate policies, procedures and responses for pupils who go missing from education (especially on repeat occasions).
  - 3. Staff who know the signs and triggers for travelling to conflict zones, FGM and forced marriage.
  - 4. Procedures to inform the local authority when we plan to take pupils off-roll when they:
    - a. leave school to be home educated
    - b. move away from the school's location
    - c. remain medically unfit beyond compulsory school age
    - d. are in custody for four months or more (and will not return to school afterwards); or
    - e. are permanently excluded

We will ensure that pupils who are expected to attend the school but fail to take up the place will be referred to the local authority.

When a pupil leaves the school, we will record the name of the pupil's new school and their expected start date.

#### 13.4 Elective Home Education

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we recommend that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible. Ideally, this would be before a final decision has been made, to ensure the parents/carers have considered what is in the best interests of each child. This is particularly important where a child has SEND, is vulnerable, and/or has a social worker.

13.5 Actions could include involving other professionals and, if any of the criteria are met, informing the local authority where a pupil's name has been removed from the school roll. The school's procedures for unauthorised absence and children missing education are detailed in the School Attendance policy. Procedures regarding children missing education have been updated in line with the DfE statutory guidance (September 2016).

# 14. Mental Health and Safeguarding.

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

School staff are not expected or trained to diagnose mental health conditions or issues but may notice behaviours that may be of concern.

Where staff have a mental health concern about a child that may also be a safeguarding concern, they should raise the issue by informing the designated safeguarding lead or a deputy or by logging their concern on "My Concerns".

#### 15. Children with Social Workers

We recognise that when a child has a social worker, it is an indicator that the child is more at risk than most pupils.

This may mean that they are more vulnerable to further harm, as well as facing educational barriers to attendance, learning, behaviour and poor mental health.

We take these needs into account when making plans to support pupils who have a social worker. These pupils have access to Pastoral Leads, the Mental Health Support Worker or Learning Support Mentors who can support their emotional wellbeing. Students with social workers are flagged on class lists so that staff are better able to monitor their academic progress and well-being.

# 15.1 Students In Alternative Provision

When Highcliffe school assigns a pupil to an alternative provision provider, we retain responsibility for safeguarding the pupil. Through reviews we will ensure that the provider is suitable to the pupil's needs and will conduct 6 weekly review visits where a pupil is with a registered provider and will make fortnightly contact where a student does not attend school and is with a non-registered provider.

#### 16.1 Private Fostering and Kinship Care

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more.

Kinship care is where a child is looked after by a close family member that is not their parent.

A close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.

Parents and private foster carers both have a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start; not to do so is a criminal offence.

Whilst most privately fostered children and children in kinship care are appropriately supported and looked after, they are a potentially vulnerable group who should be monitored by the local authority, particularly when the child has come from another country. In some cases, privately fostered children are affected by abuse and neglect, or be involved in trafficking, child sexual exploitation or modern-day slavery.

Schools have a mandatory duty to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement. Although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear to the school who has parental responsibility.

School staff should notify the designated safeguarding lead when they become aware of private fostering arrangements. The designated safeguarding lead will speak to the family of the child involved to check that they are aware of their duty to inform the LA. The school itself has a duty to inform the local authority of the private fostering arrangements.

On admission to the school, we will take steps to verify the relationship of the adults to the child who is being registered.

There is more information about specific safeguarding issues including links to websites in Part one and Annex A of 'Keeping Children Safe in Education' 2024.

# 17. Responding to the child who discloses (talks about) abuse

All staff and volunteers will:

- Listen carefully to what is said
- Avoid showing shock or disbelief
- Observe the child's demeanour
- Find an appropriate opportunity to explain that the information will need to be shared on a need to know basis. They will not promise to keep the information confidential or a 'secret'
- Allow the child to continue at her/his own pace and not interrupt if the child is freely recalling events. They will not stop him/her in order to find a 'witness' as this could inhibit the child from saying more
- Avoid asking questions or pressing for more information. Ask for clarification only.
   If questions are necessary they should be framed an open manner and not 'lead' the child in any way: Tell me.... Explain.... Describe...
- Reassure the child, if necessary, that s/he has done the right thing by talking about
   it
- Explain what will happen next and with whom the information will be shared

 Not ask the child to repeat the disclosure to anyone else in school – including the DSL. A child may be asked to write an account after discussion with the MASH, police or LADO but otherwise, do not ask a child to write a statement.

#### 18. Taking action

- 18.1 If in exceptional circumstances, the designated safeguarding lead (or deputy) is not available, this should not delay appropriate action being taken.
- 18.2 Where physical injuries have been observed, these will be carefully noted but not photographed. The staff member will not ask to see injuries that are said to be on an intimate part of the child's body.
- 18.3 Any disclosure or indicators of abuse will be reported verbally to the DSL or Deputy straightaway or, where they are not available, and concerns are immediate, ensure a referral is made without delay to the MASH team.
- 18.4 Where the child already has an allocated social worker, that person or a manager or duty worker in the same team must be contacted promptly.
- 18.5 A written record will then be made (ideally on 'My Concern') of what was said, including the child's own words, as soon as possible.
- 18.6 If the child can understand the significance and consequences of making a referral to social workers, they will be asked for their views. It will be explained that whilst their views will be considered, the school has a responsibility to take whatever action is required to ensure the child's safety and that of other children.
- 18.7 The DSL will decide whether to contact parents at this stage, judging whether to do so, it is necessary to consider if contacting the parents/carers is likely to place the child at risk of harm from their parent's/carers actions or reactions for example in circumstances where there are concerns that a serious crime such as sexual abuse, domestic violence or induced illness has taken place. If in any doubt, the DSL or staff member will call the MASH team in the first instance and agree when parents/carers should be contacted and by whom. The reason for the decision not to contact parents first will be recorded in the child's school child protection/safeguarding file.
- 18.8 A child protection referral from a professional cannot be treated as anonymous.
- 18.9 Where there is no disclosure by a child, but concerns are accumulating, such as in relation to neglect or emotional abuse, the DSL will ensure that all information is brought together and that s/he makes a professional judgement about whether to refer to outside agencies.
- 18.10 The BCP/Dorset 'Continuum of Need' document should be used to help clarify the pathway required for a child: whether concerns will be managed within the school; or with the help of other agencies as part of early help; or whether they require specialised support such as a social work assessment or referral to Child and Adolescent Mental Health Services (CAMHS).

18.11 A member of staff who reports concerns to the DSL should expect some feedback, although confidentiality might mean in some cases that this is not detailed. If the member of staff is not happy with the outcome s/he can press for reconsideration and if following this, s/he still believes the correct action has not been taken, will refer the concerns directly to social workers.

# 19. Responding to concerns reported by parents or others in the community

19.1 Occasionally parents or other people in the local community tell school staff about an incident in or accumulation of concerns they have about the family life of a child who is also a pupil at the school.

19.2 If the incident or concern relates to child protection/safeguarding, the information cannot be ignored, even if there are suspicions about the motives of the person making the report. Members of staff will therefore pass the information to the DSL in the usual way.

19.3 It is preferable if the parent / community member who witnessed or knows about the concerns or incident makes a call to the MASH team themselves as they will be better able to answer any questions. They can ask for their name not to be divulged if a visit is made to the family.

19.4 If the parent / community member refuses to make the referral, the DSL will clarify that s/he (the DSL) has a responsibility to do so and will also need to pass on to social workers how s/he is aware of the information.

19.5 This process also applies to parents / community members who are also school staff. As professionals who work with children they cannot be anonymous when making the referral but can ask for the situation to be managed sensitively and, if necessary, for their identity to be withheld from the family if it will cause difficulties in their private life.

# 20. Remember

20.1 Any suspicion or concern that a child or young person may be suffering or at risk of suffering significant harm, MUST be acted on. Doing nothing is not an option. Any suspicion or concerns will be reported without delay to the DSL or a Deputy. During term time the Designated Safeguarding Lead and/or a Deputy should always be available (during school hours) for staff to discuss any safeguarding concerns. However, if for whatever reason they are not available, the staff member will discuss their concerns as soon as possible with either

another senior member of staff or

BCP MASH 01202 123334

Email: childrensfirstresponse@bcpcouncil.gov.uk

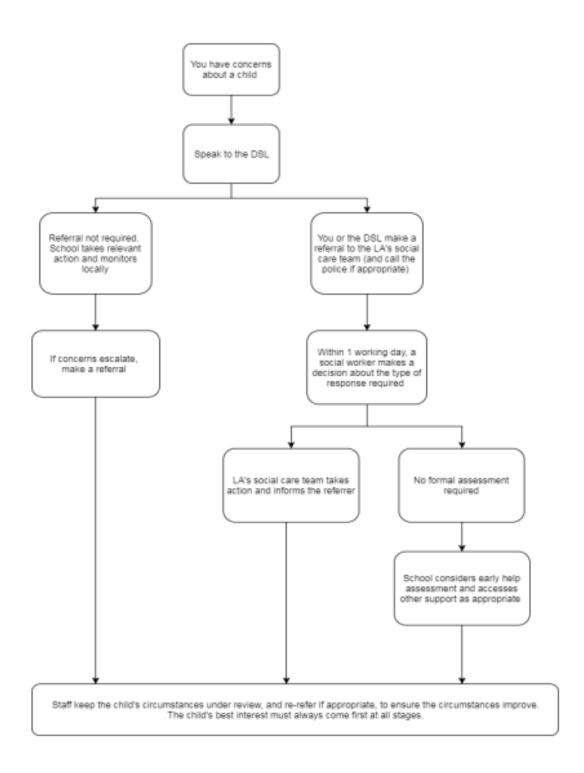
Out of Hours Service 01202 738256

• Email: childrensoohs@bcpcouncil.gov.uk

• Hampshire MASH 0300 555 1384 during office hours 8.30am to 5pm Monday to Thursday, 8.30am to 4.30pm on Friday

 Out of Hours Service 0300 555 1373 at all other times to contact the Out of Hours service

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
(Note –if the DSL is unavailable, this should not delay action.)



#### Anyone can make a referral, not just the DSLs.

19.2 It is important that everyone in the school is aware that the person who first encounters a case of alleged or suspected abuse is not responsible for making a judgement about whether abuse has occurred and should not conduct an 'investigation' to establish whether the child is telling the truth. That is a task for social workers and the Police following a referral to them of concern about a child. The role of school staff is to act promptly on the information received.

19.3 This applies regardless of the alleged 'perpetrator': whether the child raises concerns about a family member or someone outside school, a member of staff or another child/pupil.

19.4 A careful record will be made of what has been seen/heard that has led to the concerns and the date, time, location and people who were present. As far as possible, staff should record verbatim what was said and by whom. The record will be passed to the DSL.

19.5 The DSL will keep a record of the conversation with the duty worker and other social workers, noting what actions will be taken and by whom, giving the date and time of the referral. The referral will be confirmed in writing on the inter-agency referral form (available on the LSCB website) as soon as possible and at least within 48 hours. Any pre-existing assessments should be attached.

19.6 A school child protection file will be started in the child's name, where the child is not already known to social workers. If a file already exists, the new information will be added to the chronology. Child protection/safeguarding files are recorded on 'My Concern'.

See Appendix 3 below for detailed record keeping guidance.

#### 20. Response from the MASH team to a school referral

#### Referral

Once a referral is received by the team, a manager will decide on the next course of action within one working day. When there is concern that a child is suffering, or likely to suffer significant harm, this will be decided more quickly, and a strategy discussion held with the Police and Health professionals and other agencies as appropriate (section 47 Children Act 1989).

The Designated Safeguarding Lead should be told within three working days of the outcome of the referral. If this does not happen s/he will contact the duty worker again.

# • <u>Assessment</u>

All assessments should be planned and co-ordinated by a qualified social worker. They should be holistic, involving other professionals, parents/carers and the children themselves as far as practicable. Assessments should show analysis, be focused on outcomes and usually take no longer than 45 working days from the point of referral. School staff have a responsibility to contribute fully to the assessment.

# <u>S47 Enquiries (regarding significant harm)</u>

The process of the investigation is determined by the needs of the case, but the child/young person will always be part of that process and sometimes without parents' knowledge or permission. On occasions, this will mean the child/young person is jointly interviewed by the Police and social workers, sometimes at a special suite where a video-recording of the interview is made.

# • The Child Protection Conference

If, following the S47 enquiries, the concerns are substantiated and the child is judged to be at risk of significant harm, a Child Protection Conference (CPC) will normally be convened. The CPC must be held within 15 days of the first strategy discussion and school staff will be invited to attend - normally the DSL or Headteacher. This person will produce a written report in the correct format (a pro forma is available on the LSCB website). This will be shared with the child/young person and his/her family before the conference is held. A copy will also be sent to the person chairing the initial CPC at least 24 hours in advance.

More information is in the inter-agency safeguarding procedures ('Child Protection Conferences') on the LSCB website.

If the DSL disagrees with the decisions made by social workers regarding the outcome of the referral, the conclusions of the assessment or any actions taken, the matter should be discussed and if necessary escalated to more senior managers (under the escalation policy available on the LSCB website), *particularly* if the child's situation does not appear to be improving.

#### 21. Responding to allegations or concerns about staff, volunteers or contractors

- 21.1 Rigorous recruitment and selection procedures and adhering to the school's code of conduct and safer practice guidance will hopefully mean that there are relatively few allegations against or concerns about staff or volunteers. However, if a member of staff, or any other person, has any reason to believe that another adult has acted inappropriately or abused a child or young person, they will act by reporting to the Headteacher (not the DSL if this is a different person). Even though it may seem difficult to believe that a colleague may be unsuitable to work with children, the risk is far too serious for any member of staff to dismiss such a suspicion without acting.
- 21.2 When hiring or renting premises or facilities to other organisations, the governing body must ensure that appropriate safeguarding arrangements are in place (including inspecting these as needed) and that the presence of these is a requirement of any agreement between the school and the other organisation.
- 21.3 Contractors should be made aware of the child protection policy and should read Annex C.
- 21.4 If the allegation/concern is about the Headteacher the person with concerns will contact the Chair of Governors or the Local Authority Designated Officer (also known as the LADO) in the Local Authority Education Safeguarding Advisor. See Appendix 1 below for contact details.

21.5 In all cases of allegations against staff, volunteers or contractors, the Headteacher and Chair of Governors, will contact the Local Authority Designated Officer (LADO) without delay and follow the correct procedures as set out in the separate school policy. This must comply with Part Four of 'Keeping Children Safe in Education' 2024.

21.6 After an allegation has been raised, it is important to consider the welfare of the child(ren) concerned as well as investigating and supporting the person subject to the allegation.

# Concerns that do not meet the harm threshold (Low Level Concerns)

21.7 The term 'low-level' concern does not mean that it is insignificant, it means that the behaviour towards a child does not meet the thresholds as stated above.

- 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.

# Please refer to the separate Low Level Concerns Policy.

21.8 At Highcliffe School we promote an open and transparent culture in which all concerns about all adults working in or on behalf of the school or college (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately. Through training, staff are made aware of what low level concerns are and understand the importance of reporting and these types of concerns in writing.

21.9 At Highcliffe School staff report all low-level concerns to the Headteacher. If reported to the DSL then the DSL will inform the Headteacher of the concern in a timely fashion. The Headteacher will always be the ultimate decision maker in respect of all low-level concerns.

21.10 Through training and induction, we ensure that all staff understand the importance of self-referring, 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.

21.11 At Highcliffe School we understand the importance of recording low-level concerns and the actions taken in light of these being reported. The records are kept confidential and stored securely. We will review the records we hold to identify potential patterns and take action. This could be through a disciplinary process but also by referring to the Local Authority Education Duty Desk on 01603 307797. Please note, where a child, parent/carer or staff member makes an allegation of harm, this will not be considered as a 'low level' concern without consultation with the Local Authority Education Duty Desk or the LADO service directly.

21.12 We recognise that 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. 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.

#### 22. Children with special educational needs and who are disabled

- 22.1 Research shows that children with special educational needs, who are disabled or who have certain health conditions are especially vulnerable to abuse and adults who work with them need to be vigilant and take extra care when interpreting apparent signs of abuse, neglect or exploitation.
- 22.2 Additional barriers can exist for adults who work with such children, in respect of recognising abuse, neglect or exploitation. These can include
  - Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
  - Being more prone to peer group isolation than other children
  - Children with SEN and who are disabled can be disproportionately impacted by things like bullying without outwardly showing any signs; and
  - Communication barriers and difficulties in overcoming these barriers
- 22.3 These child protection procedures will be followed if a child with special educational needs or who is disabled discloses abuse or there are indicators of abuse, neglect or exploitation. There are no different or separate procedures for such children.
- 22.4 Staff responsible for intimate care of children will undertake their duties in a professional manner always and in accordance with the school's intimate care policy.

The SEN department is a space within Highcliffe School where pupils with SEN or disability can go to feel safe and secure within the school environment. This is an area where pupils can be supported by a member of staff to communicate or articulate their feelings without needing to feel conscious about their peers being in close proximity. Support staff receive training on a range of SEN issues and disabilities. However, if more specialist techniques are required, the pupil can be referred to receive support from our Mental Health Support Worker or ELSA support from a specially trained member of staff.

# 23. Children who are lesbian, gay, bi or trans (LGBT)

23.1 The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, in line with 'Keeping Children Safe in Education', we recognise that children who are LGBT or those perceived by other children to be LGBT could potentially be more vulnerable and therefore we work to reduce any additional barriers faced. When families/carers are making decisions about support for gender questioning children, we encourage them to seek clinical help and advice. We provide a safe space for these children to speak out or share their concerns with members of staff. Through our curriculum, we counter homophobic, biphobic and transphobic bullying and abuse.

# 24. Safer Working Practice

- 24.1 All adults who come into contact with children at this school will behave at all times in a professional manner which secures the best outcomes for children and also prevents allegations being made. Guidance should be followed where it is alleged that anyone working in the school or college that provides education for children under 18 years of age, including supply teachers and volunteers 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.

Detailed advice on safer working practice can be found in the school's Code of Conduct. Staff should be aware of Part 4 of Keeping Children Safe in Education 2024.

24.2 We promote a culture whereby members of the school community should feel able to raise with the Headteacher, or any member of the leadership team, any concerns about staff conduct. If the reporter feels that the issue has not been addressed they should contact someone outside of the school, such as the Chair of Governors or the LADO. (See Appendix 1 below for contact details.) Reference to the Guidance for Safer Working Practice 2015.

# 25. Training

- 25.1 Child protection/safeguarding will be part of induction for all staff and regular volunteers new to the school. They will be given a copy of this policy, the Code of Conduct, details about the role of the DSL and part one of 'Keeping Children Safe in Education. Online safety and Harmful Sexual Behaviour in Schools will also be included in safeguarding induction.
- 25.2 This will be followed up by basic child protection/safeguarding training that equips individuals to recognise and respond appropriately to concerns about pupils.
- 25.3 A proportional risk based approach will be taken regarding the level of information provided to all temporary staff and volunteers. As a minimum they will be provided with, and will be expected to follow, the child protection summary sheet available separate from this policy.
- 25.4 Staff who do not have designated responsibility for safeguarding and child protection, including the Headteacher, will receive annual updates and notifications of any necessary changes by email and staff meetings. An outside trainer will hold Safeguarding Training in school at least every three years.
- 25. All staff will have training in preventing radicalisation and extremism ('Prevent') by completing an on-line course.
- 25.6 In addition, all staff members will receive regular safeguarding and child protection updates from the DSL as required, but at least annually. This will include learning from local and national serious cases when the learning becomes available.
- 25.7 When DSLs and Deputies take up the role they will attend enhanced (Level 3) training provided through the LSCB multi-agency course. They must be updated at 2 yearly intervals after that.
- 25.8 In addition, their knowledge and skills will be updated regularly at least annually. These individuals are expected to take responsibility for their own learning about safeguarding and child protection by, for example: taking time to read and digest newsletters and relevant research articles; attending training offered by LSCB on matters

such as domestic abuse, attachment and child sexual and criminal exploitation; completing on-line training on FGM; attending local DSL forums etc.

- 25.9 Designated Teachers for Looked-After Children (mandatory for maintained schools and academies;) will undertake appropriate training. In BCP this is provided by BCP Virtual School.
- 25.10 Headteachers and at least one governor will complete safer recruitment training and the school will ensure that at least 1 member of a recruitment panel is safer recruitment trained.
- 25.11 It is recommended by the LSCB that all governors attend training, briefings or other input which equips them to understand fully and comply with their legal safeguarding duties as governors, set out in 'Keeping Children Safe in Education' 2024. Attendance includes those who also work with children and have attended child protection training in that role.

# 26. Raising concerns about safeguarding practice in our school

- 26.1 In this school we promote a culture where any staff or volunteers feel able to raise with the Headteacher any concerns about safeguarding or child protection practice.
- 26.2 Any issues which they have not been able to resolve with the Headteacher should be reported to the governors in the first instance. If they are still not satisfied they should approach the Director for Children's Services or, if the issue relates to the conduct of or allegation against a member of staff, should contact the Local Authority Designated Officer (also known as the LADO).
- 26.3 Staff should refer to the school's whistle-blowing policy for more information or can use the NSPCC whistle blowing helpline: 0800 0280285.

#### 27. Information for parents and carers

- 27.1 At this school we are committed to keeping our pupils safe. Our first priority is your child's welfare, and we will usually discuss with you any concerns we have about your child. There might be rare occasions, however, when we must provide information to or consult other agencies such as the MASH team before we contact you. This will include situations where we judge that to tell you first will or might put your child at risk of significant harm.
- 27.2 Our responsibilities are set out in this policy. It reflects statutory guidance and the Inter-Agency Safeguarding Procedures, which can be found on the LSCB website.
- 27.3 If you have any questions about this please speak to the Designated Safeguarding Lead: *Mrs Sarah Giller*

#### 28. Contextual Safeguarding

28.1 What is contextual safeguarding? Safeguarding incidents and or behaviours can be associated with factors outside of school or college and /or can occur between children outside of school. All staff especially the DSL or deputy should consider the context within which such incidents and or behaviour occur. This is contextual safeguarding and means assessments should consider such factors, so it is important that schools provide as much

information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and the context of the abuse.

# 29. Photography and images

The vast majority of people who take or view photographs or videos of children do so for entirely innocent, understandable and acceptable reasons. Sadly, some people abuse children through taking or using images, so we must ensure that we have some safeguards in place. To protect children we will:

- Seek their consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Seek parental consent
- Ensure that children are appropriately dressed
- Encourage children to tell us if they are worried about any photographs that are taken of them
- Up-date records regularly about any child whose image cannot be displayed e.g. risk of domestic abuse

#### 30. Covid-19 Safeguarding Procedures

30.1 During any organisation changes due to COVID-19, the guidance found in Keeping Children Safe in Education (KCSIE) will continue to apply alongside the school's safeguarding policy.

30.2 It is the duty of all staff and volunteers working in the school to keep the safeguarding of our students as the highest priority, both children still attending school and those working at home and off site.

30.3 As long as the school remains open to certain children, or if the school in future acts as the hub in a cluster, it will continue to provide a safe environment, keep children safe and ensure staff and any volunteers have been appropriately checked and risk assessments carried out as required.

30.4 On days when the school is open to selected children, there will be a Designated Safeguarding Lead (DSL), Deputy Designated Safeguarding Lead (DDSL), or member of the School Senior Leadership team on site. There will always be a DSL/DDSL available for telephone contact during school hours, should one not be in school that day.

30.5 The DSL/DDSL/Senior Leader on site each day will have responsibility for co-ordinating safeguarding on site. This may include updating and managing access to child protection files, liaising with the offsite DSL/DDSL and as required liaising with children's social workers where they require access to children in need and/or to carry out statutory assessments at the school or college.

30.6 Through My Concern and through the allocated member of staff in school each day, all staff and volunteers will have access to safeguarding support.

#### Vulnerable children

30.7 During any period of school closure due to COVID-19 period, school staff will continue to work with and support vulnerable children.

30.8 Vulnerable children include those who have a social worker and children with EHC plans. These children will be offered support in school during this period, along with the children of parents who are Key Workers. The school has the flexibility to offer a place in school to children on the edges of receiving children's social care support or those the school might view as vulnerable for other reasons.

30.9 Local authorities have the key day-to-day responsibility for delivery of children's social care. Social workers and Virtual School Heads will continue to work with vulnerable children in this period and should support these children to access this provision. The school will work with social workers in encouraging children with a social worker to attend provision, unless in consultation with the child's social worker and family it is agreed this is not in the best interests of the child.

# Safeguarding support for students

30.10 Years 7- 11 are supported by the Heads of Achievement, Deputy Heads of Achievement and Pastoral Leads. In Years 12-13, Heads of Year and the Sixth Form Study Mentor support students. While the school is closed to the vast majority of students, all students will be regularly emailed by pastoral staff with support and guidance. Each year group holds a list of those students identified as the most vulnerable, and these students will be further supported through individual contact by pastoral staff. The Learning Support Team will make contact with students with Special Educational Needs.

30.11 Staff interacting with students working off site are encouraged to look out for signs a child may be at risk. Any such concerns should be dealt with as per the school child protection policy.

30.12 All students have named members of staff that they can contact for support and advice and have the facility to do this through school email.

# Online safety and off-site learning

30.13 During this period the majority of children will not be physically attending school. Staff will continue to interact with children online and will continue to look out for signs a child may be at risk. Any such concerns will be dealt with as per the Child Protection Policy and where appropriate referrals will still be made to children's social care and as required the police. Where students are not accessing lessons or learning, pastoral team will make contact an if necessary will request the child attend school for a period of time to establish good working routines and to check welfare.

30.14 Through the setting of work to be completed at home and online communication with students, school staff will, at all times, act within the boundaries and expectations of the Staff Code of Conduct. Use of online learning tools and online communications will be in line with privacy and data protection/GDPR requirements.

30.15 Throughout any period of COVID-19 restrictions, regular communication with parents will include advice and guidance on how to stay safe online and how to report any concerns. Both students and parents will be signposted to sites and outside agencies that offer support in this area.

#### C. Child Protection Summary for all Visiting Professionals

As an adult working directly with children in this school you have a duty of care towards all pupils. This means you must act at all times in a way that is consistent with their safety and welfare.

It is your responsibility to keep your child protection training up to date; you might be asked for evidence of this.

You must follow the principles of safer working practice, which include use of technology – on no account should you contact or take images of pupils on personal equipment, including your mobile 'phone.

If the behaviour of another adult in the school gives rise to concern you must report it to the Headteacher.

If you have a concern about a child, particularly if you think s/he may be suffering or at risk of suffering harm, it is your responsibility to share the information promptly with the Designated Safeguarding Lead (DSL) or the Deputies who are; Mrs Sarah Giller, Mr Mat Downs, Mr Edward Davies, Miss Lisa Swan. Mrs Sally Riley, Mrs Deeprose, Miss Grant, Miss Browning, Miss Kaplinsky and Ms Parsons are also Level 3 trained.

The following is not an exhaustive list, but you might become concerned as a result of:

- Seeing a physical injury which you believe to be non-accidental
- Observing something in the appearance of a pupil which leads you to think his/her needs are being neglected
- A pupil telling you that s/he has been subjected to some form of abuse
- Overhearing a student discussing sexual harassment or violence or behaving in a way which is considered harassment

In any of these circumstances you must write down what you observed or heard, date and sign the account and give it to the DSL or a Deputy for discussion. If you are not happy with the response, you can go direct to the MASH.

If a pupil talks to you about (discloses) sexual or physical abuse you:

- Listen carefully without interruption, particularly if s/he is freely recalling significant events
- Only ask sufficient questions to clarify what you have heard. You might not need to
  ask anything but, if you do, you must not 'lead' the pupil in any way so should only
  ask 'open' questions
- Make it clear you are obliged to pass the information on, but only to those who need to know
- Tell the DSL or Deputy without delay
- Write an account of the disclosure as soon as you are able (definitely the same day), date and sign it and give it to the DSL.

Do not ask the pupil to repeat the disclosure to anyone else in school, ask him/her or any other pupil to write a 'statement', or inform parents. You are not expected to make a judgement about whether the child is telling the truth.

**Remember** – share any concerns, don't keep them to yourself.

# **Useful Contacts**

# For all referrals (concerns about children, which require a social work assessment)

BCP MASH 01202 123334 Email: childrensfirstresponse@bcpcouncil.gov.uk

Out of Hours Service 01202 738256

Email: childrensoohs@bcpcouncil.gov.uk

For concerns about children residing in Hampshire: Hampshire MASH 0300 555 1384

Hampshire Out of Hours Service 0300 555 1373

# **LADO** and Safeguarding in Education

Email: <u>lado@bournemouth.gov.uk</u> 01202 456744

# **Children Missing Education**

Christchurch & Poole Children 01202 261941

Email: exclusions@poole.gov.uk

Bournemouth Children 01202 456179

Email: C&YPSEducationSocial.WorkService@Bournemouth.gov.uk

#### **Possible Indicators of Abuse**

The following information is not designed to turn school staff into experts, but it will help them to be more alert to the signs of possible abuse. The examples below are not meant to form an exhaustive list; Designated Safeguarding Leads and other staff will find it helpful to refer to Government advice 'What to do if you are worried about a child being abused' (2015) and the inter-agency safeguarding procedures on the Dorset Safeguarding Children Board website.

#### i) Physical Abuse

Most children will collect cuts and bruises in their daily lives. These are likely to be in places where there are bony parts of the body, like elbows, knees, and shins. Some children, however, will have bruising which is less likely to have been caused accidentally. An important indicator of physical abuse is where bruises or injuries are unexplained, or the explanation does not fit the injury or there are differing explanations. A delay in seeking medical treatment for a child when it is obviously necessary is also a cause for concern. Bruising may be noticeable on children with different skin tones or from different ethnic groups and specialist advice may need to be taken.

Patterns of bruising that are suggestive of physical child abuse can include:

- bruising in children who are not independently mobile
- bruises that are seen away from bony prominences
- bruises to the face, back, stomach, arms, buttocks, ears and hands
- multiple bruises in clusters
- multiple bruises of uniform shape
- bruises that carry the imprint of an implement used, hand marks, fingertips or a belt buckle

Although bruising is the commonest injury in physical abuse, fatal non-accidental head injury and non-accidental fractures can occur without bruising. Any child who has unexplained signs of pain or illness must be seen promptly by a doctor.

Other physical signs of abuse can include:

- cigarette burns
- adult bite marks
- broken bones
- scalds

Changes in behaviour which can also indicate physical abuse:

- fear of parents being approached for an explanation
- aggressive behaviour or severe temper outbursts
- flinching when approached or touched
- reluctance to get changed, for example wearing long sleeves in hot weather
- missing school
- running away from home

#### ii) Emotional Abuse

Emotional abuse can be difficult to measure, and often children who appear otherwise well cared for may be emotionally abused by being taunted, put down or belittled. They may receive little or no love, affection or attention from their parents or carers. *Children who live in households where there is domestic violence often suffer emotional abuse*. Emotional abuse can also take the form of children not being allowed to mix/play with other children.

The physical signs of emotional abuse can include:

- a failure to thrive or grow, particularly if the child puts on weight in other circumstances, e.g. in hospital or away from parents' care
- sudden speech disorders
- developmental delay, either in terms of physical or emotional progress.

Changes in behaviour which can also indicate emotional abuse include:

- neurotic behaviour, e.g. sulking, hair twisting, rocking
- being unable to play
- fear of making mistakes
- self-harm
- · fear of parents being approached

#### iii) Sexual Abuse

Adults who use children to meet their own sexual needs abuse both girls and boys of all ages, including infants and toddlers. It is important to remember that children can also be sexually abused by other children (i.e. those under 18)

Usually, in cases of sexual abuse it is the child's behaviour which may cause concern, although physical signs can also be present. In all cases, children who talk about sexual abuse do so because they want it to stop. It is important, therefore, that they are listened to, taken seriously and appropriate action taken promptly.

The physical signs of sexual abuse can include:

- pain or itching in the genital/anal areas
- bruising or bleeding near genital/anal areas
- sexually transmitted disease
- vaginal discharge or infection
- stomach pains
- discomfort when walking or sitting down
- pregnancy

Changes in behaviour which can also indicate sexual abuse can include:

- sudden or unexplained changes in behaviour, e.g. becoming aggressive or withdrawn
- fear of being left with a specific person or group of people
- having nightmares
- missing school
- running away from home
- sexual knowledge which is beyond their age or developmental level
- sexual drawings or language

- bedwetting
- eating problems such as overeating or anorexia
- self-harm or mutilation, sometimes leading to suicide attempts
- saying they have secrets they cannot tell anyone about
- alcohol / substance / drug use
- suddenly having unexplained sources of money
- not being allowed to have friends (particularly in adolescence)
- acting in a sexually explicit way towards adults or other children

#### iv) Neglect

Neglect can be a difficult form of abuse to recognise yet have some of the most lasting and damaging effects on children and young people.

The physical signs of neglect can include:

- constant hunger, sometimes stealing food from other children
- being constantly dirty or smelly
- loss of weight, or being constantly underweight
- inappropriate dress for the conditions

Changes in behaviour which can also indicate neglect can include:

- complaining of being tired all the time
- not requesting medical assistance and/or failing to attend appointments
- having few friends
- mentioning being left alone or unsupervised

It is important that adults in school recognise that providing compensatory care might address the immediate and presenting issue but could cover up or inhibit the recognition of neglect in all aspects of a child's life. Compensatory care is defined as 'providing a child or young person, on a regular basis, help or assistance with basic needs with the aim of redressing deficits in parental care'. This might involve, for example, providing each day a substitute set of clothing because those from home are dirty, or showering a child whose personal hygiene or presentation is such that it is affecting his/her interaction with peers. It does not include isolated or irregular support such as giving lunch money or washing a child who has had an 'accident'. If any adult in school finds s/he is regularly attending to one or more aspects of a child's basic needs then this will prompt a discussion with the Designated Safeguarding Lead.

The general rule is the younger the child, the higher the risk in terms of their immediate health. However, serious neglect of older children and adolescents is often overlooked, on the assumption that they can care for themselves and have made a 'choice' to neglect themselves. Lack of engagement with services should be a potential indicator of neglect.

## Signs and Symptoms of Child Criminal/ Sexual Exploitation

Indicators of child sexual exploitation may include:

- Acquisition of money, clothes, mobile phones, etc. without plausible explanation
- Gang-association and/or isolation from peers/social networks
- Going missing and being found far from home
- Being involved in serious violence, either as victim, perpetrator, or alleged perpetrator
- Receiving drug requests via phone, moving drugs, and handling drug money
- Being exposed to drug concealment techniques like 'plugging'
- Being found in unfamiliar accommodations linked to drug activity
- Owing a debt to exploiters
- Having bank accounts used for drug dealing.
- Exclusion or unexplained absences from school, college or work
- Leaving home/care without explanation and persistently going missing or returning late
- Excessive receipt of texts/phone calls
- Returning home under the influence of drugs/alcohol
- Inappropriate sexualised behaviour for age/sexually transmitted infections
- Evidence of/suspicions of physical or sexual assault
- Relationships with controlling or significantly older individuals or groups
- Multiple callers (unknown adults or peers)
- Frequenting areas known for sex work
- Concerning use of internet or other social media
- Increasing secretiveness around behaviours
- Self-harm or significant changes in emotional well-being
- Potential vulnerabilities include
- Although the following vulnerabilities increase the risk of child sexual exploitation, it must be remembered that not all children with these indicators will be exploited. Child sexual exploitation can occur without any of these issues
- Having a prior experience of neglect, physical and/or sexual abuse
- Lack of a safe/stable home environment, now or in the past (domestic abuse or parental substance misuse, mental health issues or criminality, for example)
- Recent bereavement or loss
- Social isolation or social difficulties
- Absence of a safe environment to explore sexuality
- Economic vulnerability
- Homelessness or insecure accommodation status
- Connections with other children and young people who are being sexually exploited
- Family members or other connections involved in adult sex work
- Having a physical or learning disability
- Being in care (particularly those in residential care and those with interrupted care histories); and
- Sexual identity

More information can be found in: Child sexual exploitation: Definition and a guide for practitioners (DfE 2017)

School staff should be mindful of the above and discuss any concerns with the DSL who will take the appropriate action in accordance with the inter-agency neglect guidance on the LSCB website.

# Guidance for schools on records made when there are safeguarding or child protection concerns

#### These guidelines cover

- General principles of keeping safeguarding and child protection records
- What records should be kept
- How records should be made and kept
- How long schools should retain safeguarding/child protection records
- Access to child protection records / information sharing
- Transfer of child protection records

The guidelines reflect and should be read in conjunction with the following documents:

- Keeping Children Safe in Education September 2023
- Working Together to Safeguard Children 2018
- Information Sharing: Practitioners' Guide 2018
- LSCB Multi-Agency Child Protection Procedures
- Records Management Society Schools Retention Schedule version 4 2015
- Information Commissioner's Office

https://ico.org.uk/for-organisations/guide-to-the-general-data-protectionregulation-gdpr/individual-rights/right-of-access/

- The Education (Pupil Information) (England) Regulations 2005
- Data protection (Subject Access Modification) (Education) order 2000 9SI 2000/414)

Repealed by GDPR/DPA 2018. Replaced by DPA 2018, Schedule 3, Exemptions etc. from the GDPR - Health, Social Work, Education and Child Abuse Data. Specifically, Parts 4 & 5 of the schedule.

#### **Record Keeping: Best Practice**

# To be read and followed by all DSLs and Deputies

#### 1. Introduction

- 1.1 The importance of good, clear child welfare and child protection record keeping has been highlighted repeatedly in national and local Serious Case Reviews.
- 1.2 It is the Designated Safeguarding Lead (DSL)'s responsibility to ensure that child protection files, access, storage and transfer meet the required professional standards as detailed in this document.
- 1.3 The common law of confidentiality, Data Protection and Human Rights principles must be adhered to when obtaining, processing or sharing personal or sensitive information or records. In summary, the Data Protection Act requires that records should be securely kept, accurate, relevant, up to date and kept for no longer than is necessary for the purpose for which they were made. The Data Protection Act 2018 and GDPR do not prevent the sharing of information for the purposes of keeping children safe. This includes allowing practitioners to share information without consent.
- 1.4 Any electronic record keeping system should comply with the general standards set out below. (The 'My Concern' system in use in many local schools has been checked for compliance.)

# 2. Record to be made by an adult receiving a disclosure of abuse (when a child talks about abuse)

2.1 This record should be made as soon as possible **after** the individual hearing the disclosure has reported it verbally to the DSL. The facts, not opinions (unless of relevance), should be accurately recorded in a non-judgemental way. It is important to remember that expressing an opinion as to whether the child is telling the truth is not helpful and can prejudice how a case proceeds.

The record should ideally be on a standard 'concerns' form (LA model available from the Safeguarding and Standards Team or on Nexus) but if this is not used, should include:

- The child's name, gender and date of birth
- Date and time of the conversation
- What was the context and who was present during the disclosure?
- What did the child say? verbatim if possible
- What questions were asked? verbatim
- Responses to questions –verbatim
- Any observations concerning child's demeanour and any injuries
- The name of the person to whom the disclosure was reported
- Printed name, job title of the author and signature and date
- 2.2 Schools should never ask pupils, regardless of their involvement in a child protection matter (i.e. the subject of an allegation, a witness or the alleged 'perpetrator'), to write out their 'statements' of what has happened. In some cases, this could have the unintended consequence of jeopardising a child protection investigation. This applies regardless of whether the incident(s) took place within or outside school.

# 3. Records kept by the Designated Safeguarding Lead

- 3.1 The school uses My Concern as the standard pro forma for recording all 'welfare' and child protection/safeguarding concerns.
- 3.2 The concern will be viewed by the DSL who will make a judgement about what action needs to be taken, in accordance with local inter-agency safeguarding procedures, using the Threshold Tool, if necessary. The decision about any action, whether a referral is made to the MASH, will be recorded clearly by the DSL.
- 3.3 Concerns which initially seem trivial may turn out to be vital pieces of information later, so it is important to give as much detail as possible. A concern raised may not progress further than a conversation by the DSL with the parent, or, at the other end of the scale, could lead to matters being heard in a court.
- 3.4 All 'lower level' / pastoral concerns, which will generally have been discussed with parents/carers, are kept in the child's main file.
- 3.5 My Concern is used to record welfare concerns. Often it is only when a number of seemingly minor issues relating to an individual pupil over a period of time are seen as a whole that a pattern can be identified indicating a child protection concern.

#### 4. Starting a school child protection file

- 4.1 A school child protection/safeguarding file does not necessarily mean that the pupil is or has been the subject of a child protection conference or plan. Pupils and families may have had Early Help support and input from other agencies.
- 4.2 It is the responsibility of the DSL to start a school child protection/safeguarding file when a social worker is or was involved, e.g.: -
  - A formal referral is made by the school to the MASH on an inter-agency referral form or
  - b) Social care inform the school they have commenced an assessment in relation to a pupil resulting from information from another source or
  - c) A child protection/safeguarding file is forwarded to the school by a previous school or pre-school attended by the pupil or
  - d) A child who is in care/looked after transfers into the school or
  - e) A pupil is privately fostered
- 4.3 It is not good practice to make 'family files'; each child should have his/her own record which includes information specific to him/her and which will be sent to the next school at the time of transfer. The names of siblings and/or other children who live in the household who also attend the school should be clearly noted on individual files.
- 4.4 If two (or more) pupils at the school are referred to the MASH for the same concern (for example, an allegation of sexually harmful behaviour), then child protection files will be started on both/all pupils.

- 4.5 'Document wallet' type files are not ideal as the papers therein can easily fall out or get 'out of order'.
- 4.6 School child protection/safeguarding files are never 'closed' or de-categorised. Once a school has started a child protection file, the chronology is maintained so that any future concerns can be considered in the context of past events, even if Social Care ceases involvement.
- 4.7 Note If there is an allocated social worker because a child is disabled or a young carer and there are no child protection concerns then a child protection/safeguarding file should not be started.
- 4.8 The School records all new child protection and safeguarding notes on My Concern. Secure access to these files is restricted to the Designated Safeguarding Lead and the Deputy Safeguarding Leads. Paper files that were in place before My Concern was introduced to the school and those that are sent to the school as part of a pupil transfer are stored securely.

# 5. Adopted children

- 5.1 When a pupil is admitted to a school in Reception class and parents provide the information that s/he was adopted prior to commencing education, this should be recorded with their permission on the main school file in order that appropriate support can be provided in future if necessary. In these situations, it is not necessary to start a child protection file **unless** the criteria described above (at 4.2a and 4.2b) also apply.
- 5.2 Some older adopted children will have school child protection files because they were initially in care/looked after and were subsequently adopted. During the period when the child is 'placed for adoption' (prior to an adoption order being made) any file that contains information that identifies both the birth family, and the adoptive family must be classed as highly sensitive and this information should only be shared on a strictly 'need to know' basis.
- 5.3 Once the adoption order has been made the DSL in the school that holds the child protection file must overhaul the file. The principle is that there must be nothing that identifies the child's birth name or the birth family. In sifting the file, it is acceptable to destroy documents that will continue to be held by other agencies: for example, child protection conference minutes and LAC review minutes which will be in Social Care records.
- 5.4 A chronology should be prepared that gives an overview of the information previously held in the file but without giving the child's birth name or any details which would identify the birth family.
- 5.5 The overhauled file should only contain the new chronology and any information that has originated from within school (for example concern forms). This file should now be in the child's new name, contain no information which identifies the birth name or birth family, will be held in the school as long as the child remains or sent onto a new school as described (at 9) below.

5.6 Please note that once a child is adopted, <u>all</u> school records, not just cp files, must be amended so that there is nothing which gives the birth name or identifies the birth family.

# 6. The format of child protection files

- 6.1 It is helpful if individual files have a front sheet with key information about the pupil and contact details of parents/carers, social worker and any other relevant professionals.
- 6.2 If the child is Looked-After the front sheet should include important information about legal status, parental responsibility, arrangements for contact with birth parents and extended family, levels of authority delegated to carers and the name of the virtual school head in the authority that looks after the child.
- 6.3 If a pupil is or was subject of a child protection plan or in care/looked after, this should be highlighted in some way to make it immediately obvious to anyone accessing the record.
- 6.4 It is a multi-agency standard that children's child protection files must have at the front an up-to-date chronology of *significant* incidents or events *and* subsequent actions/outcomes. Maintaining the chronology is an important part of the DSL role; it aids the DSL, Deputy and others to see the central issues 'at a glance' and helps to identify patterns of events and behaviours.
- 6.5 It should make sense as a 'stand-alone' document: anyone else reading the chronology should be able to follow easily what the concerns are/have been, whether the concerns have escalated and why, plus the actions taken by the school to support and protect the child. This will be particularly useful for DSLs in receiving schools when pupils transfer, for professionals involved in collating information for Serious Case Reviews and for parents/pupils/ex-pupils if they view the record.
- 6.6 Once a chronology is started it should be updated as appropriate even if Social Care later ceases involvement (see 4.6 above).
- 6.7 The file should be well organised and include, as appropriate, school 'concern forms', copies of correspondence, school reports to and minutes of child protection conferences, documents relating to children in care/'looked after' etc. The DSL will decide which relevant information which pre-dates the starting of the child protection file, such as CAF or other pastoral care documentation, will also be included.

#### 7. Storage

- 7.1 All records relating to child protection concerns are sensitive and confidential so will be kept in a secure (i.e. locked at all times) filing cabinet, separate from other school files, and accessible through the DSL, the Deputy(ies) and other senior staff in larger schools.
- 7.2 The pupil's general school file should be marked in some way (e.g. a yellow star) to indicate that a child protection file exists. All staff who may need to consult a child's school file should be made aware of what the symbol means and to speak to the DSL if necessary if they see this symbol and have concerns. For example, a member of the office staff who is looking in the main file for a parent's contact details because of unexplained absence might decide to report this to the DSL if they see the indicator, in case the absence is significant.

# 8. Sharing of and access to child protection records

- 8.1 Access to, and sharing of, information should be on a need-to-know basis, decided case by case. The DSL is the best person to decide this. Consideration must also be given to what needs to be shared. In general, the closer the day-to-day contact with the child, the more likely the need to have some information.
- 8.2 The child who is the subject of a child protection record has the right to access the file, *unless* to do so would affect his/her health or well-being or that of another person, or would be likely to prejudice a criminal investigation or a Section 47 assessment (which relates to significant harm) under the Children Act 1989.
- 8.3 Parents (i.e. those with parental responsibility in law) are entitled to see their child's child protection file, with the same exemptions as apply to the child's right to access the record. Note that an older pupil may be entitled to refuse access to the record by his/her parents. As a guide, this applies to pupils who are 12 years of age or above, if they are of normal development or maturity.
- 8.4 References by name to children other than the pupil who is the subject of the file should be removed when disclosing records, unless consent is obtained from the individual/s concerned (or their parents/carer on their behalf). Care must be taken to ensure all identifying information is removed from the copy of the record to be shared.
- 8.5 Always seek advice from your legal advisor or Data Protection Officer if there are any concerns or doubt about a child or parents reading records. However, it is generally good practice to share all information held unless there is a valid reason to withhold it, e.g. to do so would place the child or any other person at risk of harm. Any requests to see the child's record should be made in writing to give time for confidential information, such as any details of other pupils, to be removed.
- 8.6 In respect of requests from pupils or parents for information which wholly or partly consists of an educational record, access should be granted within 15 school days. This might be relevant to 'welfare' concerns in a main school file, for example. Viewing-only access to these records is free but it is reasonable to charge for copies on a sliding scale from £1 £50 (maximum) depending on the number of pages.
- 8.7 However, should the request only seek access to a child protection file (which is not classed as an educational record), access should be granted within 40 calendar days. A discretionary maximum fee of £10 can be charged for viewing access to or a copy of a child protection record.
- 8.8 If the record to be disclosed contains information about an adult professional, that information can be disclosed if it relates to the performance by that person of their job or other official duties e.g. a reference to a teacher in their teaching role or a school nurse in their nursing role. However, if the reference refers to that individual's private life, it should be removed (unless this relates to a child protection matter which is relevant to the record to be disclosed).

- 8.9 Child protection information should not normally be shared with professionals other than those from Social Care, the Police, Health or the Local Authority. Ofsted and other school inspectors can view individual child protection files. Information should not be released to parents' solicitors on request; advice should be sought from the school's legal advisor in such cases.
- 8.10 Governors, including the Nominated Governor, should not access the records.

# 9. Transfer of child protection records

- 9.1 When a pupil transfers to another school (including to a Learning Centre because of permanent exclusion) the DSL should inform the receiving school as soon as possible in person or by telephone that child protection records exist. The original records must be passed on either by hand or sent by recorded delivery, separate from the child's main school file. Care must be taken to ensure confidentiality is maintained and the transfer process is as safe as possible.
- 9.2 If the records are to be posted, they should be copied and these copies retained until there has been confirmation <u>in writing</u> that the originals have arrived at the new school. They can then be shredded.
- 9.3 Whether child protection files are passed on by hand or posted, there should be written evidence of the transfer (such as a form or slip of paper signed and dated by a member of staff at the receiving school.) This receipt should be retained by the originating school for 6 years (in line with guidance from the Records Management Society).
- 9.4 If the pupil is removed from the roll to be home educated, the school should pass the child protection file to the LA EHE Administrator and a receipt obtained as described above.
- 9.5 If a pupil with a child protection record leaves the school without a forwarding address and no contact is received from a new school the DSL should follow the school's Child Missing Education (CME) procedures. If there is reason to suspect the pupil is suffering harm then the DSL will refer to the MASH in the usual way.
- 9.6 If a child arrives in the school in an unplanned way and / or there are concerns about them from the outset, it is worth contacting the previous school for a discussion with the DSL. There might be a child protection file which has not been passed on.
- 9.7 School 'welfare' or pastoral records (i.e. where concerns or issues have been raised but there has been **no** referral to or involvement by a social worker) should also be passed on to the next school for their information and can be included in the main school file, for example. In respect of data protection, parents/carers should be made aware (either individually or through newsletters, for example) that information is transferred in this way to enable the next school to properly support their child. Most parents will understand the reason for this but if for whatever reason a parent disagrees with you passing on non-child protection documents, you should not do so.

# 10. 'Dual registered' pupils

10.1 Where a pupil is on roll at the school and starts to attend a Learning Centre (LC), the chronology and other relevant information in the child protection file should be copied and

passed to the DSL at the LC at the earliest opportunity. Because of the nature of such 'bespoke' arrangements for individual pupils, the two DSLs should agree on which one of them will keep the chronology updated and how best to communicate to each other significant events and issues in relation to that pupil.

#### 11. Retention of records

- 11.1 The school should retain the record for as long as the pupil remains in school and then transfer as described above.
- 11.2 Guidance from the Records Management Society is that when a pupil with a child protection record reaches statutory school leaving age (or where the pupil completed 6<sup>th</sup> form studies), the last school attended should keep the child protection file until the pupil's 25<sup>th</sup> birthday. It should then be shredded (and a record kept of this having been done, date, and why).
- 11.3 The Independent Inquiry into Child Sexual Abuse has instructed relevant organisations, including schools and colleges, that they should NOT destroy, for the foreseeable future, any of their records that could potentially come within the scope of the inquiry (i.e. any records relating to sexual abuse).

# 12. Electronic child protection records

- 12.1 Electronic records must be password protected with access strictly controlled in the same way as paper records.
- 12.2 They should be in the same format as paper records (i.e. with well-maintained chronologies etc) so that they are up to date if/when printed, if necessary.
- 12.3 Electronic files must not be transferred electronically to other schools unless there is a secure system in place but should be printed in their entirety, linked with paper documentation such as conference minutes and transferred as described in section 9 above. When the receipt has been returned to confirm that the file has been received at the new school, the computer record should be deleted.

#### 13. Sharing information with Further Education (FE) Colleges

13.1 A protocol is in place with DSLs at FE colleges: at the start of each academic year, they will send to secondary school DSLs a list of newly enrolled students who have previously attended the school, requesting any relevant information. The school DSL will transfer the necessary child protection/safeguarding files to the FE institution.