

# Lucton School



## Safeguarding Policy

Staff Responsible	Sharron Goode - DSL
Reviewed By	Governors
Date Reviewed	September 2021
Frequency of Review	Annually
Next Review	September 2022

The School refers to all staff and students at Lucton School, which includes Early Years Foundation Stage (EYFS), the Prep School (Year Reception -5), the Middle School (Year 6-8), the Senior School (Years 9-11) and the Sixth Form (Years 12 &13).

The 'parent' refers to those who have parental responsibility for the child.

At Lucton, we are committed to safeguarding and child protection in line with the statutory guidance.

**Safeguarding and promoting the welfare of children is everyone's responsibility.**

All staff have read and understood Part One & Annex B of Keeping Children Safe in Education (2021).

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## Scope of Policy:

Safeguarding is defined as:

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

The term 'safeguarding children' covers a range of measures including child protection procedures. It encompasses a whole-school preventative approach to keeping children safe, including online that incorporates pupil physical and mental health and safety; school behaviour and preventing peer on peer abuse; supporting pupils with medical conditions; Relationships, Sex and Health (RSE) education and personal, social health, and economic education; providing first aid and site security.

Consequently, this policy is consistent with all other policies adopted by the governors and should be read alongside the following policies relevant to the safety and welfare of our pupils as listed below under 'Related Policies'.

This policy applies to all staff in our school. For the purposes of this policy:

- **Staff** refers to all those working for, or on behalf of, the School, full time or part time, in a paid or voluntary capacity. A volunteer is a person who performs an activity that involves spending time, unpaid in School (except for approved expenses).
- **Parent** refers to birth parents and other adults who are in a parenting role, for example step-parents, foster carers and adoptive parents.
- **Child** refers to all pupils on the School roll, including any over the age of 18.
- **Abuse:** 'a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act or prevent harm. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults, or another child or children.' (KCSiE September 2021)

Any safeguarding concerns or disclosures of abuse relating to a child either at School or outside of School hours and online are within the scope of this policy.

## Related Policies

This Policy should be read in conjunction with the following policies:

- |                                   |                                 |
|-----------------------------------|---------------------------------|
| ➤ Acceptable Use of ICT Agreement | ➤ Curriculum Policy             |
| ➤ Anti-bullying Policy            | ➤ Data Protection Policy        |
| ➤ Behaviour and Discipline Policy | ➤ Equality and Diversity Policy |
| ➤ Bereavement Policy              | ➤ EYFS Supervision Policy       |
| ➤ Boarding Principles             | ➤ First Aid Policy              |
| ➤ CCTV Policy                     | ➤ Health and Safety Policy      |
| ➤ Code of Conduct (Staff)         | ➤ Mental Health Policy          |
| ➤ Code of Conduct (Governor)      | ➤ Missing Child Policy          |
| ➤ Code of Conduct (Pupils)        | ➤ Peer on Peer Abuse Policy     |
| ➤ Complaints Procedure            | ➤ PSHE Policy                   |

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- Privacy (Pupils) Policy
- Pupil Supervision Policy
- Risk Assessment Policy
- RSE Policy
- Safer Recruitment Policy
- Searching, Screening and Confiscation Policy
- Self-Harm Policy
- Whistleblowing Policy

This policy should be considered with the wider national framework of:

- [Working Together to Safeguard Children \(DfE 2018\)](#)
- [Keeping Children Safe in Education \(DfE September 2021\)](#)
- [National Minimum Standards for Boarding \(DfE 2015\)](#)
- [Information Sharing \(HM Govt July 2018\)](#)
- The procedures of Herefordshire Safeguarding Children Partnership '[Right Help Right Time](#)'
- The Children Act 1989
- The Education Act 2002 s175 / s157
- [Teacher's Standards \(2011\)](#)
- [What to do if you are worried a child is being abused \(DfE, 2015\)](#)
- [Use of reasonable force in schools \(DfE, 2013\)](#)
- [Mental Health and Behaviour in Schools: Departmental Advice \(DfE, 2018\)](#)
- [Preventing and Tackling Bullying: Advice for Head Teachers, Staff and Governing Bodies \(DfE, 2017\)](#)
- [Prevent Duty, Counter Terrorism and Security Act 2015](#)
- [Serious Crime Act 2015](#)
- [Sexting in Schools and Colleges: responding to incidents and safeguarding young people \(UK Council for Child Internet Safety, 2016\)](#)
- [Sexual violence and sexual harassment between children in schools and colleges](#)
- [Criminal exploitation of children and vulnerable adults county lines \(Home Office Guidance\)](#)
- [Child missing from home or care \(DfE statutory guidance\)](#)
- [Child sexual exploitation advice for practitioners \(DfE advice for practitioners\)](#)
- [Children missing education \(DfE advice for schools\)](#)
- Domestic abuse (Home Office advice)
- Drugs (DfE and ACPO guidance)

## Contacts

Within School, contact the following:

Designated Safeguarding Lead (DSL)	Mrs Sharron Goode	01568 782205
Prevent SPOC		<a href="mailto:s.goode@luctonschool.org">s.goode@luctonschool.org</a>
Operation Encompass SPOC		
Designated Teacher for Children with a Social Worker		

Deputy DSLs	Mrs Elmien Niblett	01568 782238
		<a href="mailto:e.niblett@luctonschool.org">e.niblett@luctonschool.org</a>
	Mr David Bicker-Caarten	01568 782017
		<a href="mailto:d.bicker-caarten@luctonschool.org">d.bicker-caarten@luctonschool.org</a>
	Mrs Irona Powell	01568 782218
		<a href="mailto:i.powell@luctonschool.org">i.powell@luctonschool.org</a>
Safeguarding Governor	Dr Tony Paterson	<a href="mailto:ChairOfGovernors@luctonschool.org">ChairOfGovernors@luctonschool.org</a>

Designated Teacher for Looked After Children Mrs Elmien Niblett

01568 782238

[e.niblett@luctonschool.org](mailto:e.niblett@luctonschool.org)

If you are worried about a child and cannot contact the DSL/Deputies, you can report directly to the following:

Herefordshire Local Authority Designated Officer (LADO)

01432 261739

[LADO@herefordshire.gov.uk](mailto:LADO@herefordshire.gov.uk)

Herefordshire Multi-Agency Safeguarding Hub (MASH)

01432 260800

MASH Emergency Duty Team (out of hours)

01905 768020

Herefordshire Early Help Hub

01432 260261

Police (if child is in immediate danger)

999

Police (if safeguarding concern but not immediate danger)

101

[contactus@westmercia.pnn.police.uk](mailto:contactus@westmercia.pnn.police.uk)

Childline

0800 1111

NSPCC

0808 800 5000

Family Assessment Safeguarding Team (FAST)

01432 261628

### Local Multi Agency Safeguarding Arrangement

#### Note:

The Children and Social Work Act 2017 (the Act) replaced Local Safeguarding Children Boards with new local safeguarding arrangements led by three safeguarding partners (local authorities, chief officers of police and clinical commissioning groups). The Act places a duty on those partners to make arrangements for themselves and **relevant agencies** they deem appropriate to work together for the purpose of safeguarding and promoting the welfare of children in their area. Education is one of the relevant agencies.

In Herefordshire, the arrangements are referred to as the Herefordshire Safeguarding Children Partnership (HSCP).

More information can be found through the Right Help Right Time website

(<https://herefordshiresafeguardingboards.org.uk/herefordshire-safeguarding-children-partnership/for-professionals/right-help-right-time-levels-of-need/> )

## **Part 1 Introduction**

The aim of this policy is to ensure:

- all our pupils are safe and protected from harm;
- safeguarding procedures are in place to help pupils to feel safe and learn to stay safe;
- adults in the school community are aware of the expected behaviours and the school's legal responsibilities in relation to safeguarding and child protection;
- early help or intervention is promoted.

**In all circumstances the welfare of the children concerned will be the priority.**

It is everyone's responsibility to safeguard and promote the welfare of children, this includes everyone who comes into contact with children and their families. Everyone should consider, at all times, what is in the best interest for the child.

**Lucton School is committed to safeguarding and promoting the welfare of all its children. We believe that:**

- all children/young people have an equal right to be protected from harm, to speak freely and voice their opinions and beliefs in a respectful, supportive environment
- all children/young people have the right to be supported to meet their emotional and social needs as well as their educational needs
- all staff, volunteers and visitors have an important role to play in safeguarding children and protecting them from abuse
- where there is a safeguarding concern, governing bodies, proprietors and school or college leaders should ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide

**As a boarding school, supervision has to be extra vigilant to ensure the wellbeing of all its children.**

We at Lucton understand the additional factors we must consider with regard to safeguarding. Members of staff are alert to inappropriate pupil relationships and the potential for peer-on-peer abuse.

We will follow all guidance as set out by KCSiE 2021 p38 and The National Minimum Standards for Boarding Schools. Some overseas pupils do not return home in the holidays and reside with guardians arranged by their agents. Lucton does not arrange or appoint guardians for overseas pupils.

Where a child is suffering harm, or is likely to do so, immediate action will be taken to protect the child. Action will also be taken to promote the welfare of a child in need of early help or intervention, even if they are not suffering harm or are not at immediate risk.

Lucton has a responsibility to have in place a process for responding to allegations made against those who work with children on a paid or voluntary basis. Where there is reasonable cause to suspect that a child is suffering or is likely to suffer significant harm due to abuse by one or more pupils, a referral will be made to the MASH.

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Where bullying is thought to have taken place, but a child has not suffered significant harm or is not likely to suffer significant harm the School's anti-bullying policy will be followed. In the event of disclosures about pupil on pupil abuse all children involved, whether perpetrator or victim, will be treated as being "at risk".



## Part 2 – The Policy

1. Lucton School's ethos is based on our Personal and Moral Values of Compassion, Courage, Initiative, Integrity, Responsibility and Respect. We all have a responsibility to ensure that this is provided for each individual child and adult in our School.
2. Child protection will have the highest priority at Lucton and as a minimum we will protect young people from physical, sexual or emotional abuse and monitor to ensure that they are not neglected. We will also provide a range of opportunities and levels of support to enable each young person to express any fears, concerns or worries that they have either within or in the home environment
3. We endeavour to equip children with the skills needed to keep them safe particularly through our PSHE and RSE curriculum
4. Child protection is rooted in ensuring that the school organisation, its activities, staffing and procedures are aimed at providing an environment in which young people feel secure and happy and in which their individual needs are met.
5. We will support pupils who have been abused in accordance with his/her agreed Child Protection Plan.
6. We will work appropriately with each child, their family and other agencies to protect in all cases the welfare of the child. Furthermore we will work in partnership and fulfil the ethos and abide by the principles of the HSCP. Furthermore, all school staff will be prepared to identify children who may benefit from early help. For avoidance of doubt, early help means this school will provide support as soon as a problem emerges at any point in a child's life from foundation through to teenage years
7. We practice safe recruitment in checking the suitability of staff and volunteers to work with children.
8. The school will maintain a register of child protection issues and confidential files on individual children known to be, or suspected of, being at risk.
9. The school believes that those who work within the school community are in positions of trust and as such codes of conduct are based on the underlying principle that the highest standards are expected from all. In line with KCSiE there is a separate Code of Conduct, which is issued to all staff and governors.
10. All staff will receive regular safeguarding training, ensuring that they are aware of their responsibilities, particularly around recognising signs of abuse and how to make referrals 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 (as identified on pages 12 and 13 of KCSiE 2020), along with the role they might be expected to play in such assessments. Also staff will be made aware of the flowchart from KCSiE 2021 page 23 'Actions where there are concerns about a child' (Appendix 2 of this document).
11. Staff will be made aware that their role is to refer information onwards to the appropriate person or agency and never to act as an investigator.
12. This policy details how staff should act where an allegation is made by a child/adult towards a member of staff. All staff must adhere to the procedures in line with national guidelines and KCSiE Part 4 'Allegations made against/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors'.

## Part 3 - Role and Responsibilities

No one in the school will manage concerns about a child in isolation. Everyone will identify concerns, share information and take prompt action.

The role of the DSL and the Deputy Designated Persons is to advise on safeguarding concerns, support others to carry out their safeguarding duties and liaise with other agencies.

All teachers, including the Headteacher, in accordance with the Teachers' Standards 2012 will safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

### Staff

#### Expectations

All staff are:

- familiar with this safeguarding policy and all associated policies and have an opportunity to contribute to its review.
- alert to signs and indicators of possible abuse and wider safeguarding issues.
- able to record and report concerns as set out in this policy.
- able to deal with a disclosure of abuse from a pupil.
- involved in the implementation of individual education programmes, integrated support plans, child in need plans and interagency child protection plans as required.

In addition, all staff have read and understood Part 1 or Annex A of the latest version of Keeping Children Safe in Education (KCSiE 2021). School leaders and all staff working directly with children have also read Annex B and Part 5.

All members of staff are required to be alert to signs of abuse as listed in Appendix 4. They should report any concerns or suspicions if not immediately, as soon as possible, that day to the DSL. If in doubt they should talk with the DSL, delay is unacceptable.

We recognise that children cannot be expected to raise concerns in an environment where colleagues fail to do so. All of the school community should be aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues. Unacceptable standards, conduct or behaviour should be challenged appropriately at the outset, and will not be tolerated. A separate code of conduct policy has been adopted by this school.

The school's 'Whistleblowing Policy' covers raising concerns. However, where staff feel that they cannot report a concern through the above channels, general guidance can be found at:

<https://www.nspcc.org.uk/what-you-can-do/report-abuse/dedicated-helplines/whistleblowing-advice-line/>

The NSPCC Whistle Blowing Helpline is available for staff who do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

All staff may also refer a suspected case of abuse directly to HSCP. Contact details can be found on page 5 of this policy. If a member of staff does inform HSCP directly, they must let the DSL know.

## Designated Safeguarding Lead (DSL)

Lucton has appointed a member of staff of the School's SLT with the necessary status and authority, Designated Safeguarding Lead, to be responsible for matters relating to child protection and welfare.

### Our DSL is Mrs Sharron Goode.

The Designated Safeguarding Lead shall be given the time, funding, training, resources and support to enable him/her to support other staff on safeguarding matters, to contribute to strategy discussions and/or inter-agency meetings and to contribute to the assessment of children.

The main responsibilities of the Designated Safeguarding Lead are set out in Appendix 5.

If the Designated Safeguarding Lead is unavailable, her duties will be carried out by one of the Deputy Designated Safeguarding Leads.

### The DSLs are Mrs Elmein Niblett, Mr David Bicker-Caarten and Mrs Irona Powell.

In this policy, reference to the Designated Safeguarding Lead includes the Deputy Designated Safeguarding Lead where the Designated Safeguarding Lead is unavailable.

## Governors

As key strategic decision makers and vision setters for the School, the governors will make sure that the policies and procedures are in line with national and local safeguarding requirements. Governors will work with the Senior Leadership Team to make sure the safeguarding essentials are in place, including training, policies, procedures and appointing staff to roles as DSL/DDSLs and Designated teacher for looked after children (even if there are no LAC in school at the time).

Training	Policies and Procedures	Staffing
<ul style="list-style-type: none"> <li>- All staff receive safeguarding training on induction and at least annually</li> <li>- DSL/Deputy DSL receive training and put into practice the legal requirements</li> <li>- DSL/ Deputy DSL receive safeguarding updates and appropriate CPD</li> <li>- Training must include CSE, FGM, Radicalisation and Peer on Peer Abuse</li> </ul>	<ul style="list-style-type: none"> <li>- Safeguarding Policy, including implementation</li> <li>- Peer on Peer Abuse Policy</li> <li>- Online Safety filters and monitoring</li> <li>- Curriculum covers online safety</li> <li>- School maintains information about the legal status of all pupils</li> <li>- Sharing intelligence with West Mercia Police around CSE and the POC within Herefordshire Council</li> <li>- Children Missing from Education</li> <li>- Code of Conduct (Staff and Governors)</li> <li>- Safer Recruitment</li> <li>- Process for managing allegations and concerns about staff</li> <li>- Curriculum Policy including RSE and online safety being taught</li> </ul>	<p>Appointing:</p> <ul style="list-style-type: none"> <li>- DSL</li> <li>- Deputy DSL</li> <li>- Designated teacher for LAC</li> </ul>

The chair of governors is responsible for liaising with the local authority LADO and other partner agencies in the event of an allegation of abuse being made against the Headteacher as shown in Appendix 3.

### **Monitoring and Review**

Governors ensure that safeguarding is an agenda item for every full governing body meeting.

The Headteacher ensures that safeguarding is an agenda item for every staff meeting.

This policy is reviewed annually, or earlier, as required by changes to legislation or statutory guidance.

### **Data Protection**

Data protection fears **MUST NOT** be a barrier to information sharing, as the safety of the child is of the utmost importance.

### **Confidentiality**

We recognise that all matters relating to child protection are confidential. The DSL will disclose personal information about a pupil to other members of staff on a need to know basis only.

However, all staff must be aware that they have a professional responsibility to share information with other agencies in order to safeguard children.

Staff must not keep duplicate or personal records of child protection concerns. All information must be reported to the DSL and securely stored.

All staff must be aware that they cannot promise a child to keep secrets which might compromise the child's safety or well-being or that of another.

## Part 4 - Mandatory Procedures for Staff

### Safer Recruitment

All staff are subject to safer recruitment processes and checks and the School follows the guidance set out in Part 3 of KCSiE 2021. At Lucton, we scrutinise all applications for paid or voluntary posts. We undertake interviews and make appropriate checks through the Disclosure and Barring Service (DBS). We maintain a single central record (SCR) of the essential checks as set out in KCSiE, that have been carried out and certificates obtained.

The SCR applies to:

- all staff (including supply staff, volunteers and teacher trainees on salaried routes) who work at the school.
- all members of the governing body.

### Code of Conduct (Staff and Governors)

Lucton is committed to positive academic, social and emotional outcomes for the pupils underpinned by a strong safeguarding ethos. We are equally committed to the protection and welfare of our staff, who are expected to adhere to the highest standards of professional behaviour.

The Code of Conduct sets out staff behaviours that should be avoided as well as those that constitute safe practice.

Teaching staff are additionally expected to act within the guidance of the 'personal and professional conduct' section of the Teachers' Standards.

### Training

As part of our induction process, staff are required to complete comprehensive safeguarding training, as indicated by the checklist in appendix 9. This is completed face to face and is run by the DSL. All staff also receive regular updates via face to face meetings, inset training, and emails. Boarding staff also receive this training, as well as training on specific safeguarding issues related to boarding. As per our boarding policy:

'In a boarding school, there are some additional factors to consider with regard to safeguarding pupils living away from home. Lucton School follows the requirements set out in the National Minimum Standards and Quality Standards.

Boarding Staff at Lucton receive additional induction and safeguarding training tailored to meet their specific, additional duties. Staff are alert to inappropriate pupil relationships, initiation type behaviours and the potential for peer-on-peer abuse. When living away from home a pupil may be more vulnerable to physical, sexual or emotional abuse and / or neglect.'

The boarding policy also includes specific guidance relating to how staff can provide the highest quality of care within in a boarding environment.

Governors and support staff are included in the definition of staff above.

### Identifying the Signs

All staff know how to recognise, and are alert to, the signs of neglect and abuse and wider safeguarding issues, including but not limited to child-on-child sexual violence and harassment, peer on peer abuse and exploitation. Definitions of abuse, set out in 'What to do if you're worried a child is being abused - Advice for practitioners' (2015) and 'Keeping Children Safe in Education' (2021) and Sexual violence and sexual

harassment between children in schools (2021) and Appendix 4 of this document are important reference documents for all staff.

Every member of staff is provided with a copy of Part 1 or Annex A of KCSIE which they are required to read, and which also includes supporting guidance about several specific safeguarding issues. Staff who work directly with children are also required to read Annex B and Part 5 of KCSiE (2021).

### **Responding to Concerns/Disclosures of Abuse**

Flowcharts (Appendix 8) set out the required procedures for staff to follow when they have a safeguarding concern are displayed in staff areas for easy reference.

All staff adhere to the guidance when concerned about abuse or when responding to a disclosure of abuse (Appendix 1).

All staff record any concern about, or disclosure by, a pupil of abuse or neglect and report this to the D/DSL. It is the responsibility of each adult in School to ensure that the D/DSL receives the record of concern without delay. In the absence of the D/DSL, staff members know to speak directly to.

The D/DSL will liaise with safeguarding partners and work with other agencies in line with Working Together (2018) and will refer to National Police Chief's Council guidance for schools to understand when they should consider calling the police. The D/DSL will provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm.

In some circumstances, the D/DSL, or member of staff, seeks advice by ringing the MASH for advice. (Appendix 2) During term time, the DSL or DDSLs are always available during School hours for staff to discuss any safeguarding concerns.

The voice of the child is central to the safeguarding practice and pupils are encouraged to express and have their views given due weight in all matters affecting them. If concerns are raised or if there is an allegation of abuse or if a child is likely to suffer serious harm the DSL will report this to the MASH as soon as possible and within 24 hours of disclosure.

Should concerns be raised about a child in need the DSL will seek appropriate support from an external agency. Informal discussions with the MASH take place without names being given should the DSL require advice and guidance about the welfare of a child.

### **Online Safety**

At Lucton, we have an Acceptable Use of ICT policy which all pupils must agree to. We use Impero to monitor their online activities and protect from access to inappropriate material.

Online safety is a running and interrelated theme which is reflected in our policies and procedures. Children are taught about safeguarding, including online safety. Online safety is considered as part of our whole school safeguarding approach and wider staff training and curriculum planning. A personalised or contextualised approach is taken for more vulnerable children, victims of abuse and some children with SEND.

Lucton acknowledges the fact that many children have unlimited and unrestricted access to the Internet via mobile phone networks. All years are required to hand in their mobile devices during the school day except the Sixth Form. Sanctions are in place for pupils who do not hand in their phones as required. The Sixth

Form are educated on the sensible and appropriate use of technology, and can receive sanctions if they use the technology inappropriately.

Peer on peer abuse procedures are in place when mobile phones are used by a child whilst in school to sexually harass their peers via their mobile and smart technology, share indecent images: consensually and non consensually (often via large group chat), and view and share pornography and other harmful content.

### **Online Safety – Staff**

As per our Code of Conduct for Staff, staff are required to follow the Acceptable Use of ICT Procedure. As we have EYFS department, for the avoidance of doubt, all conduct must be appropriate for the most stringent requirements demanded by the EYFS setting. Staff are not permitted to use personal mobiles on site in school time.

Staff are required to not activate 4/5G access on site and always use the school Wi-Fi to access personal accounts in designated staff areas only.

Staff should not use any form of social media to contact, like, direct message etc pupils. Staff should not use personal email addresses of pupils or use their own personal email accounts to contact pupils. All communication must go through official School email addresses.

All Nursery staff hand in their phones to the Nursery office while at work.

### **Managing Concerns and Allegations Against Adults (including all staff, volunteers and contractors)**

Lucton School follows the procedure set out in the ‘Allegations Against Adults’ flowchart which is displayed in staff areas for easy reference and is included in Appendix 3.

Where anyone in the School has a concern about the behaviour of an adult who works or volunteers at the School, including Governors and contractors, they must immediately consult the Headteacher, who will refer to the LADO. Should the Headteacher be subject to allegation or suspicion the matter should be referred immediately to the Chair of Governors without notifying the Headteacher first.

All staff must remember that the welfare of a child is paramount and must not delay raising concerns for fear a report could jeopardise their colleague’s career.

We promote an open and transparent culture in which all concerns about adults working in or on behalf of the school (including volunteers and contractors) are dealt with promptly and appropriately. Any allegation of abuse will be dealt with in a fair and consistent way that provides effective protection for the child and at the same time supports the person who is the subject of the allegation. In addition to the concern/ allegation management process, the school’s DSL will also refer suspected abuse to the MASH as described in ‘responding to a concern’.

All members of staff and volunteers have read and signed to confirm that they have understood the schools Staff Code of Conduct (the staff behaviour policy for safer working practise), all contractors are made aware of expectations of their behaviour.

Concerns and allegations reported relating to contractors will be notified to their employers for investigation and potential referral to the LADO.

Lucton will appoint a ‘case manager’ to lead any investigation where the reported allegation does not meet the allegations/ threshold to consider a referral to the LADO. This is the Headteacher or where the Headteacher is the subject of an allegation, the chair of governors.



Those wishing to voice concerns about safeguarding to the Headteacher rather than to the DSL should feel free to do so. What is important is that all information relating to safeguarding issues is passed on and not ignored.

Should circumstances be such that it is difficult for the member of staff or volunteer to contact the DSL or Deputy DSL, e.g. the member of staff/volunteer is accompanying pupils on a trip during School holidays, the member of staff should contact the appointed contact person at School and they will then contact either the DSL or the Headteacher.

If an allegation is made against the DSL the member of staff receiving the allegation must immediately inform the Headteacher. Should he be absent the allegation should be passed to the Chair of Governors. It is the Headteacher's role to handle all allegations about staff.

Should the need arise anyone can make a referral to Children's Social Care and/or the police if necessary. Where a member of staff makes a referral directly, s/he should inform the DSL as soon as possible thereafter.

Further details to be found in Appendix 3.

### **Managing low level concerns about adults**

Lucton operates a 'low-level' concerns policy in accordance with KCSiE 2021.

Low-level refers to behaviour that is: inconsistent with expectations set out in the staff code of conduct, including inappropriate conduct outside of work, and/ or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the DOFA.

Examples of 'low-level' concerns as stated by KCSiE 2021 (p95) include:

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

All low-level concerns will be reported to the Headteacher; low-level concerns about the Headteacher will be reported to the Chair of Governors.

Lucton will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Code of Conduct), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage.

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

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



Reporting low-level concerns helps to create and embed a culture of openness, trust and transparency in which the school's values and expected behaviour are constantly lived, monitored and reinforced by all staff.

Staff are encouraged to self-refer where 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.

All low-level concerns will be recorded in writing (Appendix 6), retained and reviewed to help recognise any weakness in the school safeguarding systems and so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Records of low level concerns will be kept confidential and held securely until the individual leaves their employment.

### **Whistleblowing**

All staff and pupils can raise concerns about poor or unsafe practice and potential failures in the School safeguarding regime. The whistleblowing procedures, as described in the Whistleblowing Policy and as reflected in staff training and the Staff Code of Conduct and shared with pupils are in place for such concerns to be raised with any member of the Senior Leadership Team (SLT).

If a staff member feels unable to raise an issue with SLT or feels that their genuine concerns are not being addressed, other whistleblowing channels are open to them:

- The NSPCC whistleblowing helpline
- Staff can call: 0800 028 0285 from 08:00 to 20:00, Monday to Friday, or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk).
- The Chair of Governors.

Staff must be confident and able to professionally disagree and challenge decision-making as an entirely legitimate activity; a part of our professional responsibility to promote the best safeguarding practice. Staff are encouraged to press for re-consideration if they believe a decision to act/not act in response to a concern raised about a child is wrong.

### **Visitors**

Visitors sign in at Reception when they arrive at the school and are given a badge to wear throughout the day. Safeguarding leaflets are distributed at Reception and visitors are advised to report any concerns to the DSL. If the identity of the visitor is unknown and the visit is unscheduled, then a form of identification needs to be shown.

### **Barring From School Site**

'Although fulfilling a public function, schools are private places. The public has no automatic right of entry. Schools will therefore act to ensure they remain a safe place for pupils, staff and other members of the community'. DfE Best Practice Advice for School Complaints Procedures - January 2016

However unlikely the scenario is, if a parent's behaviour is a cause for real concern, the school will ask him/her to leave the school premises. In serious cases, the Headteacher can notify them in writing that their implied licence to be on school premises has been temporarily revoked subject to any representations that the parent may wish to make.

The school will give the parent opportunity to formally express their views on the decision to bar in writing. The decision to bar will then be reviewed, taking into account any representations made by the parent, and either confirmed or lifted. If the decision is confirmed the parent will then be notified in writing, explaining how long the bar will be in place.

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Anyone wishing to complain about being barred can do so, by letter or email, to the Headteacher or Chairman of Governors. However, complaints about barring cannot be escalated to the DfE. Once the school's own complaints procedure has been completed, the only remaining avenue of appeal is through the Courts; independent legal advice must therefore be sought.

## Part 5 – Supporting Children

We have a whole school approach to listening to children and have systems in place which create an environment where children feel safe to share their concerns and worries and know they will be taken seriously. An alleged victim will never be made to feel like they are creating a problem for making a report. These systems operate with the best interests of the child at their heart.

Children can safely express their views and give feedback. The school's safeguarding team are clearly identifiable to our pupils. We regularly gather pupil voice through frequent School and Boarding Councils, this data informs our practice and policies.

### Curriculum

Our pupils access a broad and balanced curriculum that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life. We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety and well-being.

The PSHE curriculum, incorporating Relationships, Sex and Health (RSE) education specifically includes the following objectives:

- Developing pupil self-esteem and communication skills
- Developing strategies for self-protection such as online safety including when accessing remote learning
- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

### Remote learning

If the school is required to change the way provision to children is offered due to exceptional circumstances (e.g. during a pandemic lockdown, self-isolation), staff responsibilities to remain alert to the signs and risks of abuse to children will continue to apply.

In such circumstances: The DSL will:

- work closely with social care and partner agencies to support children in these circumstances and to identify children who may be at risk for the first time and/or benefit from additional support
- use specific local and national guidance about safeguarding in such circumstances to inform practice e.g. UK Safer internet centre guidance, DfE safeguarding and remote education and will ensure staff, children, and families are provided with written:
  - amended DSL arrangements as required (names, location and contact details)
  - temporary changes to procedures for working with children e.g. online.
  - amended procedures for reporting concerns
  - safeguarding training arrangements
  - timescales for such changes so that all children, families and staff understand when such arrangements will end, and arrangements revert to those in place prior to the events leading to the need for the temporary changes.

We will ensure the curriculum we offer during such circumstances, continues to promote learners' spiritual, moral, cultural, mental and physical development.

### **Early Help**

All staff can identify children who may benefit from early help as a problem emerges and discuss this with the D/DSL.

The Early Help Hub for Herefordshire can be contacted on the following number: 01432 260261.

As soon as the criteria specified by HSCP is met, normal safeguarding procedures apply.

### **Children with Special Education Needs and Disability (SEND) or physical health issues**

Pupils with additional needs or certain health conditions face an increased risk of abuse and neglect.

Staff take extra care to interpret correctly apparent signs of abuse or neglect. We never assume that behaviour, mood or injury relates to the pupil's additional needs without further exploration.

Staff understand that additional challenges can exist when recognising abuse and neglect in pupils with SEND, including communication barriers. Staff recognize that children with SEND are also at a higher risk of peer group isolation and can be disproportionately affected by bullying (including prejudiced based bullying). To address those additional challenges, extra pastoral support is considered for children with SEND or physical health issues and they are also encouraged to discuss their concerns. The D/DSL works with the Special Educational Needs Co-ordinator (SENCo) to identify pupils with additional communication needs and whenever possible, these pupils are given the chance to express themselves to a member of staff with appropriate communication skills.

### **The use of 'reasonable force' in school**

There are circumstances when it is appropriate for staff to use reasonable force to safeguard children. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'.

The use of force may involve either passive physical contact, such as standing pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom. Lucton follows DfE advice for schools is available at Use of Reasonable Force in Schools.

All staff will follow our behaviour policy and all pupils are encouraged to follow these expectations to reduce the need for the need for 'use of reasonable force.' Staff will work in collaboration with pupils and parents/carers to plan positive, proactive behaviour support which may include support plans, referral to specialist agencies and agreeing actions to reduce the occurrence of challenging behaviour.

## Part 6 – Mandatory Procedures – Specific forms of abuse and safeguarding issues

Further details are given in Appendix 4 of this document.

### Peer on Peer Abuse

All of our pupils have a right to attend school and learn in a safe environment. All peer on peer abuse is unacceptable and will be taken seriously.

In addition, we have a zero-tolerance approach and will respond to all reports and concerns of child on child sexual violence and sexual harassment, including those that have happened outside of the school, and/or online. Staff recognise that while both boys and girls can abuse their peers, it is more likely that girls will be victims and boys instigators of such abuse. Peer on peer abuse is not tolerated, passed off as ‘banter’ or seen as part of growing up.

It is likely to include but not limited to:

- bullying (including cyber bullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers
- physical abuse which can include hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm
- ‘upskirting’ or any picture taken under a person’s clothing without their permission or them knowing to obtain sexual gratification or cause humiliation, distress or alarm.
- causing someone to engage in sexual activity without consent
- initiation/hazing type violence and rituals.
- consensual and non-consensual sharing of nudes and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- sexual violence and sexual harassment between children, as defined by Sexual offences Act 2003 which considers rape, assault by penetration and sexual assault, all types of sexual violence. Sexual violence and sexual harassment can be between two children, or a group of children and can occur online and offline.

Consequently, peer on peer abuse is dealt with as a safeguarding concern, recorded as such and not managed through the systems set out in Behaviour and Discipline Policy. Any pupil who may have been victimised and/or displayed such harmful behaviours along with any other child affected by peer on peer abuse will be supported through the School’s pastoral system and the support will be regularly monitored and reviewed.

Both the alleged victim and alleged perpetrator are treated as a safeguarding concern and support is provided by the school for both individuals. We will address inappropriate behaviour (even if it appears to be relatively innocuous) as this can be an important intervention that may help prevent problematic, abusive and/or violent behaviour in the future.

**We acknowledge that even if there are no reported cases of peer on peer abuse, such abuse may still be taking place and is simply not being reported.**

**Staff maintain an attitude of ‘it could happen here’ where safeguarding is concerned.**

We minimise the risk of peer-on-peer abuse by providing:

- a relevant, effective curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation and the mandatory teaching of RSE.
- established/publicised systems for children to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

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- training to all staff so they understand that peer on peer abuse can happen and are trained to be alert to any behaviours that could cause concern
- a clear procedure for all staff to report all incidents as a safeguarding concern to the school D/DSL.

The DSL will follow local and national guidance when there has been a report of sexual violence and harassment between children. This will include liaising with other professionals to develop robust risk assessments and appropriate specialist targeted work for pupils who are identified as posing a potential risk to other children. This is done using a Contextual Safeguarding approach to ensure assessments consider risks posed by any wider factors present in a child's life.

The NSPCC has a dedicated helpline 0800 136 663 to provide children who are victims of sexual abuse in schools with appropriate support and advice. The helpline also provides support to parents and professionals.

### **Serious Violence**

We are committed to success in learning for all our pupils as one of the most powerful indicators in the prevention of youth crime. Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

Staff are trained to recognise both the early warning signs of contextual risks and that pupils may be vulnerable to exploitation and getting involved in gangs as well as indicators that a pupil is involved in serious violent crime. They are also aware of the associated risks and know the measures put in place to minimise such risks.

### **Missing Children and Children Missing Education**

Staff report immediately to the D/DSL, if they know of any child who may be:

- Missing - whereabouts unknown or
- Missing education - (compulsory school age (5-16) with no school place and not electively home educated)

The designated teacher for LAC discusses any unauthorised/unexplained absence of Looked After Children with Virtual School when required. The DSL shares any unauthorised absence of children who have an allocated social worker within 24 hours.

Children who do not attend school regularly can be at increased risk of abuse and neglect.

Where there is unauthorised/unexplained absence, and

- after reasonable attempts have been made to contact the family without success, the DSL follows the SVPP procedure and refers to the MASH team as appropriate.
- there are no known welfare concerns about a pupil, we follow our procedures for unauthorised absence and report concerns to the Education Welfare Service.

### **Mental Health**

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

Staff understand that:

- abuse and neglect, or other potentially traumatic adverse childhood experiences (ACES) can have a lasting impact throughout childhood, adolescence and into adulthood.

Staff are aware of how:

- these experiences can impact on children's mental health, behaviour and education.

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- they have a duty to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

If staff have a mental health concern about a child that is also a safeguarding concern, they will report this concern using the agreed reporting mechanisms.

### **Preventing Radicalisation**

Protecting children from the risk of radicalisation is seen as part the School's wider safeguarding duties and is similar in nature to protecting pupils from other forms of harm and abuse.

Staff use their judgement in identifying pupils who might be at risk of radicalisation and speak to the D/DSL if they are concerned about a pupil.

The D/DSL will always act proportionately, and this may include making a Prevent referral to the Channel support programme or to the MASH.

### **Female Genital Mutilation (FGM)**

FGM is illegal in the UK and a form of child abuse with long-lasting harmful consequences. FGM involves cutting or injuring the female genital organs for non-medical reasons. It is a practice that is not condoned by any religion and can leave physical and mental scars on the girl involved. Since 1985 it has been illegal in the UK but many young girls are sent abroad to have the procedure carried out. The police estimate that around 144,000 girls living in the UK were born of women from FGM practicing countries. It is a wide spread issue predominantly involving countries in Africa and Asia. It is also a very complex issue. While the parents may not wish their daughter to undergo a procedure, they may face pressure from their families and their communities.

Staff will inform the D/DSL immediately if they suspect a girl is at risk of FGM.

Where an act of FGM appears to have been carried out, the case will be reported to the police by the member of staff who discovers it, as required by law. This should be done immediately and is required to have happened within 48 hours by the law.

The number to call is 101.

You should make a note of your actions and record the police reference number as evidence that you have complied with the duty.

If the school are concerned that a child is at risk of FGM a Child Protection referral will be made to the MASH in accordance with interagency procedures produced by the HSCP.

### **Domestic Abuse (Operation Encompass)**

Staff understand that 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.

The abuse can encompass but is not limited to: psychological; physical; sexual; financial; and emotional harm.

The DSL liaises with partner agencies as part of 'Encompass' in Herefordshire. When police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the DSL ensures the organisation receives up to date relevant information about the child's

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circumstances and will ensure key staff provide emotional and practical support to the child according to their needs.

Operation Encompass does not replace statutory safeguarding procedures.



## **Part 7 – Records, Confidentiality, Sharing of Information and Communication with Parents**

### **Records**

All schools must keep educational records on their children until the individual reaches the age of 25 years or in certain circumstances later.

These should include:

- Copies of the reports which have been sent to parents/carers on the child's achievements, as well as other records about those achievements;
- Exchanges of non-routine correspondence between parents and the school;
- Any information the school has on the child's education from the local authority;
- Any statement of special educational needs;
- Any personal educational plan.

There may be other records kept like details of attendance, exclusions, behaviour and family background. This is not compulsory but would be viewed as 'best practice'. The educational record does not include the notes that a teacher makes for his or her own use.

### **The Child Protection File is a separate file to the educational records.**

All members of staff are required to record accurately information that might be required in respect of child protection. Records are not to be kept in the child's normal record file. All records are retained in a 'Child Protection' file, separate from the child's main file. This is securely locked away on the premises and only accessible to the Designated Persons.

The present policy for record keeping is to chronologically record concerns on a confidential file, including details of dates, times, staff involved and action taken. These are handwritten. Handwritten notes are never discarded. Copies of email streams are also useful additions, which can clearly document sequential action. Again, these would be used alongside handwritten notes and by no means be regarded as a substitute action.

The records are reviewed termly by the DSL and checked to be chronological, tidy, legible (where appropriate as in the case of a child disclosure in writing) and where appropriate factual in content, as records may sometimes be immediately required by professionals.

Withdrawal of a record(s) from the school by a Designated Person will be noted and signed for, as will files released to professionals, such as the group solicitor, Child Protection/Safeguarding, LADO, NSPCC or police. In respect of files being released when requested by the Police under Section 29 of the Data Protection Act 2018 a form entitled "Request to external organisation for the disclosure of personal data to the police under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)d)" should accompany that release and a copy will be retained for our records.

This school will also seek advice and adopt HM Government Information Sharing Advice July 2018: [Information sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers](#)

If in any doubt we will seek advice from the school's Data Protection Officer: Simon Jones

Upon releasing records, the school will request ID Badges for release.

The school reserves the right to withhold files where it deems it appropriate in the best interests of the child. In such cases the school will seek advice from HSCP.

### **Serious Incidents**

In cases of alleged child abuse, which come to court, child protection records may be required by the court. Information required by the court should be given to the officers of the court and not to other persons who may use it as evidence. It is not necessary for other background information on the child to be released; this can only be done with parental permission.

In all cases which involve the death or serious harm to a child when abuse is confirmed or suspected, the Local Safeguarding Partnership will require swift response to requests for information from all agencies including schools. Records must be made available to the Case Review Committee – this further emphasises the need for precise and secure keeping of records. In addition, interviews within the Education department involving key personal may be required, in order to assess the quality of decisions made and actions taken.

### **Confidentiality**

All Lucton staff should have read the school's Data Protection Policy.

Data protection fears **MUST NOT** be a barrier to share (and withhold) information, as the safety of the child is of the utmost importance.

Staff will ensure confidentiality protocols are adhered to and information is shared appropriately. If in any doubt about confidentiality, staff should seek advice from a Designated Person, or the school's Data Protection Officer or outside agency as required.

If a child confides in a member of staff and requests that the information is kept secret, it is important that the member of staff tells the child sensitively that he/she has a responsibility to refer cases of alleged abuse to the appropriate agencies for the welfare of that child.

Within that context, the child should however be reassured that this will be shared on a "need to know" basis. If conversations need to take place and confidentiality is paramount to welfare, then these conversations will be held in appropriate settings, away from general areas to protect the confidences of the child.

Whilst adhering to the principle of limiting the spread of information to the minimum number of people, all staff closely involved with a child, for whom there are child protection concerns, should know about the child's circumstances, as it may affect practical matters such as:

- Who meets the child from school;
- Who gives permission to go on school outings and educational visits;
- Who attends parents' evenings;
- Who should or should not share a room at the school or on a trip.

Staff, unless directly asked and supervised, should never raise with a child, information to which they have had access. The child's or young person's feelings should be paramount and many prefer staff not to know about traumatic events in their lives. The importance of discretion in the handling of such information cannot be overstated. Any infringement of this policy, for example by inappropriate discussion in inappropriate settings or the sharing of confidential information for a purpose not sanctioned by the school will be regarded as a serious breach of professional conduct and would lead to disciplinary action against the members of staff concerned.

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Staff will be told in their separate team meetings of present child protection concerns that impact on their work. This will be the duty of the DSL. Such updates will take place on a termly basis or as a new concern is identified. Child protection issues will be on the agenda of staff meetings.

Access to the detailed child protection files will be through the DSL. Requests for access should be limited to those staff that have a direct involvement with the pupil and need to know more about the circumstances.

Should the school's DSL be subject to allegation or suspicion then the Headteacher will take over the role of the DSL.

### **When a Pupil Transfers to Another School or College**

The School:

- liaises with partner organisations to ensure any safeguarding records for learners are shared on transition:
  - by the setting/school/organisation previously attended by the child.
  - by our DSL when the child leaves our school.

For any child dual-registered with another school/setting/organisation, the school continues to be responsible for the safeguarding of the placed pupil thus the DSL will liaise regularly with the DSL at that base to ensure information is shared in the child's best interests. This includes contextual safeguarding information about relationships that young people form in their neighbourhoods, schools and online to enable assessment and intervention to happen within these extra-familial contexts.

- keeps clear and comprehensive written records of all pupil safeguarding and child protection concerns, with a body map, including how the concern was followed up and resolved as well as a note of any action taken, decisions reached and the outcome.
- ensures all pupil safeguarding and child protection records are kept securely in a locked location.
- ensures the records incorporate the wishes and views of the pupil.

The D/DSL acts in accordance with Information Sharing - Department for Education (DfE) (2018) and in line with the Herefordshire Council's Records Management which includes details about file retention. Information about pupils at risk of harm is shared with members of staff on a "need to know" basis.

### **Communication with Parents**

The D/DSL makes a judgement in each case. The School is committed to work in partnership with parents and carers. In most situations, we will discuss initial concerns with them.

However, the D/DSL will not share information where there are concerns that if so doing would:

- place a child at increased risk of significant harm
- place an adult at increased risk of serious harm
- prejudice the prevention, detection or prosecution of a serious crime
- lead to unjustified delay in making enquiries about allegations of significant harm to a child, or serious harm to an adult.

In cases where we know that a child is being privately fostered, staff are to report this to the MASH.

## **Part 8 – Appendices**

Appendix 1 – What to do when responding to a disclosure by a pupil

Appendix 2 – Flowchart – What to do if you're worried a child is being abused or neglected (KCSiE 2021 p23)

Appendix 3 – Allegations Against Staff

Appendix 4 – Understanding and Identifying Abuse and Neglect

Appendix 5 – Role of the Designated Safeguarding Lead (DSL) – Full description

Appendix 6 – Low level Concern Form

Appendix 7 – Child Protection Information Display Posters

Appendix 8 – Staff Information Flowcharts for dealing with Disclosures

Appendix 9 – Safeguarding Induction Checklist

## Appendix 1 - What to do when responding to a disclosure by a pupil

DO	DO NOT
<ul style="list-style-type: none"> <li>✓ Stay Calm</li> <li>✓ Reassure the child – this is not their fault and they have done nothing wrong by confiding in an adult. They have the right to be safe and protected</li> <li>✓ Create a safe environment by offering the child a private and safe place if possible</li> <li>✓ Listen respectfully</li> <li>✓ Tell the child who you will have to tell about this and why</li> <li>✓ Encourage the child to talk, check that you have understood what the child is trying to tell you</li> <li>✓ Use the <b>TED</b> ('Tell me' 'Explain' 'Describe' strategy</li> <li>✓ Listen and remember</li> <li>✓ Record everything you have heard as soon as you can afterwards, using the child's language</li> <li>✓ Report the disclosure as soon as possible</li> <li>✓ Remind the child who you will report this to and why</li> </ul>	<ul style="list-style-type: none"> <li>✗ Tell them you are too busy</li> <li>✗ Communicate shock, anger, embarrassment or annoyance</li> <li>✗ Promise to keep the disclosure secret</li> <li>✗ Make any judgements</li> <li>✗ Tell the child they are wrong/dirty/bad</li> <li>✗ Make comments about the alleged offender</li> <li>✗ Add your opinions or interpretations in your record of the conversation</li> <li>✗ Use your own language in the record</li> <li>✗ Take notes during the disclosure (unless appropriate)</li> <li>✗ Take photographs of any injuries or look at any photos of youth produced sexual imagery</li> <li>✗ Investigate the incident yourself or approach or inform the alleged abuser</li> </ul>

### You must not deal with this yourself.

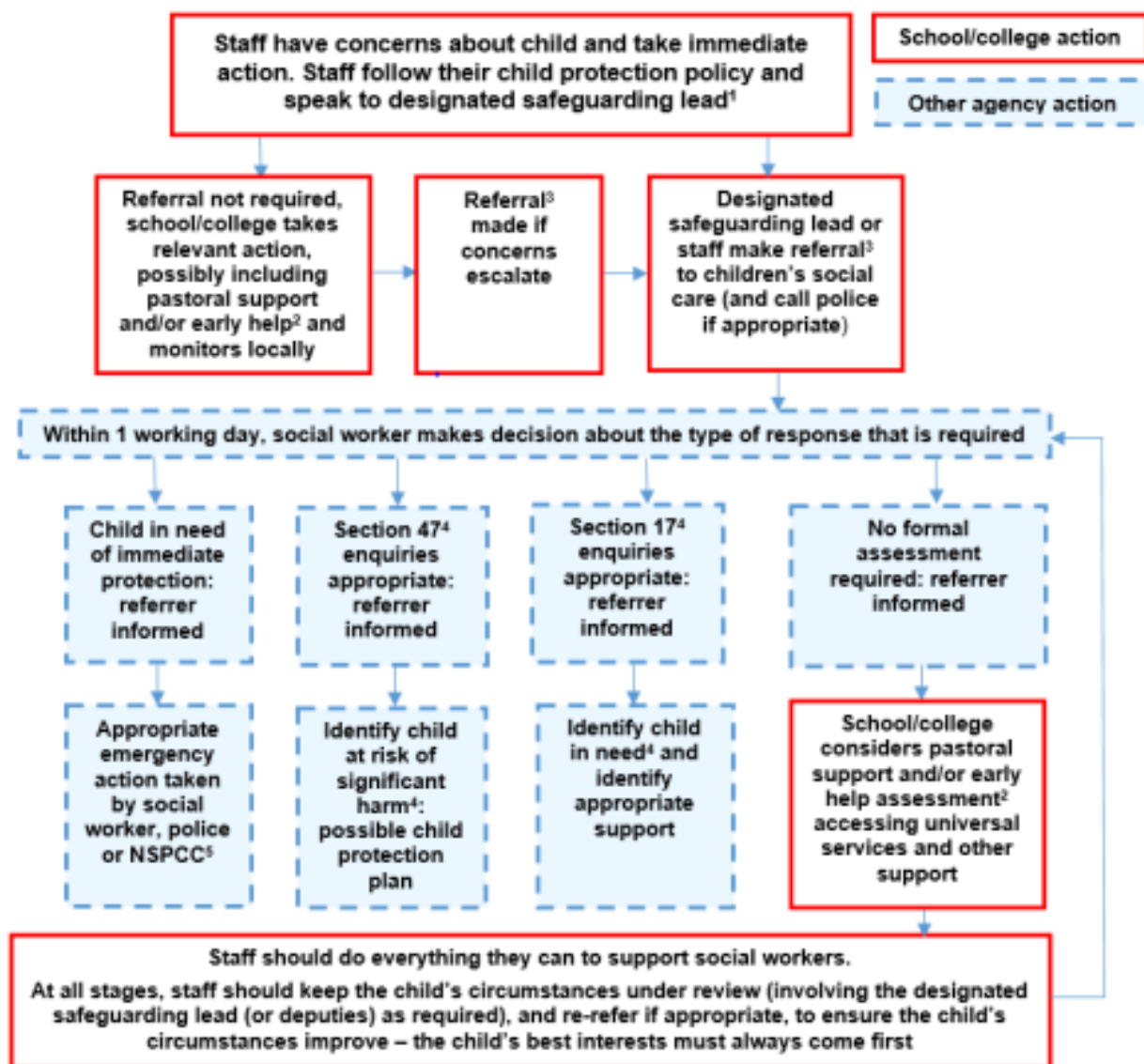
Clear indications or disclosure of abuse must be reported to children's social care without delay, by the Headteacher or the Designated Safeguarding Lead.

Children making a disclosure may do so with difficulty, having chosen carefully to whom they will speak.

We know that listening to and supporting a child/young person who has been abused can be traumatic for the adults involved. Support for you will be available from the DSL or Headteacher.

## Appendix 2 –What to do if you're worried a child is being abused or neglected / KCSiE 2021 P23

### Actions where there are concerns about a child



All concerns will be viewed alongside Herefordshire's Right Help Right time document in order to ensure the appropriate support or intervention is provided at the earliest opportunity in the least intrusive way. The school will also give due regard to the guidance contained in [What to do if you are worried a child is being abused, 2015](#)

In cases where it is not possible to obtain consent from the parent / carer the school will seek advice from the Multi Agency Safeguarding Hub.

The school will review each case to ensure that any support or intervention provided has impacted positively on the welfare / safety of the child or young person and that improvement is sustained.

In the event that provision of Early Help has not led to improvements for the child / young person, or concerns escalate, the school will follow the step-up escalation procedures published by the local Multi Agency Safeguarding Arrangements (HSCP).

In consultation with the Right Help Right time document, if the concerns about the child or young person indicate that they may be at risk of or suffering significant harm a referral will be made to the Multi Agency Safeguarding Hub.

Parents / carers will be informed of the referral unless informing them may place the child / young person at increased risk of harm.

In the event of a professional disagreement in relation to a specific concern, the school will follow the HSCP procedures for resolution of professional disagreements, also known as escalation procedures  
[Escalation policy: Resolution of professional disagreements \(procedures.org.uk\)](https://procedures.org.uk)

### **Involving parents / carers**

In general, safeguarding and child protection concerns will be discussed with parents / carers before approaching other agencies. Consent will be sought prior to making a referral. Appropriate staff will approach parents / carers after consultation with the Designated Safeguarding Lead. However, there may be occasions when the school will contact another agency **before** informing parents/carers because it considers that contacting them may increase the risk of significant harm to the child.

Parents / carers will be informed about the safeguarding policy through newsletters, emails and the website.

### **Multi-agency work**

The school understands its role in the three safeguarding partner arrangements.

The SLT, Governors and DSL will follow the HSCP local procedures.

The school works in partnership with other agencies in the best interests of the children. The school will, where necessary, liaise with the school Matron, and make referrals to children's social care.

Referrals and contacts should be made by the Designated Safeguarding Lead to either the Early Help Hub or the Multi Agency Safeguarding Hub depending on the level of need. Where the child already has a social worker the request for service will go immediately to the social worker involved or in their absence to their team manager or Duty Worker.

The school will co-operate with any child protection enquiries conducted by children's social care. The school will ensure representation at appropriate inter-agency meetings such as team around the family meetings, initial and review child protection conferences, and core group meetings.

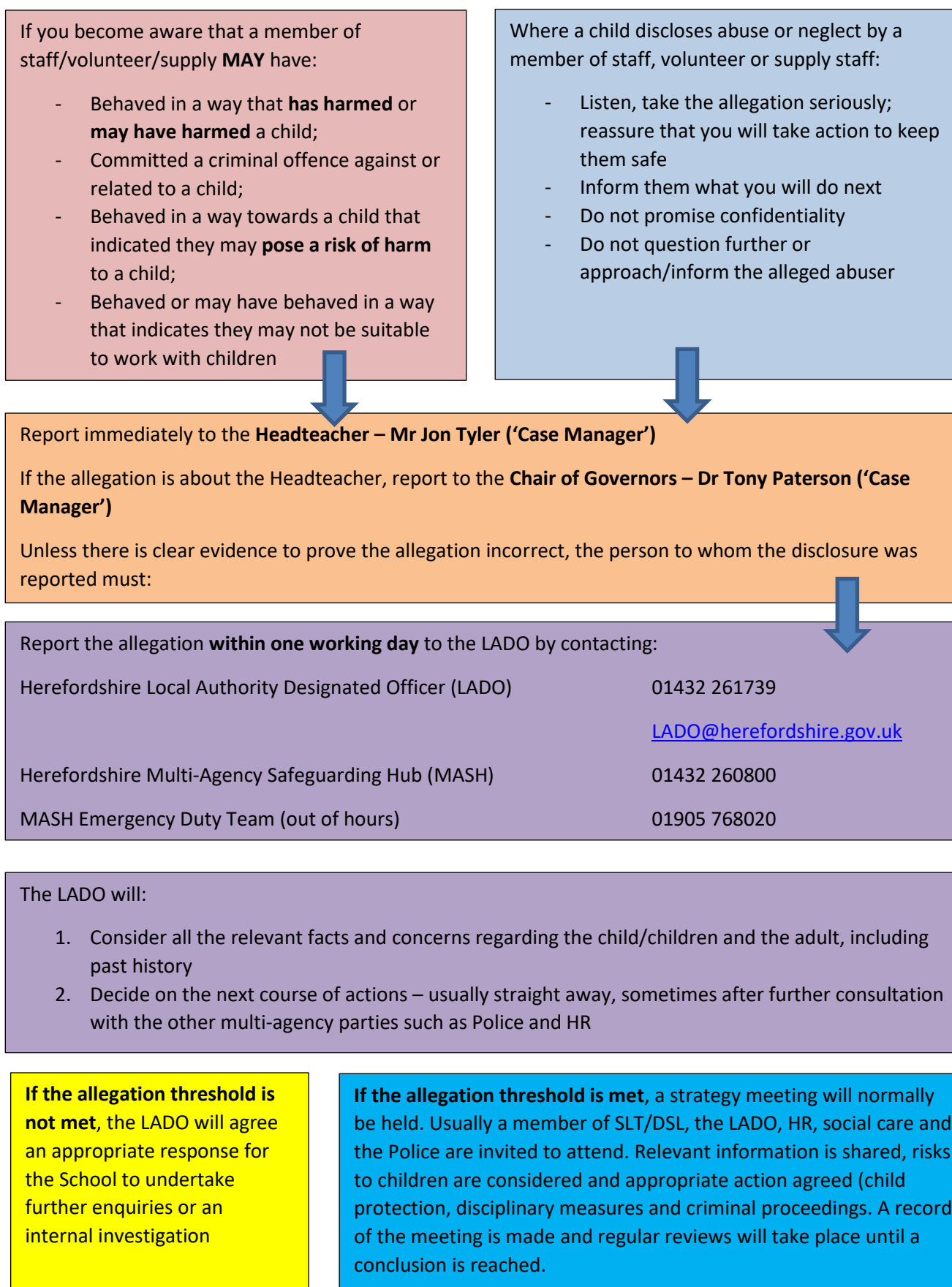
The school will provide reports as required for these meetings in accordance with the Multi Agency Safeguarding Arrangements (HSCP) interagency procedures. If the school is unable to attend, a written report will be sent. The report will, wherever possible, be shared with parents / carers at least 24 hours prior to the meeting.

Where a child is subject to an inter-agency child protection plan, child in need plan or early help assessment, the school will contribute to the preparation, implementation and review of the plan as appropriate.

If a child is subject to a referral to a multi-panel such as MARAC, MAGPAN or CHANNEL the school will contribute to such the school will contribute to such arrangements.



## Appendix 3 – Flowchart - Allegations Against Staff





The school will comply with the HSCP procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances.

In all cases where there is an allegation against a member of staff, we will follow the guidance as stated in KCSiE 2021.

**If the allegation meets the harm threshold** as defined in KCSiE 2021 as:

“where it is alleged that anyone working in the school or a college that provides education for children under 18 years of age, including supply teachers, volunteers and contractors has:

- behaved in a way that has harmed a child, or may have harmed a child and/or;
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.” This may have occurred outside of the School and would be a transferable risk (KCSiE 2021, p81)

The School will endeavour to ensure that any allegation of abuse made against a teacher or other member of staff, supply staff or volunteer is dealt with very quickly, in a fair and consistent way that provides effective protection for the child whilst at the same time supporting the subject of the allegation.

### **School’s initial response**

The Headteacher should be informed immediately and becomes the ‘Case Manager’. If the allegation is against the Headteacher, the Chair of Governors should be informed and becomes the Case Manager.

Staff following the procedure for dealing with allegations must apply the procedures objectively and with common sense.

The School will comply with the HSCP procedures for managing allegations and concerns about adults that work or volunteer with children in all circumstances.

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

1. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
2. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
3. Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative

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arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate

5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
6. **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
7. **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
8. **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
9. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate
10. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
11. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
12. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

If a child makes an allegation of physical abuse against an adult that works with children and there are visible bruises, marks or injuries or if a child makes an allegation of sexual abuse against an adult that works with children, Child Protection procedures will be followed and a referral made to the Multi Agency Safeguarding Hub. The LADO will also be informed.

If the actions of the member of staff, are felt likely to fall within the scope of the interagency allegation management procedures 2, the Headteacher will notify the Local Authority Designated Officer (LADO). The LADO will liaise with the Headteacher and advise about action to be taken which will be in accordance with the interagency procedures for managing allegations.

If the Headteacher is uncertain whether the concern or allegation falls within the scope of the allegation management procedures a consultation with the LADO will take place and the advice provided will be acted upon. This consultation and the advice offered will be recorded and held on file.

Where an allegation has been made against the Headteacher, the Chair of the Governing Body takes on the role of liaising with the LADO team in determining the appropriate way forward. For details of this specific procedure see the Section on Allegations against Staff and Volunteers in the procedures of the HSCP.

## **Suspension Procedure**

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

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

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

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

The member of staff is provided with a named contact at the school, who will be contactable and able to liaise between the individual and the school.

## **Confidentiality and Information Sharing**

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

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

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

## **Allegation Outcomes**

We are mindful that there are five possible outcomes to an investigation:

- Substantiated: there is sufficient evidence to prove the allegation;
- Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive or cause harm to the person subject of the allegation;

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- False: there is sufficient evidence to disprove the allegation;
- Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation. The term, therefore, does not imply guilt or innocence; or,
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.

The outcome will determine the course of action taken subsequently, ranging from taking no further action, to dismissal or a decision not to use the person's services in the future. Suspension will not be the default position, however an individual will be suspended if there are no reasonable alternatives.

If the allegation is substantiated and:

- the person is dismissed; resigns, or otherwise ceases to provide his or her services; or
- we, as an employer, cease to use the person's services.

We acknowledge our legal duty to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

### **Criminal investigations and or prosecution**

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

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

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

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

### **Returning to work**

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

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

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

If a report is:

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

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

If an allegation is:

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

### Record Keeping

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

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

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

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

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

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

When providing employer references, we will:

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

### Learning lessons

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

This will include consideration of (as applicable):

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

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

### **Non-recent allegations**

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

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

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

## Appendix 4 – Understanding and Identifying Abuse and Neglect

### Definitions and indicators of abuse

#### Neglect

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

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

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

The following may be indicators of neglect (this is not designed to be used as a checklist):

- constant hunger
- stealing, scavenging and/or hoarding food
- frequent tiredness or listlessness
- frequently dirty or unkempt
- often poorly or inappropriately clad for the weather
- poor school attendance or often late for school
- poor concentration
- affection or attention seeking behaviour
- illnesses or injuries that are left untreated
- failure to achieve developmental milestones, for example growth, weight
- failure to develop intellectually or socially
- responsibility for activity that is not age appropriate such as cooking, ironing, caring for siblings
- the child is regularly not collected or received from school; or
- the child is left at home alone or with inappropriate carer

## **Physical abuse**

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

The following may be indicators of physical abuse (this is not designed to be used as a checklist):

- multiple bruises in clusters, or of uniform shape
- bruises that carry an imprint, such as a hand or a belt
- bite marks
- round burn marks
- multiple burn marks and burns on unusual areas of the body such as the back, shoulders or buttocks
- an injury that is not consistent with the account given
- changing or different accounts of how an injury occurred
- bald patches
- symptoms of drug or alcohol intoxication or poisoning
- unaccountable covering of limbs, even in hot weather
- fear of going home or parents being contacted
- fear of medical help
- fear of changing for PE
- inexplicable fear of adults or over-compliance
- violence or aggression towards others including bullying; or
- isolation from peers

## **Sexual abuse**

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example, rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.



The following may be indicators of sexual abuse (this is not designed to be used as a checklist):

- sexually explicit play or behaviour or age-inappropriate knowledge
- anal or vaginal discharge, soreness or scratching
- reluctance to go home
- inability to concentrate, tiredness
- refusal to communicate
- thrush, persistent complaints of stomach disorders or pains
- eating disorders, for example anorexia nervosa and bulimia
- attention seeking behaviour, self-mutilation, substance abuse
- aggressive behaviour including sexual harassment or molestation
- unusual compliance
- regressive behaviour, enuresis, soiling
- frequent or open masturbation, touching others inappropriately
- depression, withdrawal, isolation from peer group
- reluctance to undress for PE or swimming; or
- bruises or scratches in the genital area

### **Sexual exploitation**

Child Sexual Exploitation (CSE) occurs when a child or young person, or another person, receives “something” (for example food, accommodation, drugs, alcohol, cigarettes, affection, gifts, money) as a result of the child/young person performing sexual activities, or another person performing sexual activities on the child/young person.

The presence of any significant indicator for sexual exploitation should trigger a referral to children’s social care. The significant indicators are:

- having a relationship of concern with a controlling adult or young person (this may involve physical and/or emotional abuse and/or gang activity)
- entering and/or leaving vehicles driven by unknown adult
- possessing unexplained amounts of money, expensive clothes or other items
- frequenting areas known for risky activities
- being groomed or abused via the Internet and mobile technology; and

- having unexplained contact with hotels, taxi companies or fast food outlets

The intelligence reporting form on the HSCP website will be used to share information with Police and children's social care that raises a concern around CSE.

## **Emotional abuse**

Emotional abuse is 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 children 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 participating in normal social interaction. It may also involve seeing or hearing the ill-treatment of another person. It may involve serious bullying (including cyber bullying), 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

The following may be indicators of emotional abuse (this is not designed to be used as a checklist):

- the child consistently describes him/herself in very negative ways – as stupid, naughty, hopeless, ugly
- over-reaction to mistakes
- delayed physical, mental or emotional development
- sudden speech or sensory disorders
- inappropriate emotional responses, fantasies
- behaviours such as rocking, banging head, regression, tics and twitches
- self harming, drug or solvent abuse
- fear of parents being contacted
- running away
- compulsive stealing
- appetite disorders - anorexia nervosa, bulimia; or
- soiling, smearing faeces, enuresis

N.B.: Some situations where children stop communication suddenly (known as “traumatic mutism”) can indicate maltreatment.

## Responses from parents

Research and experience indicates that the following responses from parents may suggest a cause for concern across all four categories:

- delay in seeking treatment that is obviously needed
- unawareness or denial of any injury, pain or loss of function (for example, a fractured limb)
- incompatible explanations offered, several different explanations or the child is said to have acted in a way that is inappropriate to her/his age and development
- reluctance to give information or failure to mention other known relevant injuries
- frequent presentation of minor injuries
- a persistently negative attitude towards the child
- unrealistic expectations or constant complaints about the child
- alcohol misuse or other drug/substance misuse
- parents request removal of the child from home; or
- violence between adults in the household

## Children with disabilities

When working with children with disabilities, practitioners need to be aware those additional vulnerabilities to abuse and neglect such as:

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

Possible indicators of abuse and/or neglect may also include:

- a bruise in a site that might not be of concern on an ambulant child such as the shin, might be of concern on a non-mobile child
- not getting enough help with feeding leading to malnourishment
- poor toileting
- lack of stimulation
- unjustified and/or excessive use of restraint
- rough handling, extreme behaviour modification such as deprivation of medication, food or clothing, disabling wheelchair batteries

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- unwillingness to try to learn a child's means of communication
- ill-fitting equipment. for example callipers, sleep boards, inappropriate splinting
- misappropriation of a child's finances; or
- inappropriate invasive procedures

**The types and indicators of abuse often overlap with each other and staff should be aware that abuse, neglect and safeguarding issues are rarely standalone events.**

### **Child Criminal Exploitation (CCE)**

Some specific forms of CCE can include children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting or pickpocketing. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others. Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence, or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced. They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to. It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Some of the following can be indicators of CCE:

- children who appear with unexplained gifts or new possessions;
- children who associate with other young people involved in exploitation;
- children who suffer from changes in emotional well-being;
- children who misuse drugs and alcohol;
- children who go missing for periods of time or regularly come home late;
- children who regularly miss school or education or do not take part in education

### **County Lines**

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of “deal line”. Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure

compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes.

Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network. We recognise one of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs.

In these circumstances the DSL will consider a referral to the National Referral Mechanism. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral will also be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation, such as CLIMB.

Some potential indicators of county lines involvement and exploitation are listed below, with those at the top of particular concern:

- Persistently going missing from school or home and/or being found out-of-area;
- Unexplained acquisition of money, clothes, or mobile phones;
- Excessive receipt of texts/phone calls and/or having multiple handsets;
- Relationships with controlling/older individuals or groups;
- Leaving home/care without explanation;
- Suspicion of physical assault/unexplained injuries;
- Parental concerns;
- Carrying weapons;
- Significant decline in school results/performance;
- Gang association or isolation from peers or social networks, and
- Self-harm or significant changes in emotional wellbeing

We will consider the [County Lines guidance](#) published by the Home Office.

## **Sexual Violence and Sexual Harassment Between Children**

Sexual violence and sexual harassment is not acceptable and will not be tolerated.

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

We recognise that children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment.

Sexual violence and sexual harassment exist on a continuum and may overlap, they can occur online and offline (both physical and verbal) and are never acceptable. We will ensure that all victims are taken seriously and offered appropriate support.

Members of staff are aware that some groups are potentially more at risk. We know that evidence shows girls, children with SEND and LGBT children are at greater risk.

We will ensure that staff are aware of the following:

- Sexual violence and sexual harassment are not acceptable, will never be tolerated and is not an inevitable part of growing up;
- Sexual violence or sexual harassment must never be tolerated or dismissed as “banter”, “part of growing up”, “just having a laugh” or “boys being boys”, and
- Challenging behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.

## **Sexual Violence**

Lucton staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. We refer to sexual violence as sexual offences under the Sexual Offences Act 2003 as described below:

- Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
- Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
- Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.

We believe that consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g. to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

## **Sexual Harassment**

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment.

Whilst not intended to be an exhaustive list, sexual harassment can include:

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- Sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names;
- Sexual “jokes” or taunting;
- Physical behaviour, such as: deliberately brushing against someone, interfering with someone’s clothes and displaying pictures, photos or drawings of a sexual nature, and
- Online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. This may include:
  - Non-consensual sharing of sexual images and videos;
  - Sexualised online bullying;
  - Unwanted sexual comments and messages, including, on social media;
  - Sexual exploitation; coercion and threats; and
  - Upskirting.

### **Upskirting**

The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019.

We recognise ‘Upskirting’ is where someone takes a picture under a person’s clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

Please refer to our policy and procedures with regard to peer-on-peer abuse.

### **Youth produced sexual imagery**

Youth produced sexual imagery is the sending or posting of sexually suggestive images, including nude or semi-nude photographs via mobile devices or the internet by under 18s.

This includes:

- a person under 18 creating a sexual image of themselves and sharing it with another person under 18
- a person under 18 sharing an image of another person under 18 with another person under 18 or an adult
- a person under 18 in possession of sexual imagery created by another person under 18

It does not include:

- a person under 18 sharing adult pornography
- a person under 18 sharing sexual texts without sexual imagery
- adults sharing sexual imagery of under 18s. (This is child sexual abuse and must always be reported to police.)

## The Law

*“Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of yourself if you’re under 18.”*

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation.
- indecent images may also include overtly sexual images of young people in their underwear

These laws were not created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. We believe young people need education, support and safeguarding not criminalisation.

The National Police Chief’s Council has made clear that incidents of youth produced sexual imagery should be treated primarily as a safeguarding issue. However, the Police may need to be involved in cases to ensure that there is a thorough investigation including collection of evidence. If a young person has shared imagery consensually, such as when in a romantic relationship or as a joke, and there is no intended malice it is usually appropriate for the school to manage the incident directly. In contrast, any incidents with aggravating factors, for example, a young person sharing someone else’s imagery without consent and with malicious intent, should generally be referred to police and/or children’s social care.

If you have any doubts about whether to involve other agencies, you should make a referral to the police

## Assessing the risks

The circumstances of incidents can vary widely. If at the initial review stage a decision has been made not to refer to police and/or children’s social care, the DSL should conduct a further review (including an interview with the young people involved) to establish the facts and assess the risks.

When assessing the risks the following should be considered:

- why was the imagery shared?
- was the young person coerced or put under pressure to produce the imagery?
- who has shared the imagery?
- where has the imagery been shared?
- was it shared and received with the knowledge of the pupil in the imagery?
- are there any adults involved in the sharing of the imagery?



- what is the impact on the young people involved?
- do the young people involved have additional vulnerabilities?
- does the young person understand consent?
- has the young person taken part in this kind of activity before?

#### Informing parents (or carers)

Parents (or carers) should be informed and involved in the process at an early stage unless informing the parent will put the young person at risk of harm. Any decision not to inform the parents would generally be made in conjunction with other services such as children's social care and/or the police, who would take the lead in deciding when the parents should be informed.

DSLs may work with the young people involved to decide on the best approach for informing parents. In some cases DSLs may work to support the young people to inform their parents themselves.

#### Searching devices, viewing and deleting imagery

##### Viewing the imagery

Adults should not view youth produced sexual imagery unless there is good and clear reason to do so. Wherever possible, responses to incidents should be based on what DSLs have been told about the content of the imagery.

If a decision is made to view imagery, the DSL would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies (i.e. it is not possible to establish the facts from the young people involved)
- is necessary to report the image to a website, app or suitable reporting agency to have it taken down, or to support the young person or parent in making a report
- is unavoidable because a young person has presented an image directly to a staff member or the imagery has been found on a school device or network

If it is necessary to view the imagery then the DSL should:

- never copy, print or share the imagery; this is illegal
- discuss the decision with the Headteacher
- ensure viewing is undertaken by the DSL or another member of the safeguarding team with delegated authority from the Headteacher
- ensure viewing takes place with another member of staff present in the room, ideally the Headteacher or a member of the senior leadership team.
- This staff member does not need to view the images
- wherever possible ensure viewing takes place on school or college premises, ideally in the Headteacher or a member of the senior leadership team's office

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- wherever possible ensure that images are viewed by a staff member of the same sex as the young person in the imagery
- record the viewing of the imagery in the school's safeguarding records including who was present, why the image was viewed and any subsequent actions and ensure the safeguarding recording procedures for the school are followed

The Education Act 2011 amended the power in the Education Act 1996 to provide that when an electronic device, such as a mobile phone, has been seized, a teacher who has been formally authorised by the Headteacher can examine data or files, and delete these, where there is good reason to do so. This power applies to all schools and there is no need to have parental consent to search through a young person's mobile phone.

If during a search a teacher finds material which concerns them and they reasonably suspect the material has been, or could be, used to cause harm or commit an offence, they can decide whether they should delete the material or retain it as evidence of a criminal offence or a breach of school discipline. They can also decide whether the material is of such seriousness that the police need to be involved.

Further details on searching, deleting and confiscating devices can be found in the our policy and the [DfE Searching, Screening and Confiscation advice](#).

### **Honour Based Violence**

'Honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices, such as breast ironing.

Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators.

We are aware of this dynamic and will consider additional risk factors when deciding what form of safeguarding action to take. We see all forms of HBA as abuse (regardless of the motivation) and will handle and escalate as such. We will ensure the school community are alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the DSL (or DDP). As appropriate, they will activate the local safeguarding procedures by contacting HSCP for the child and if necessary the police.

### **Forced Marriage**

Lucton understands that forcing a person into a marriage is a crime in England and Wales. We know that a forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example).

Nevertheless, some communities use religion and culture as a way to coerce a person into marriage.

We play an important role in safeguarding children from forced marriage. We will follow the Forced Marriage Unit published statutory guidance and Multi-agency guidelines. Our staff can contact the Forced Marriage Unit if they need advice or information, contact: 020 7008 0151 or email [fmnu@fco.gov.uk](mailto:fmnu@fco.gov.uk)

## **Female genital mutilation (FGM)**

Female genital mutilation (FGM) is a procedure where the female genitals are deliberately cut, injured or changed, but where there's no medical reason for this to be done.

It's also known as "female circumcision" or "cutting", and by other terms such as sunna, gudniin, halalays, tahur, megrez and khitan, among others.

FGM is usually carried out on young girls between infancy and the age of 15, most commonly before puberty starts. It is illegal in the UK and is a form of child abuse. It is very painful and can seriously harm the health of women and girls. It can also cause long-term problems with sex, childbirth and mental health.

## **Effects of FGM**

There are no health benefits to FGM and it can cause serious harm, including:

- constant pain
- pain and/or difficulty having sex
- repeated infections, which can lead to infertility
- bleeding, cysts and abscesses
- problems passing urine or incontinence
- depression, flashbacks and self-harm
- problems during labour and childbirth, which can be life-threatening for mother and baby

Some girls die from blood loss or infection as a direct result of the procedure.

## **Why FGM is carried out?**

FGM is carried out for various cultural, religious and social reasons within families and communities in the mistaken belief that it will benefit the girl in some way, for example, as a preparation for marriage or to preserve her virginity.

However, there are no acceptable reasons that justify FGM. It is a harmful practice that is not required by any religion and there are no religious texts that say it should be done. There are no health benefits of FGM. FGM usually happens to girls whose mothers, grandmothers or extended female family members have had FGM themselves or if their father comes from a community where it is carried out.

## **Where FGM is carried out?**

Girls are sometimes taken abroad for FGM, but they may not be aware that this is the reason for their travel. Girls are more at risk of FGM being carried out during the summer holidays as this allows more time for them to "heal" before they return to school.

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Communities that perform FGM are found in many parts of Africa, the Middle East and Asia. Girls who were born in the UK or are resident here but whose families originate from an FGM practising community are at greater risk of FGM.

Communities at particular risk of FGM in the UK originate from:

Egypt	Yemen	Eritrea	Sudan
Ethiopia	Somalia	Gambia	Sierra Leone
Guinea	Nigeria	Indonesia	Mali
Ivory Coast	Malaysia	Kenya	Liberia

### **FGM is illegal in the UK.**

It is an offence to:

- perform FGM (including taking a child abroad for FGM)
- help a girl perform FGM on herself in or outside the UK
- help anyone perform FGM in the UK
- help anyone perform FGM outside the UK on a UK national or resident
- fail to protect a girl for whom you are responsible from FGM

Anyone who performs FGM can face up to 14 years in prison. Anyone found guilty of failing to protect a girl from FGM can face up to seven years in prison.

Female Genital Mutilation Act 2003 (section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers (along with social workers and healthcare professionals) to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18.

### **Possible signs and indicators of FGM**

A girl or woman who has had FGM may:

- have difficulty walking, sitting or standing
- spend longer than normal in the bathroom or toilet
- have unusual behaviour after an absence from school or college
- be particularly reluctant to undergo normal medical examinations
- ask for help, but may not be explicit about the problem due to embarrassment or fear.

These signs that MAY indicate a girl is at risk of FGM:

- Parents requesting additional periods of leave around school holiday times
- If the girl comes from a country with a high prevalence of FGM
- Mother and siblings have undergone FGM
- Child may indicate that they are going for a special event

Further information can be obtained [for FGM guidance.](#):

## Radicalisation and the PREVENT Agenda

We understand children are vulnerable to extremist ideology and radicalisation. Similar to our role in protecting children from other forms of harms and abuse, we will also protect children from this risk as part of our safeguarding approach.

- Extremism is the vocal or active opposition to our fundamental values, including democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.
- Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.
- Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

We accept that there is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences, such as family and friends may contribute to a child's vulnerability.

Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

We understand where possible it is our role to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, through appropriate training staff will be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection.

Indicators of vulnerability include:

- identity crisis – the child is distanced from their cultural / religious heritage and experiences discomfort about their place in society
- personal crisis – the child may be experiencing family tensions; a sense of isolation; and low self-esteem; they may have dissociated from their existing friendship group and become involved with a new and different group of friends; they may be searching for answers to questions about identity, faith and belonging
- personal circumstances – migration; local community tensions; and events affecting the child's country or region of origin may contribute to a sense of grievance that is triggered by personal experience of racism or discrimination or aspects of Government policy;
- unmet aspirations – the child may have perceptions of injustice; a feeling of failure; rejection of civic life
- experiences of criminality – which may include involvement with criminal groups, imprisonment, and poor resettlement / reintegration
- Special Educational Need – children may experience difficulties with social interaction, empathy with others, understanding the consequences of their actions and awareness of the motivations of others

However, this list is not exhaustive, nor does it mean that all young people experiencing the above are at risk of radicalisation for the purposes of violent extremism.

More critical risk factors could include:

- being in contact with extremist recruiters
- accessing violent extremist websites, especially those with a social networking element
- possessing or accessing violent extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining or seeking to join extremist organisations; and
- significant changes to appearance and / or behaviour
- experiencing a high level of social isolation resulting in issues of identity crisis and / or personal crisis

MUU ideology (Mixed, Unclear, Unstable) is a category within the Prevent system, introduced in 2017/18 and designed to distinguish from those cases in which an individual's ideology is obvious, well-embedded and appears to be the primary factor drawing them towards TACT offences. It describes what appears to be an increasingly common phenomenon where individuals do not have a well-defined or well-understood ideological motivation. These individuals often seem drawn towards acts of extremism, extremist or terrorist groups or causes, or terrorist violence, as a means of providing them with a 'solution' to other problems in their lives. They commonly present with multiple and complex vulnerabilities.

- **Mixed:** individuals who show interest in several (sometimes disparate) ideologies simultaneously. For example, a joint interest in right-wing extremism and involuntary celibate ("incel") content or Islamist extremism and white supremacy.
- **Unstable:** individuals who initially appear to adhere solely to one ideology but then switch or transition to another.
- **Unclear:** individuals whose ideological influences are less coherent and not easily identifiable. This can include individuals motivated by a hatred of a 'perceived other' without relating to prominent, well-known forms of extremism. This includes but is not limited to those who appear fixated with mass violence (such as school shootings) and incels, whose intolerance is predominantly directed at women.

Individuals referred for MUU display a variety of characteristics, including: an interest in multiple extremist ideologies in parallel (e.g. Islamic extremism and white supremacy); switching from one ideology to another over time; targeting a 'perceived other' of some kind without specifically identifying with a particular cause; obsession with massacre or mass violence without a particular target group; and vulnerability to being drawn into terrorism out of a desire for belonging or elevated social state.

Staff will use their judgement in identifying children who might be at risk of radicalisation and act proportionately which must include reporting their concerns to the DSL (or DDSL) who will consider making a Prevent referral.

## The Prevent duty

We are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. We see The Prevent duty as part of our wider safeguarding obligation. Our DSL and deputies and other senior leaders are familiar with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76.

We will follow the published advice for schools on the Prevent duty. We aim to ensure that all members of staff have completed training on the Prevent duty.

## **Channel**

We recognise Channel as a confidential programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism.

We will refer to the relevant Channel programme if we are concerned that an individual might be vulnerable to radicalisation. We will always seek the individual's consent to do so. [We will follow the Channel guidance.](#)

If we feel children are being abused through extremism or being radicalised, we will consult directly with HSCP or the local social care team for the child and the police PREVENT team, and seek advice. This is done with a [PREVENT referral form](#).

The PREVENT referral will be sent to the Channel Police Practitioner (CPP) at the Counter Terrorism Unit. As with all referrals this referral will be dealt with appropriately with professionals.

Our policy also recognises that the local police can be contacted in imminent circumstances or the national Police Prevent line on 0800 011 3764 and at [Prevent@westmercia.pnn.police.uk](mailto:Prevent@westmercia.pnn.police.uk)

## **Fabricated and Induced Illness**

“The fabrication or induction of illness in children is a relatively rare form of child abuse. Where concerns exist about fabricated or induced illness: it requires professionals to work together, evaluating all the available evidence, in order to reach an understanding of the reasons for the child's signs and symptoms of illness. At all times professionals need to keep an open mind to ensure that they have not missed a vital piece of information”.

This supplementary guidance to ‘[Working Together to Safeguard Children](#)’ will be adopted by this establishment and we will adhere to our duties set out in ‘[Working Together](#)’.

## **Suicide Intervention**

This school accepts and understands that thoughts of suicide are common and the leading cause of death in young people. As such, suicide intervention is our business too. This school wants to work with our pupils and work in partnership to support anyone in our school community that may have thoughts of suicide.

This school will follow the school's Suicide Intervention Policy (contained in Mental Health Policy and Guidelines) to assist wherever we can in making those in our care as safe as is possible.

We will also make staff aware of the following useful link in raising awareness of the subject:  
<http://zerosuicidealliance.com/>



This school recognises that suicide bereavement has been described as ‘grief with the volume turned up’. The effects on families, communities and society as a whole are devastating and tragic.

Lucton School will support in any way we can.

### **Drug and Substance Misuse**

Where issues come to the attention of the school in relation to drugs and substance misuse we will follow the non statutory advice contained within ‘[DfE and ACPO drug advice for schools](#)’ (September 2012). This document clearly sets out issues around broader behaviour and pastoral support, as well as managing drugs and drug related incidents within school. The document produced by the Department of Education and the Association of Chief Police Officers clearly sets out the role of schools, their powers and what schools can do. Coupled with this preventative and supportive approach this will sit hand in hand with our statutory functions of child protection and the alerting to established referral procedures and the law of the land.

### **Private Fostering, Homelessness and Homestay Arrangements**

A private fostering arrangement occurs when someone other than a parent or close relative cares for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16, or under the age of 18 if the child is disabled. This extends to children who are within homestay arrangements.

Most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases where so called ‘sofa surfing’ has been evident. It is important that schools are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

This school also recognise that children whether through family difficulties or through their own choice could be at risk of becoming homeless. This school recognises that we will refer and consult with relevant agencies to support any families/child or children in this situation.

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children’s Social Care as soon as possible. When the school becomes aware of a private fostering arrangement for a pupil that has not been notified to Children’s Social Care, the school will encourage parents and private foster carers to notify Children’s Social Care and will share information to Children’s Social Care as appropriate. In the case of Homestay arrangements we will ensure that our school falls within the duties as set out in KCSiE 2021. For avoidance of doubt these include any arrangements at home or abroad.

The school does not use, and has never used, Homestays.



## Appendix 5 – Role of the Designated Safeguarding Lead (DSL) – Full description

**The Designated Safeguarding Lead, Sharron Goode**, is a member of the Senior Leadership Team and takes lead responsibility for coordinating all child protection activity within the school. They will provide support to staff members to carry out their safeguarding duties and will liaise closely with other services such as the early help hub, children's social care, health, police etc. This person has lead responsibility and holds the management oversight for safeguarding and child protection.

**The Designated Safeguarding Lead is supported by the following Deputy Designated Safeguarding Lead/s: Mrs Elmien Niblett, Mr David Bicker-Caarten and Mrs Irena Powell**

The Deputy Designated Safeguarding Leads are trained to the same level as the Designated Safeguarding Lead and will undertake this role operationally with direct oversight and management from the Designated Safeguarding Lead who maintains lead responsibility.

When the School has concerns about a child, the Designated Safeguarding Lead or Deputy will decide what steps should be taken in accordance with the Right Help Right Time document and initiate a response accordingly. This may include providing a single agency early help response, undertaking effective support or Graded Care Profile 2 or referral to Children's Social Care for a statutory social work assessment. The Headteacher will be kept apprised of cases as appropriate.

- DSL will refer to the Model Setting Concern Process if a concern becomes apparent regarding a child.
- the Designated Safeguarding Lead will support staff who make referrals to the Local Authority Children's Social Care and act as a source of support, advice and expertise for all staff
- the DSL and deputies should liaise with the three safeguarding partners and work with agencies in line with [Working Together to Safeguard Children](#) (2018), [the NSPCC – when to call police](#) should help the DSL understand when they should consider calling the police and what to expect if they do so.
- the Designated Safeguarding Lead will refer cases to the Police where a crime may have been committed. Designated Safeguarding Leads will report appropriate incidents irrespective of whether or not the individual concerned wants to pursue it as there have been increased cases of them not doing it.
- the Designated Safeguarding Lead will seek advice in regard to safeguarding matters related to radicalisation and make referrals to Channel as required
- the Designated Safeguarding Lead will liaise with the Headteacher for allegations to ensure where necessary referrals have been made to the Disclosure and Barring Service when a person is dismissed or resigned due to risk/harm to a child
- the Designated Safeguarding Lead will lead regular case monitoring reviews of vulnerable children. These reviews, together with any actions arising from the review and the rationale for decision-

making will be recorded in case files

- the Designated Safeguarding Lead will ensure safeguarding and child protection information is dealt with in a confidential manner and in accordance with the HSCP's information sharing guidance.
- the Designated Safeguarding Lead understands that compliance is measured via the annual audit return, as per the statutory duty to safeguard children across the local authority
- staff will be informed of relevant details only when the Designated Safeguarding Lead feels their having knowledge of a situation will improve their ability to deal with an individual child and / or family
- a written record will be made of what information has been shared with whom, and when
- the Designated Safeguarding Lead will ensure that safeguarding and child protection records are stored securely in a central place separate from academic records
- individual files will be kept for each child: **the school will not keep family files**
- the Designated Safeguarding Lead will ensure access to safeguarding and child protection records by staff other than by the Designated Safeguarding Lead is restricted, and a written record will be kept of who has had access to them and when
- the Designated Safeguarding Lead will ensure parents are usually (subject to the point below) aware of information held on their children and are kept up to date regarding any concerns or developments by the appropriate members of staff
- general communications with parents will be in line with any home school policies and give due regard to which adults have parental responsibility
- the Designated Safeguarding Lead will ensure that for best practice, case load supervision occurs regularly to identify next steps and escalation, in order to provide the best outcomes for children

**The Designated Safeguarding Lead will not disclose to a parent any information held on a child if this would put the child at risk of significant harm.** In such circumstances, advice will be sought from Children's Social Care.

If a child moves from the school, the Designated Safeguarding Lead will ensure safeguarding records are forwarded on to the Designated Safeguarding Lead at the new school, with due regard to their confidential nature and in line with current government guidance on the transfer of such records. Direct contact between the two schools may be necessary, especially on transfer from primary to secondary schools. The school will record where and to whom the records have been passed and the date.

If sending by post, children's records will be sent by "Special/Recorded Delivery". For audit purposes, a note of all children's records transferred or received should be kept in either paper or electronic format. This will include the child's name, date of birth, where and to whom the records have been sent and the date sent and/or received.

This applies if/when:

- if a child is permanently excluded and moves to a Pupil Referral Unit or Alternative Learning Provision, child protection records will be forwarded on to the relevant organisation

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- if a child is being removed from school roll in order to be home educated, the school will ensure all relevant safeguarding information is shared with the Elective Home Education team and a meeting is held in line with the Herefordshire Elective Home Education policy.
- where a vulnerable young person is moving to a Further Education establishment, consideration should be given to the student's wishes and feelings on their child protection information being passed on in order that the FE establishment can provide appropriate support
- when a Designated Safeguarding Lead resigns their post or no longer has child protection responsibility, there should be a full face-to-face handover/exchange of information with the new post holder. This exchange should be recorded as part of the incoming role holder's induction/performance management.
- in exceptional circumstances when a face-to-face handover is not feasible, the Headteacher will ensure that the new post holder is fully conversant with all procedures and case files

## Appendix 6 – Low level Concern Form

### LUCTON SCHOOL

#### Low Level Concern Form



*To be used when the behavior towards a child is of any concern (a sense of unease or a nagging doubt) but does not meet the harm threshold as detailed in paragraph 338 of KCSiE 2021.*

Child's Name	DOB
Year Group	Date and Time of Incident

#### Child's Details (to be completed by DSL)

Address:	Telephone
Are there other children in the family? If yes, give details	

Nature of the concern/incident. Give details of where and when it took place and who witnessed it. If more space required, please attach a separate sheet to this form.

#### To be completed by DSL:

Who else was informed?	Further action taken?
Signed (DSL)	Number of previous concerns
Further action agreed      Yes / No	Signed (DSL)
Pre CAF Assessment      Yes / No	Reasons



# Who Can I Talk To?



If you have any worries or concerns, we are here to listen and help.

You can talk to your tutor, or **any other member of staff**, or our safeguarding team:



Mrs Goode  
(Safeguarding Lead)



Mrs Niblett  
(Deputy Head Pastoral)



Mr Bicker-Caarten  
(Head of Prep School)



Mrs Powell  
(Nursery Manager)

## Other Help At School

- Use Confide on a computer
- Contact the Listening Service by speaking to a member of staff or by emailing [listening@luctonschool.org](mailto:listening@luctonschool.org)
- Ask Mrs Goode to talk to a Mental Health First Aider
- You can also ask to speak to an outside counsellor or our visiting Chaplain, Reverend Price

## Other Help Outside School

- Childline: [www.childline.org.uk](http://www.childline.org.uk) (0800 1111)
- Kooth Services: [www.kooth.com](http://www.kooth.com) (an online mental wellbeing community for anonymous support)
- Young Minds: [www.youngminds.org.uk](http://www.youngminds.org.uk) (provides advice & support if you're struggling or feeling down)
- No Wrong Door (google 'No Wrong Door HVOSS')



## Appendix 8 – Staff Information Flowcharts for dealing with Disclosures

### What to do if a pupil makes a disclosure to you

#### Listen

- Stay Calm and reassure the pupil
- Listen and ask questions to make sure you understand
- Use **TED** (Tell, Explain, Describe)
- Tell the pupil who you need to pass this on to and why

#### Report

- Record everything you've heard in the pupil's language, keeping only to the facts
- Pass it on to the DSL (Sharron Goode) ASAP
- Or Deputy DSLs (Elmien Niblett, David Bicker-Caarten or Irena Powell)
- If an allegation about a member of staff, go to the Head

#### Whistle blowing

- Follow the policy in the staff shared area and the School website
- You can ring NSPCC Whistleblowing helpline on 0800 028 0285
- You can refer to Herefordshire Safeguarding and Child Protection directly

**If in doubt, speak to the Designated Safeguarding Team**



Mrs Goode  
(Safeguarding Lead)



Mrs Niblett  
(Deputy Head Pastoral)



Mr Bicker-Caarten  
(Head of Prep School)



Mrs Powell  
(Nursery Manager)

**Safeguarding and the welfare of children is everyone's responsibility**

## Appendix 9 – Safeguarding Induction Checklist



### Lucton School safeguarding induction Checklist 2021- 22

F

Name:

Date:

Criteria	comments	Signature
Employment checks complete and the reasons for them		
Keeping children safe in education issued and explained. 2021		
School ethos explained		
Reporting concerns		
Sources of help for staff and students		
<u>Individuals</u> role in safeguarding in school		
Who the Designated Safeguarding Lead is and how to contact them		
Alternatives to reporting in school in an emergency		
Signs of abuse	SMART LOG	
What to do regarding disclosure		
Where to find the school safeguarding policy can be found and read		
What to do if you are concerned about a member of staff's behaviour		
Role of then governing body		
Whistleblowing policy		
Staff code of conduct		
Confidentiality		
E safety		
Channel and Prevent strategies		
Herefordshire support systems		
Sexual harassment and Peer on Peer abuse		
Any other key points pertinent to role		
Well-being scheme		
Role specific guidance		

Induction carried out on:

By:

Signed employee:

S.Goode Sept 2021