



Insights Independent School

Child Protection and Safeguarding Policy

Policy agreed by the School Director and the Senior Leadership Team: January 2026

Next Review Date: January 2027



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Important Contacts

Child Protection and Safeguarding Team

| Role | Name | Contact Information |
|--|-------------------|--|
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| Chair of Advisory Board | Phil Orrell | 0208 840 9099 |
| NSPCC | | 0808 800 5000 |
| Childline | | 0800 11 11 |



1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner.
- All staff are provided with the framework to promote and safeguard the well-being of children and, in so doing, ensure they are aware of and meet their statutory responsibilities.
- Staff are properly trained in recognising and reporting safeguarding issues.

2. Legislation and Statutory Guidance

This policy is based on the following statutory guidance from the Department of Education:

- [Keeping Children Safe In Education 2024](#)
- [Working Together to Safeguard Children 2018](#)
- [Governance Handbook](#)
- Guidance for Safer Working Practices for those Working with Children and Young People in Education Settings

We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- [Part 3 of the schedule to the Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school.
- [The Children Act 1989](#) (and 2004 amendment), which provides a framework for the care and protection of children.
- [Section 5B\(11\) of the Female Genital Mutilation Act 2003](#), as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18.
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM.
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children.
- [Schedule 4 of the Safeguarding Vulnerable Groups Act 2006](#), which defines what regulated activity is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter- Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
- [DfEd Generative AI: product safety expectations](#), these expectations outline the capabilities and features that generative artificial intelligence (AI) products and systems should meet to be considered safe for users in educational settings.



3. Definitions

Safeguarding and promoting the welfare of children means:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and physical health or development.
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes.

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

Abuse is a form of maltreatment of a child and may involve inflicting or failing to act to prevent harm. Appendix B explains the different types of abuse.

Neglect is a form of abuse and 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. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams.

Children includes everyone under the age of 18.

Staff applies to all those working for or on behalf of the school, full time or part time, temporary or permanent in either a paid, or are linked to the school in voluntary capacity such as the Advisory Board members.

Parent refers to birth parents and other adults in a parenting role for example, adoptive parents, stepparents, guardians, carers and foster carers.

DSL refers to Designated Safeguarding Lead.

DST refers to the Designated Safeguarding Team.



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

- The Local Authority (LA).
- A clinical commissioning group for an area within the LA.
- The chief officer of police within the LA area.

The School is located within the London Borough of Ealing and has children from Ealing and several other local authorities within the London area and on the outskirts. We will be aware of the arrangements of each child's local authority as part of the interagency working. We will ensure that we communicate effectively with each child's Local Safeguarding Children's Partnership, be compliant with local protocol and seek access to relevant support for children and their families when required.

Information including contact details for the London Borough of Ealing and other Local Safeguarding Children Partnerships and their arrangements can be found at <http://www.londonscb.gov.uk>

4. Equality Statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10).
- Are young carers.
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalization.
- Are asylum seekers.
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see section 12).
- Are missing from education.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.



5. Roles and Responsibilities

Safeguarding and child protection is everyone's responsibility. This policy applies to all staff, volunteers and advisory board members in the school and is consistent with the procedures of the 3 safeguarding partners. Our policy and procedures also apply to extended school and off-site activities.

5.1 All Staff

All staff will read and understand Part 1 and Annex B of the Department for Education's statutory safeguarding guidance; [Keeping Children Safe in Education](#), and review this guidance at least annually.

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

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



- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe.

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

5.2 The designated safeguarding lead (DSL)

The school has a Dedicated Child Protection & Safeguarding Team. The DSLs take lead responsibility for child protection and wider safeguarding in the school.

During term time, the DSLs will be available during school hours for staff to discuss any safeguarding concerns. If necessary and when outside of school hours during term time, the DSL can be contacted by email at IN-DSL@insightsesc.co.uk

When the DSL is absent, a member of the DSL Team will act as cover.

If the DSL and Designated Team are not available out of term hours, the Executive Director and Senior Leadership Team will act as cover on a temporary rota basis.

DSL responsibilities

The School's DSL Team has responsibility for child protection and safeguarding matters. There are 2 Deputy DSLs in place to ensure that there is appropriate cover for the DSL role at all times across sites.

In addition to the role of all staff, the SLT and the Operational Leads, the DSL will:

- Refer cases to MASH and the police where appropriate in a timely manner avoiding any delay that could place the child at more risk.
- Intimate/personal care where required to comply with a care plan and to be carried out by staff known to the pupil, who are trained and have been DBS & Barred list checked.
- The administering of first aid and/or medication is to be carried out by trained staff in agreement with the SLT responsible for health and medication and parent/carer.
- Attend appropriate training and demonstrate evidence of continuing professional development to carry out the role.
- Ensure every member of staff knows who the DSL and the DST are, have an awareness of the DSL role and know how to contact them.
- Ensure all staff and volunteers understand their responsibilities in being alert to the signs of abuse and responsibility for referring any concerns about a child to the DSL and concerns about an adult to the Executive Director.



- Ensure whole school training occurs regularly, with at least annual updates so that staff and volunteers can fulfil their responsibilities knowledgeably.
- Ensure any members of staff joining the school outside the agreed training schedule receive induction prior to commencement of their duties.
- Have a particular focus on children with social workers and ensure staff know who these children; understand these pupils' academic progress and attainment; maintain a culture of high aspirations for this cohort.
- With the Leadership Team promote educational outcomes and maintain a culture of high aspiration for all pupils.
- With the Leadership Team support teaching staff to identify challenges they may face and the academic support and adjustments that could be made.
- One to One learning sessions and lone working to be risk assessed, pre-arranged and agreed with senior leaders, parents/carers and other relevant professionals.
- Keep records of child protection concerns securely and separately from the main pupil file and use these records to assess the likelihood of risk.
- Ensure that child protection and safeguarding records are transferred accordingly (separate from pupil files) and in a timely fashion when a child transfers school.
- Ensure that, where a pupil transfers school and is subject to a child protection plan, Child In Need plan or is a Looked After Child, their information is passed to the new school immediately and that the child's social worker is informed. Consideration should be given to convening a transition meeting prior to moving, if the case is complex or on-going.
- Liaise with the Executive Director to inform of issues especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations.
- Be aware of the training opportunities and relevant child protection and safeguarding information available provided by external organisations to ensure staff are aware of the latest local guidance.
- Develop, implement and review procedures in the school that enable the identification and reporting of all cases, or suspected cases, of abuse.
- Meet any other expectations set out for DSLs in Keeping children safe in education statutory guidance.
- Arrange home/ door step visit where a pupils attendance is a concern or when there are school closures due to COVID-19 or other emergency or Government directed closures. Procedures outlined in home visiting & lone working, COVID-19 policies will be followed.
- Help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are



experiencing, or have experienced, with teachers and school leadership staff.

- Work alongside and liaise with the Three Safeguarding Partners (Local Authority Chief Executive; Accountable Officer, Clinical Commissioning Group; a Chief Officer of Police) in line with Working together to Safeguard Children and National Police Chiefs Council.
- Ensure any safeguarding deficiencies or weaknesses are remedied without delay.

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

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

The DSL will also keep the Executive Director informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate.

5.3 The Executive Director

Barbara Quartey is the Executive Director of the School and is responsible for the implementation of this policy. The Executive Director will delegate some duties to the DSL, DST, DOS, Operational Leads and line managers to support implementation including ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction.
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect.
- Communicating this policy to parents/carers when their child joins the school and through the school website.
- Ensuring that the DSL & DST have appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- Ensuring that all staff undertake appropriate safeguarding and child protection training and updating the content of the training regularly.
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate. (see appendix 3).

5.4 Advisory Board

The advisory board is a group of volunteers which includes professionals from health, finance and business backgrounds, members of faith groups and parents.

The advisory board supports the school's strategic development and monitors the implementation of this policy.



The advisory board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development.
- With the Executive Director, evaluate and approve this policy after each review, ensuring it complies with the statutory guidance.
- Have an advisory board chairperson to monitor the effectiveness and implementation of this policy in consultation with all members of the board. Feedback on this policy will be provided at the advisory board meetings after making scheduled termly visits to the school which includes participation in learning walks with Senior Leads.

The Advisory board chairperson will act as the 'case manager' in the event that an allegation of abuse is made against the Executive Director, where appropriate (see appendix 3). All members of the advisory board will read Keeping Children Safe in Education in its entirety. Section 15 of this policy has information on how advisory board members are supported to fulfil their role.

6. Confidentiality

The General Data Protection Regulation (GDPR), Data Protection Act 2018 and human rights law are not barriers to justified information sharing; they provide a framework to ensure that personal information about living individuals is shared appropriately.

The Executive Director and the Leadership Team will ensure that staff have due regard to the relevant data protection principles, which allow them to share (and withhold) personal information, as provided for in legislation and the regulations. The DfE Guidance on Information Sharing (July 2018) provides further detail; <https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

All staff must have regard for the following:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information.



- If staff are in any doubt about sharing information, they should speak to the designated safeguarding leads or one of the site's Operational Leads.
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3.

When sharing information staff:

- Will base information sharing decisions on considerations of the safety and well-being of the individual and others who may be affected by their actions.
- Will share information which is necessary, proportionate (shared only with those individuals who need to have it), relevant, adequate, accurate, timely and secure (e.g. secure e-mails, password protected documents).
- Will keep a record of the decision to share or not to share information and the reasons for doing so, including what is being shared, with whom and for what purpose.
- Must be aware that whilst they have duties to keep any information confidential, they also have a professional responsibility to share information with other agencies to safeguard children.

Where matters relating to child protection are considered confidential the Executive Director, DSL, DST and Operational Leads will only disclose the information to other members of staff on a 'need to know' basis.

Matters relating to child protection concerns will be available and shared with the local authority's safeguarding partners and other agencies as required.

7. Recognising abuse and taking action

As a school for children with special educational needs and additional needs, all staff are aware that very young children with disabilities, special educational needs or with language delay may be more likely to communicate concerns with behaviours, gestures and facial expressions rather than words. Additionally, staff will question the cause of knocks and bumps in children who have limited mobility which might include children visiting the site as well as those who are pupils.

Staff, volunteers and advisory board members must follow the procedures set out below in the event of a safeguarding issue.

7.1 If a child is suffering or likely to suffer harm, or is in immediate danger

Make a referral to children's social care and/or the police immediately if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. Anyone can make a referral.

Tell the DSL as soon as possible if you make a referral directly.



Local procedures for making a referral to individual local authorities as per the arrangements put in place by the 3 safeguarding partners can be found at:

- www.londonscb.gov.uk
- <https://www.surreyscp.org.uk/wp-content/uploads/2021/04/Surrey-Safeguarding-Children-Arrangments-2019.pdf> www.surreyscp.org.uk
- **Guidance for reporting child abuse to a local council can also be found at the following link:** <https://www.gov.uk/report-child-abuse-to-local-council>

7.2 If a child makes a disclosure to you

If a child discloses a safeguarding issue to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- Stay calm and do not show that you are shocked or upset.
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner.
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly, and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process.

You should not:

- Ask the child to remove their clothing for you to closely observe any marks/bruises that may have been seen.
- Force the child to say more if they do not want to talk further.

The 7 R's of receiving disclosures are:

Receive:

- Listen to what is being said without showing/expressing shock.
- Accept what is said and take it seriously.
- Make a note of what has been said as soon as practicable.

Reassure:

- Reassure the pupil but only as far as is honest and reliable.
- Don't make promises you may not be able to keep e.g. 'I'll stay with you' or everything will be OK now' or 'I won't tell anyone what you said.'
- Do reassure e.g. 'Thank you for telling me' or 'I'm sorry this has happened'



Respond:

- Respond to the pupil only as far as is necessary for you to establish, whether or not you need to refer this matter, but do not interrogate for more details.
- Do not ask 'leading' questions, e.g. 'did he touch your private parts?' or 'did she hurt you?'.
Such questions may invalidate your evidence (and the child's) in any later prosecution in court.
- Do not ask the child why something has happened.
- Do not criticise the alleged perpetrator; the pupil may care about him/her; a reconciliation may be possible.
- Do not ask the pupil to repeat it to another staff member. Explain what you have to do next and who you have to talk to. Reassure the pupil it will be a senior member of staff.

Report:

- Share concerns with the DSL as soon as possible and record on CPOMS.
- If you are not able to contact the DSL or the DST, and the child is at risk of immediate harm, speak with a Senior Leader or contact the pupil's local authority children's social care directly.

Record:

- If possible, make some brief notes at the time and record them as soon as possible on CPOMS as a safeguarding or child protection concern.
- Record all entries on CPOMS in a professional manner using precise, specific and appropriate language.
- Record the date, time, place, persons present and noticeable non-verbal behaviour, and the words used by the child. If the child uses sexual 'pet' words, record the actual words used rather than translating them into 'proper' words.
- Complete the body map available on CPOMS to indicate the position of any noticeable bruising.
- Record facts and observable things, rather than your interpretations or assumptions.

Remember:

- Support the child; listen, reassure and be available.
- Complete confidentiality is essential. Share your knowledge only appropriate with professional colleagues.
- Get some support for yourself if you need it; all Insights staff have access to the Education Support Partnership which provides mental health and well-being support to education staff 08000 562 561.

Review processes (led by the DSL and involving all staff):

- Has the action taken provided good outcomes for the child?
- Did the procedure work?
- Were any deficiencies or weaknesses identified in the procedure? Have these been remedied?
- Is further training required?



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

Keeping Children Safe in Education explains that FGM comprises “all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs”.

FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.

Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or
- Observes physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and they have no reason to believe that the act was necessary for the girl’s physical or mental health or for purposes connected with labour or birth; must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children’s social care as appropriate.

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

- DSL may need to contact Ealing childrens integrated response service (ECIRS) for further advice; if the pupil is from another borough, DSL may also contact the local authority’s childrens social care duty desk.
- Keep a record of any conversation with child and/or family.
- Police non-emergency number: 101

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

Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil aged 18 or over appears to have been a victim of FGM] must speak to the DSL and follow our local safeguarding procedures.

Support documents and resources for schools are available from the National FGM centre at <http://nationalfgmcentre.org.uk/>

7.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about child’s welfare.

- Where possible, speak to the DSL first to agree a course of action. If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken.



- You can speak to an Operational Lead and/or take advice from the pupil's local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808800 5000.
- Share details of any actions you take with the DSL as soon as practically possible.

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

Early help

If early help is appropriate, the DSL will generally lead on liaising with other agencies and setting up an inter-agency assessment as appropriate. Staff may be required to support the DSL and other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

The details of local procedures for early help referrals can be found on the website of individual local authorities in the 'Children and Families' section. The DSL will support you with this. The links below also provide further information on the early help process.

<https://learning.nspcc.org.uk/safeguarding-child-protection/early-help-early-intervention>

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/410378/Early_help_whose_responsibility.pdf

Referral

If it is appropriate to refer the case to children's social care or the police, the DSL will make the referral or support you to do so.

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must follow local escalation procedures to ensure their concerns have been addressed and that the child's situation improves.

Multi-Agency Safeguarding Hub

If you have further concerns about a child, the DSL can make an on-line referral to the child's local authority MASH. This single point of entry involves a team of practitioners including those from social care, the police and health education. Agreed local authority and statutory thresholds and pathways will be followed to determine which team will provide the most appropriate support.



Thresholds of need

- At level 1 children will be in receipt of universal services and this will be sufficient to meet all their needs.
- At level 2 children may have low levels of need or may be vulnerable to poor outcomes and require extra support and services to help them overcome any difficulties. Services provided at this level will be part of an early help service to prevent any further escalation of need.
- At level 3 children may have a higher or more complex level of need requiring a multi- agency response offering targeted support to improve outcomes. Referrals at this level will meet the statutory threshold for a child in need service and should be referred to children's social care.
- At level 4 children may have acute needs requiring a statutory intervention and may be at risk of significant harm, the threshold for compulsory intervention under child protection procedures. At this level, a referral should be made to children's social care.

7.5 If you have concerns about extremism

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

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

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

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

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

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

7.6 If you have a mental health concern

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

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



Mental health and wellbeing

Staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Staff at Insights are well placed to observe on a daily basis and identify behaviours that might suggest a pupil is experiencing a mental health problem or is at risk of developing one however only appropriately trained professionals should attempt to make a diagnosis of a mental health problem

Conditions created by COVID-19 have increased the likelihood that both stressors and vulnerability will increase for our pupils and their families, therefore all concerns about a pupil's mental and physical health should be brought to the attention of the DSL in line with reporting procedures to ensure that the most appropriate interventions and/or referrals can be considered.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood.

It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If you have a mental health concern about a child that is also a safeguarding concern take immediate action by following the steps in section 7.4.

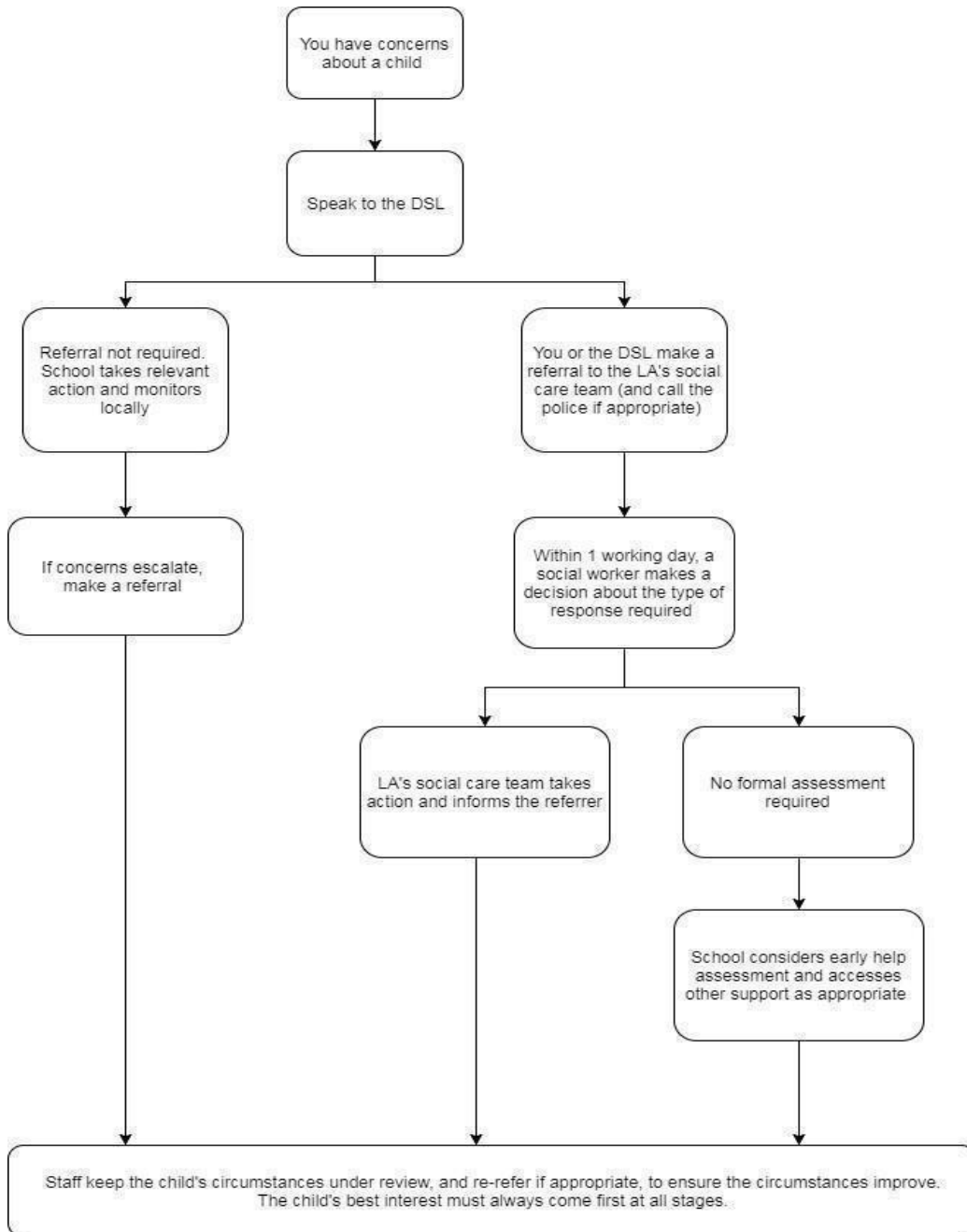
If you have a mental health concern that is not also a safeguarding concern, speak to the DSL as soon as possible to agree a course of action including identifying if the pupil is known to CAMHS.

For more information you can refer to the Department for Education guidance on [mental health and behaviour in schools](#).



Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

(Note – if the DSL is unavailable, this should not delay action. See section 7.4 for what to do)





7.7 Concerns about a staff member, supply teacher, volunteer or contractor

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the Executive Director as soon as possible who will then follow the procedures set out in appendix 3, if appropriate.

If the concerns/allegations are about the Executive Director, speak to the Ealing local authority designated officer (LADO).

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the Executive Director, report it directly to the Ealing local authority designated officer (LADO).

7.8 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”, as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

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

Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy and restorative justice policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns.

This might include where the alleged behaviour:

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

See appendix 4 for more information about child-on-child abuse. Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation on CPOMS under the safeguarding category and tell the DSL, but do not investigate it.
- The DSL will contact the child’s local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will liaise with the Operational Leads to put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed.



- The DSL will contact the child and adolescent mental health services (CAMHS), if appropriate
- Where appropriate, Operational Leads and senior leaders must use professional judgement to arrange discussions with the form tutor about anything that may have taken place within the classroom including any actions taken
- Where neither children's social care nor the police accept the complaint, a thorough school investigation into the matter will take place using the school's internal procedures.
- In such situations where the school considers a safeguarding risk is present, a review of the pupil's individual risk assessment will be completed along with a preventative, supervision plan. The local authority referrer will be kept updated throughout and the plan will be monitored and evaluated with everyone concerned.
- It may be appropriate to exclude the pupil identified as the perpetrator for a fixed period of time in line with the school's behaviour policy, procedures and the child's individual risk assessment, however, prior to this all the relevant information about the incident must be gathered from those who witnessed the matter in order for the Executive Director to consider and authorise an exclusion.
- The victim(s), alleged perpetrator(s) and their parents will all be supported by the school and/or an external service. Support will include pastoral and therapeutic care alongside regular communication with pupils' families. Family and friends will also be called upon to support with improving peer relationships and some restorative justice work may be included.
- We will always seek to understand individual pupil behaviour and will consider what support may be required to help the child understand the behaviour and impact.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent.
- Ensure pupils are able to easily and confidently report abuse using our reporting systems(as described in section 7.10 below).
- Ensure staff reassure victims that they are being taken seriously.

Ensure staff are trained to understand:

- How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports.
- That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”.



- That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report.

For example:

- Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child's behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation.
 - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.
 - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it.
 - That they should speak to the DSL if they have any concerns.
 - Information provided for pupils on how to report concerns about sexual violence, harassment and abuse is made available via; Assemblies, PSHCE, RSE, Social Skills and Displays.

7.9 Sharing of nudes and semi-nudes ('sexting')

The following approach is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders. Your responsibilities when responding to an incident:

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

You must not:

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

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



Initial review meeting

Following a report of an incident, an initial meeting will be held with the appropriate school staff –this may include the staff member who reported the incident, the DST and the site’s Operational Leads. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children’s social care
- If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)
- What further information is required to decide on the best response
- Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images or videos from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents/carers should be involved)
- The DSL will make an immediate referral to police and/or children’s social care if:
 - The incident involves an adult.
 - There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
 - What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person’s developmental stage, or are violent.
 - The imagery involves sexual acts and any pupil in the images or videos is under 13.
 - The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming).

If none of the above apply then the DSL, in consultation with the Executive Director and other members of staff as appropriate, may decide to respond to the incident without involving the police or children’s social care.



The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

If at the initial review stage a decision has been made not to refer to police and/or children's social care, the DSL will conduct a further review to establish the facts and assess the risks. They will arrange to interview the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialing 101. Recording incidents

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

Curriculum coverage

One of the main areas of the curriculum is personal, social, health and economics (PSHCE) and Relationships and Health education.

Pupils will learn about the issues surrounding the sharing of nudes and semi-nudes contents as part of our PSHCE programme, relationships and health education, IT and on-line safety sessions.

Teaching is commensurate with our pupils' individual needs, age and ability and will cover healthy lifestyles which includes the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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



The way we address the sharing of nudes and semi-nudes contents is also shared with our pupils through assemblies, group discussions and presentations so that the processes the school will follow when a concern is raised or in the event of an incident become embedded.



7.10. Reporting systems for our pupils

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

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

To achieve this, we will:

- Make it clear to pupils from their induction period that their concerns will be taken seriously, and that they can safely express their views and give feedback.
- Put systems in place for pupils to confidently report abuse.
- Review existing reporting systems to ensure they are well promoted, easily understood and easily accessible for pupils.
-

How we support pupils to report any concerns and/or allegations

All staff who work at Insights are expected have an understanding of children with special educational needs and additional needs, particularly children and young people who have communication difficulties where awareness of a child's non-verbal language is important to understanding their concern.

When a pupil makes a disclosure it should not be dismissed and the pupil should be able to feel safe. All staff should acknowledge with the pupil that they were right to make the disclosure and provide reassurance to them about where the information will go.

Who pupils can talk to

In the first instance, pupils who have a concern while in school can approach:

- Form tutors
- School therapists
- The Pastoral lead

There are always daily opportunities for pupils to speak about their concerns with all senior leaders who have an 'open door' policy in these circumstances, or any member of staff they are comfortable with during the school day in a safe, designated area (i.e. CCTV cameras, open office/room areas).

Alternatively individual form tutors are available before lessons start (between 08.40 and 09.15) or a non-site therapist will let students and staff know about the 'drop-in' sessions which are available to all pupils on the weekly timetable.

Assemblies, group discussions and presentations provide a platform in supporting pupils to be aware of the reporting systems and processes in terms of who they can report concerns to. Information posters are displayed around the school.



8. Emerging Digital Risks and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and advisory board members.
- Ensure all virtual and online learning follow the procedures outlined in our remote learning policy to keep staff and pupils safe (Home School Agreement virtual learning May 2020).
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones').
- Set clear guidelines for the use of technology, digital platforms (including AI) and mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate.

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying;
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will:

Educate pupils about online safety and emerging digital risks as

part of our curriculum. For example:

- The safe use of social media, the internet and technology.
 - Keeping personal information private.
 - How to recognise unacceptable behaviour online.
 - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim.
 - How to identify misinformation, disinformation and conspiracy theories.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will have access to on-line training modules in these areas, including refresher training at least once each academic year.



- All staff to be aware of the schools policy for the booking and supervision of visiting speakers, training and activity providers, external agencies and contractors.
- Educate parents/carers about online safety via our website, the school newsletter, information from our Pupil and Families service, communications sent directly to them and during parents' evenings. We will also share procedures with them so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
 - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present.
 - Staff will not take pictures or recordings of pupils on their personal phones or cameras.
- Make all pupils, parents/carers, staff, volunteers and advisory board members aware that they are expected to sign an acceptable use agreement regarding the use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

9. Notifying parents or carers

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

Operational Leads will talk to parents or carers about such concerns following consultation with the DSL and will provide timely updates. If we believe that notifying the parents or carers would increase the risk to the child, we will discuss this with the child's local authority children's social care team before doing so.

In the case of allegations of abuse made against other children, we will normally notify individual parents or carers if their child(en) is involved.



10. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

This includes:

Therapy drop-ins. This is incorporated into the weekly timetable and provides allocated time with a therapist, using talking therapy, art/play therapy.

Open door policy. This operates for pupils to have an opportunity to speak to the Executive Director the Operational Leads during the school day about for example an achievement or a concern.

Tutor Programme. A weekly 30 minute session for Year 10 pupils and upwards. The session is based on a theme and includes a short film/presentation, discussion and an activity. It enables pupils with different abilities and interests to engage and explore topics such as: idolising, greed, tolerance, social barriers, racism and discrimination and legacy.

School council. Pupils are elected by their peers and are supported to be aware of their role as an elected school councillor. Children from each tutor group are encouraged to bring their views and ideas to the school council through their class representative.

The Pastoral and therapeutic intervention programme provides activities and opportunities for pupils to learn more holistically to develop their resourcefulness, independence and resilience and receive help to overcome any barriers they face.

11. Pupils with a social worker

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

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

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

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



12. Looked-after and previously looked-after children

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

- Appropriate staff have relevant information about children’s looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The school office has details of children’s social workers and relevant virtual school heads which will be made available to the DSL and Operational Leads.

We will appoint an appropriately trained teacher to take the lead on promoting the educational achievement of looked-after and previously looked-after children in line with statutory guidance.

As part of their role, they will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked- after and previously looked-after children are quickly and effectively responded to.
- Work with virtual school heads to promote the educational achievement of looked-after, previously looked-after children and children in kinship care.

Further details can be found on: <https://www.gov.uk/government/publications/designated-teacher-for-looked-after-children>

13. Complaints and concerns about school safeguarding policies

13.1 Complaints against staff

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

13.2 Other complaints

The school has a complaints policy and as with all complaints we will handle safeguarding-related complaints of other types in a professional and confidential manner – for example, those related to pupils or premises. We take all complaints seriously and we aim to work with all those who raise a concern to resolve the issue through:

Informal complaint process

Parents/carers who wish to raise a concern should firstly phone 020 8840 9099 (option 2) and speak to one of the school office staff or email info@insightsesc.co.uk, leaving a name, contact number and short message. Alternatively, a letter can be attached factually setting out the concern.

During teaching hours (09.15 – 14.30) a message can be left with the school office.

The most appropriate member of staff will be delegated to address the matter with the complainant by the end of the working day or within 24 hours and as soon as practicably possible.



Formal complaint process

- If the matter has not been resolved to the complainant's satisfaction, the next stage is a formal complaint where it is to be put in writing for the attention of the Executive Director.
- The matter will be discussed with the complainant and their support person and the complaint will be fully investigated before the Executive Director decides what steps will be taken as a result.
- The complainant will be informed of the outcome of the investigation by letter.
- Where the complaint is about the Executive Director it is to be made in writing for the attention of the Chair of the advisory board and sent to the school address for their consideration and action.

13.3 Whistle-blowing

We have a standalone whistle-blowing policy available on the website that includes:

- Procedures for raising concerns regarding poor or unsafe practice, or potential failures.
- Procedures for raising other areas of concern, malpractice or wrongdoing and how we will respond to such concerns.
- The protection available to staff who report another member of staff.
- The options available for reporting a concern, including who to approach within the school and externally such as the NSPCC whistleblowing line 0800 028 0285 and help@nspcc.org.uk (national organisations).

14. Record-keeping

We will hold records in line with our records retention schedule.

All safeguarding concerns, complaints, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about how and whether to record something, discuss it with the DSL.

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved
- A note of any action taken, decisions reached and the outcome Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

Safeguarding records relating to individual children will be retained for a reasonable period of time after they have left the school.

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from the main pupil file. Files will be sent by secure email or registered post to the school's DSL.



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

Record-keeping arrangements

Paper-based records are kept in secure storage which is only accessible to the DSL, Deputy DSL, the Director of Pupil Placements & Recruitment and the Executive Director

Electronic based records are stored in folders only accessible to the DSL, Deputy DSL, the Director of Pupil Placements & Recruitment and the Executive Director

We adhere to a data retention policy which is intended to ensure our data is retained in accordance with the Data Protection Act 1998 and all other related legislation.

In addition:

- Section 6 of this policy sets out confidentiality and how the school will share information with other agencies and when this is appropriate in line with local safeguarding procedures.
- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-appointment checks.

15. All staff

All staff members will undertake safeguarding and child protection training during their induction period, including on whistle-blowing procedures and online safety, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.

Have regard to the Teachers' Standards to support the expectation that all teachers:

- Manage behaviour effectively to ensure a good and safe environment.
- Have a clear understanding of the needs of all pupils.

All staff including volunteers will be made aware of the school's expectations regarding safe and professional practice including the requirement to read and adhere to the Staff Code of Conduct and policies covering Acceptable use, On-line safety, Physical touch and Confidentiality.

All staff must confirm they have read and understood the following sections of KCSIE:

- Part one
- Annex B
- Part five



All staff will have access to training on the government's anti-radicalisation strategy, PREVENT, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training. We do not currently have a contractor provided through a PFI.

15.2. The DSL and deputy

The DSL and DST will undertake child protection and safeguarding training at least every 2 years.

In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments).

They will also undertake PREVENT awareness training.

15.3. Advisory board members

All advisory board members receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities. As the chairperson may be required to act as the 'case manager' in the event that an allegation of abuse is made against the Executive Director/Proprietor, they will receive training in managing allegations for this purpose.

15.4. Recruitment – interview panels

We have a standalone safer recruitment policy available on the website.

In line with good practice for all schools, at least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education and will be in line with local safeguarding procedures. See appendix 2 of this policy for more information about our safer recruitment procedures.

15.5. Staff who have contact with pupils and families

Some of our pupils have complex backgrounds, therefore all staff who have contact with children and their families will be provided with support, coaching and training to promote the interests of children and allow for confidential discussions of sensitive issues should such discussions take place.



16. Monitoring arrangements

This policy will be reviewed annually by the Designated Safeguarding Lead. At every review, it will be approved by the Executive Director, Leadership Team and all members of the advisory board.

Monitoring the policy and the review of its procedures will include using the following processes: an Advisory board member and the Chair visit the school termly to monitor this policy in practice; verbal and written feedback from pupils and staff via discussions, pupil surveys and questionnaires; staff questionnaires and verbal feedback; scrutiny of attendance data; oversight of risk assessments; review of pupil behaviour incidents; parent questionnaires; data gathered from CPOMS;

17. Links with other policies

This policy links to the following policies and procedures:

- Behaviour Anti-bullying
- Staff Code of Conduct
- Complaints
- Data Protection
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality Relationships and sex education
- First aid
- Curriculum
- Physical intervention
- Physical contact Privacy notices Acceptable Use
- Home school agreement for virtual learning
- Whistleblowing
- Tackling extremism and radicalization
- Safer recruitment



Appendix A: Types of Abuse

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another.
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)
- Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

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

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

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment).
- Protect a child from physical and emotional harm or danger.
- Ensure adequate supervision (including the use of inadequate care-givers).
- Ensure access to appropriate medical care or treatment.
- It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Appendix B: Safer Recruitment and DBS checks – Policy and Procedures

Recruitment and selection process

The recruitment steps outlined below are based on part 3 of Keeping Children Safe in Education.

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children.
- That safeguarding checks will be undertaken.
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children.
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account.

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity).
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders.

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them.
- Explore all potential concerns.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage.



The information we will ask for includes:

- If they have a criminal history.
- Whether they are included on the barred list.
- Whether they are prohibited from teaching.
- Information about any criminal offences committed in any country in line with the law as applicable in England and Wales.
- Any relevant overseas information.
- Sign a declaration confirming the information they have provided is true.

Seeking references and checking employment history

We will aim to obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references.
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.
- Resolve any concerns before any appointment is confirmed.

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this.
- Explore any potential areas of concern to determine the candidate's suitability to work with children.
- Record all information considered and decisions made.
- Pre-appointment vetting checks

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below.



New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK.

Where available, these will include:

- For all staff, including teaching positions: criminal records checks for overseas applicants
- For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and DST/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

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



These circumstances are when:

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

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

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

Agency and third-party staff

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

Contractors

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

This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.

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

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



Trainee/student teachers

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

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

Volunteers we will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Advisory board members

Advisory board members are volunteers and they will have an enhanced DBS check without barred list information.

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

The proprietor will also have the following checks:

- A section 128 check (to check prohibition on participation in management under section 128 of the Education and Skills Act 2008).
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Staff working in alternative provision settings outside of the school

The school uses alternative service provision outside of the school setting for learning and interactive outdoor activities such as 'Forest School', fishing/angling and farm visits. Where we place a pupil with an external service provider, we will obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

Adults who supervise pupils on work experience

When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.



We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Pupils staying with host families

The school does not operate an overseas exchange/home-based exchange programme for its pupil where the children's care and accommodation is provided by a host family to which they are not related (for example, during a foreign exchange visit).



Appendix C: Allegations of Abuse Made Against Staff

Section 1: Allegations that may meet the harms threshold

This section is based on 'Section 1: Allegations that may meet the harms threshold' in part 4 of Keeping Children Safe in Education. This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

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

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

A 'case manager' will lead any investigation and will be identified at the earliest opportunity. This will be the proprietor/Executive Director, or advice will be sought from the Ealing local authority Designated Officer where the proprietor/Executive Head is the subject of the allegation.

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

Suspension of the accused until the case is resolved

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

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

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

If in doubt, the case manager will seek views from the school's HR consultants and the LADO, as well as the police and children's social care where they have been involved.

Definitions for outcomes of an allegation 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 to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

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

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
- Encourage all parties not to talk to anyone other than those involved in the investigation about the matter on the basis that it could prejudice the final outcome.
- 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
- Whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police).
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies.
- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate.
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.

If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.



If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation.

If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.

Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate.

To manage and minimise the stress caused to individuals by the allegation we will:

- Provide access to counselling or medical advices where appropriate. 'Education Support' offers employee assistance such as individual support and counselling for staff in education www.educationsupport.org.uk Helpline 08000 856 148.
- 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.
- 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).
- 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.

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

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

Additional considerations for supply teachers and all contracted staff

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

We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.



The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary).

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

Timescales

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

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

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

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

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

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



Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports if a report is:

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

Unsubstantiated, unfounded, false or malicious allegations if an allegation is:

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

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered. The case manager will take advice from the LADO, police and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared.
- How to manage speculation, leaks and gossip, including how to make 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.

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case. The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).



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

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

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

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

References

When providing employer references, we will:

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

Learning lessons

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

This will include consideration of (as applicable):

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

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



Non-recent allegations

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

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

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

Section 2: Concerns that do not meet the harm threshold

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

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating or offensive language



Sharing low-level concerns

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

We will create this culture by:

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

We create an open culture within the school by:

- Providing opportunities for all staff to go on training courses related to their subject specialism, specific areas of interest or learning related to the school's vision as a priority.
- Promoting peer support amongst the team by enabling staff to disseminate information at whole school staff meetings/departmental meetings, encouraging staff to learn from each other. For example, on a daily basis and at the end of the school day staff attend the debriefsession and are asked 'what went well?' (www). To gauge what could have been done better staff are asked to consider 'even better if.....' (ebi's).
- Communicating school decisions and events with all staff members.
- Making public, accessible and visible the school's vision, mission, ethos and plans for the entire school, staff, pupils as well as parents (i.e.. Prospectus, website, display board).

Responding to low-level concerns

If the concern is raised via a third party, the Executive Director will arrange for evidence to be collected where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses
- The Executive Director will use the information collected to categorise the type of behaviour and determine any further action, in line with the staff code of conduct.



To respond to low-level concerns effectively we will:

- Starting from the induction period for new staff, encourage staff to share all concerns about adults including those that do not meet the threshold of an allegation;
- At management performance meetings, staff check-out and debrief sessions, create a culture in which all concerns about an adult (including those that do not appear to meet the threshold of an allegation are shared responsibly and with the right person) and are recorded and dealt with appropriately;
- Through training and CPD address staff's understanding of professional boundaries within a school setting for children and young people with special educational needs and additional needs;
- By following reporting procedures ensure that when a concern is raised it is handled robustly, proportionately and sensitively;

Record keeping

All low-level concerns will be recorded in writing. In addition to the details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

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

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

References

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

The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or

The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance.



Appendix D: Specific Safeguarding Issues

This appendix is mostly based on the advice in Keeping Children Safe in Education, in particular Annex B which is mandatory reading for all staff at Insights. Annex B includes information on further issues to be aware of, including child abduction and community safety incidents, children's involvement in the court system, children with family members in prison, county lines, modern slavery and cybercrime.

Children missing from education

A child going missing from education, particularly repeatedly, can be a warning sign of a range of safeguarding issues. This might include abuse or neglect, such as sexual abuse or exploitation or child criminal exploitation, or issues such as mental health problems, substance abuse, radicalisation, FGM or forced marriage.

There are many circumstances where a child may become missing from education, but some children are particularly at risk. These include children who:

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

If a staff member suspects that a child is suffering from harm or neglect, we will follow local child protection procedures, including with respect to making reasonable enquiries such as follow-up calls to parents where there has been no contact from a parent at the close of the morning register where a child has not arrived for school.

The allocated social worker of a child who is absent from school, regardless of notification/contact from the parent /carer, will be informed by the school office of the absence and the reason provided by the parent/carers for the absence which is also recorded on SIMS.



Where there is a pattern of invalid reasons for the child's absence or significant absences from school (i.e. more than 5 days), the DSL will take advice from the child's local authority Education Welfare Officer and inform the local authority referrer.

Where a new pupils does not attend school on the expected start date, the school office will attempt to call the parent/carer for the reason and will inform the local authority referrer.

We will make an immediate referral to the local authority children's social care team, and the police, if the child is suffering or likely to suffer from harm, or in immediate danger.

Child Criminal Exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.



The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Domestic abuse/violence

Children can witness and be adversely affected by domestic abuse and/or violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day. This is the procedure where police forces are part of Operation Encompass a national operation that directly connects the police with schools and early years settings to secure better outcomes for children. Our DSL has completed the on line training (Key Adult Briefing) and will provide assistance according to the child's needs and update records about their circumstances.



An addendum to the policy will be added as soon as government legislation & guidance update is enforced i.e. detailing the new requirements in regards to Domestic abuse and violence, coercive behaviours, risk assessments tools for police and support agencies, prevention of abuse, identification and regulation of offenders.

The National Domestic Abuse 24 hour Helpline can be contacted on: 0808 2000 247, <http://www.nhs.uk/live-well/healthy-body/getting-help-for-domestic-violence>

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.

The DSL and DST will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

So-called 'honour-based' abuse (including FGM and forced marriage).

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.

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

All forms of HBA are abuse and will be handled and escalated as such. All staff will be alert to the possibility of a child being at risk of HBA or already having suffered it. If staff have a concern, they will speak to the DSL, who will activate local safeguarding procedures.

FGM

The DSL will make sure that staff have access to appropriate training to equip them to be alert to children affected by FGM or at risk of FGM.

Section 7.3 of this policy sets out the procedures to be followed if a staff member discovers that an act of FGM appears to have been carried out or suspects that a pupil is at risk of FGM.

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place.
- A mother/family member disclosing that FGM has been carried out.
- A family/pupil already being known to social services in relation to other safeguarding issues.



A girl:

- Having difficulty walking, sitting or standing, or looking uncomfortable.
- Finding it hard to sit still for long periods of time (where this was not a problem previously).
- Spending longer than normal in the bathroom or toilet due to difficulties urinating.
- Having frequent urinary, menstrual or stomach problems.
- Avoiding physical exercise or missing PE.
- Being repeatedly absent from school, or absent for a prolonged period.
- Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour.
- Being reluctant to undergo any medical examinations.
- Asking for help, but not being explicit about the problem.
- Talking about pain or discomfort between her legs.

Potential signs that a pupil may be at risk of FGM include:

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider).
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society.
- Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman".
- Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period.
- Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM.
- Talking about FGM in conversation – for example, a girl may tell other children about it(although it is important to take into account the context of the discussion).
- Being unexpectedly absent from school.
- Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication.



The above indicators and risk factors are not intended to be exhaustive.

Forced marriage

Forcing a person into marriage is a crime. 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.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the 'one chance' rule, i.e. we may only have one chance to speak to the potential victim and only one chance to save them.

If a member of staff suspects that a pupil is being forced into marriage, they will speak to the pupil about their concerns in a secure and private place. They will then report this to the DSL.

The DSL will:

- Speak to the pupil about the concerns in a secure and private place.
- Activate the local safeguarding procedures and refer the case to the local authority's designated officer.
- Seek advice from the Forced Marriage Unit on 020 7008 0151 or <mailto:fm@fco.gov.uk>
- Refer the pupil to an education welfare officer, pastoral tutor, learning mentor, or school counsellor, as appropriate.

Preventing radicalisation

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

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

Terrorism is an action that:

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

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

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



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

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

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

Staff will be alert to changes in pupils' behaviour.

The government website Educate Against Hate and charity NSPCC say that signs that a pupil is being radicalised can include:

- Refusal to engage with, or becoming abusive to, peers who are different from themselves.
- Becoming susceptible to conspiracy theories and feelings of persecution.
- Changes in friendship groups and appearance.
- Rejecting activities they used to enjoy.
- Converting to a new religion.
- Isolating themselves from family and friends.
- Talking as if from a scripted speech.
- An unwillingness or inability to discuss their views.
- A sudden disrespectful attitude towards others.
- Increased levels of anger.
- Increased secretiveness, especially around internet use.
- Expressions of sympathy for extremist ideologies and groups, or justification of their actions.
- Accessing extremist material online, including on Facebook or Twitter.
- Possessing extremist literature.
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations.

Children who are at risk of radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour, staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should always take action if they are worried.

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including the curriculum policy, behaviour policy, tackling radicalisation and extremism policy and online/e-safety policy.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.



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

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying).
- Abuse in intimate personal relationships between peers.
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence).
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery).
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Sexual violence and sexual harassment between children in schools Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

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 and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe.



A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours.
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them.
- Recognizing that abuse may be taking place that is unreported and to be vigilant at all times.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school.
- Change in friendships or relationships with older individuals or groups.
- Significant decline in performance.
- Signs of self-harm or a significant change in wellbeing.
- Signs of assault or unexplained injuries.
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above)).

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.



Checking the identity and suitability of visitors

Advance notice of external professionals, contractors, agency staff, new staff expected to start work, staff interviewees, pupil interviewees and their parents and pupils arriving for their first day will be provided by Operational Leads and/or the site maintenance manager. This information will be shared with the senior leaders' team, the PA to the Executive Director.

All visitors:

- Should be ready to produce photo identification when requested.
- If they are unknown to the setting, the school office will check their credentials and reason for visiting before allowing them to enter the setting.
- Will be required to verify their identity to the satisfaction of school office staff based at the site's main entrance and reception desk.
- Who are professionals sent from an organisation such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out.
- Who are visiting for a professional purpose, such as educational psychologists and social workers, will be asked to show photo ID.
- Must sign-in electronically on the visitors' register, confirm they have read the fire, health & safety procedures; a photo ID badge will be generated after sign-in which must be visible at all times while on site.
- Will be given the 'Safeguarding Advice for Visitors' leaflet by a member of the administration team which must be read.
- Are expected to observe the school's safeguarding and health and safety procedures at all times.
- Must not be allowed to walk unaccompanied around the site.

All other visitors, including visiting speakers, will also be accompanied by a member of staff whilst on site. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Non-collection of children

The majority of the children at the school are dropped off and collected by a local authority transport team, however if a child is not collected at the end of the school day, the school office will:

Contact the LA transport if this is a service the child uses and where transport has been delayed, we will keep the child in school with an allocated staff member until the child is collected.

The school office will contact the parent to give updates and the estimated time of arrival home.



For children whose parents have not collected them at the end of the school day, an Operational Lead will:

Contact the parent on the phone numbers provided to the school; If the Operational Lead is unable to speak to the parent, they will:

- Contact the next of kin/emergency number provided to the school.
- Check with the school office if the child has an allocated social worker or family worker.

If a child has an allocated social worker, the DSL in consultation with the Operational Lead will:

- Contact the allocated social worker or the Emergency Duty Team to arrange for the child to be collected by a local authority social worker.

Recording information

All information, actions and decisions will be collated by the DSL and recorded on CPOMS.

Missing child

Our procedures are designed to ensure that a missing child is found and returned to safe, effective supervision as soon as possible:

- Registration is taken in the morning from 08.20 as children arrive on the premises.
- Names of all students who have not arrived by 09:15 will be passed to the Operational Leads by 09:15 and before the first lesson begins.
- By 09:15 all students should be in their first lesson and the class register will have been taken.
- Lunch takes place 1 – 1:30pm.
- All students below Year 10 are required to eat lunch on site.
- All students who are Year 10 and above, can leave the premises for lunch where we have parental consent.
- At 1pm a class register is taken.

If a child goes missing:

- All available staff will immediately check toilets, shared areas, rooms and playground areas to ensure the child is not hiding or locked in anywhere.

One member of staff to immediately request the school office to:

- check the SIMS register/visitors' log as soon as the child is reported missing to see whether the child has been signed out for an external appointment or has an internal appointment with a visiting professional;
- contact the parent.



- Staff will ensure that all other children are kept safe and closely supervised throughout incident should it be during the school day.

If, after 10 minutes the child is not found, school office staff will:

- Contact parents/carers with parental responsibility.

Any contact with the police will be made by the DSL or an Operational Lead who will:

- Contact and liaise with the police, providing as much information as possible, including;
 - Name/DOB/any alias/nickname
 - Current addresses
 - Phone numbers
 - Family Details (Names/Addresses etc.)
 - Contact details for any key worker/Social Worker
 - Details of any vulnerability (i.e. learning needs/Social Emotional & Mental Health needs/physical injury, impairment, illness/medication)
 - Details of any current concern/issue for the child
 - Circumstances of disappearance
 - The last sighting of the child
 - What steps have been taken, when and by whom

We will inform the police of any changes or updates to this information, particularly where this may alter the level of risk.

When the child is found:

If they are found within 10 minutes the Operational Lead will:

- Ask the school office to update the parent/carers; we recognise that during the time a child is missing, however briefly, all involved, parents/carers and others suffer great fear, guilt and distress and the DSL, DST and Operational Leads, will arrange to provide reassurance from the most appropriate staff member.
- Speak with the child to check how they are, reassure them where necessary and establish where they were and what happened;

If, after the police have been contacted by the DSL or Operational Lead and the child is found, the police will contact the parents/carers to agree what the next steps are; they will also contact the school with an update and to arrange a welfare visit at the school the next day if they have been made aware that the child returned home and did not come back to school on the day they were reported missing.

If a child goes missing while on a school trip:

- A head count will be made by the group leader
- One member of staff will immediately inform the venue's information desk/security/reception providing a description of the child and their needs
- The group leader will contact the parent



- Staff will ensure that all other children are kept safe and closely supervised throughout incident.

If, after 10 minutes the child is not found the group leader will:

- Request the venue call the police to report a missing child
- Provide a description of the child, their needs, parent/carer contact details (as above)
- Contact the parent/carer and delegate a staff member as their contact person
- Update the site's Operational Lead and DSL When the child is found:

If they are found within 10 minutes the group leader will:

- Ask the school office to update the parent/carers; we recognise that during the time a child is missing, however briefly, all involved, parents/carers and others suffer great fear, guilt and distress and the DSL, DST and Operational Leads, will arrange to provide reassurance from the most appropriate staff member.
- Speak with the child to check how they are, reassure them where necessary and establish where they were and what happened;

If the child is found safe and well by the police after they have been contacted by the DSL, Operational Lead or venue security staff, the police will contact the parents/carers to agree what the next steps are (i.e. Child to return home/school); they will also contact the school to arrange a welfare visit at the school the next day if they are aware that the child returned home and did not come back to the school/school trip on the day they were reported missing . Alternatively, the police may arrange the welfare visit to take place at the child's home on the same day.

Recording information

A written record of the incident and any action taken should be made as soon after the incident as practicable. The system the school uses is CPOMS and all staff should input any relevant information including conversations with parents, carers, police, venue, the local authority and any other person they feel has contributed to the collection of information about the incident.

The DSL and Operational Leads, based on their involvement and information received via CPOMS, will establish how the situation occurred, how effective was the response and whether action could be taken to ensure it does not happen again which, depending on the outcome, will be communicated to the staff team in the debrief.

Please also refer to the following policies and codes of conduct in conjunction;

- Anti-Bullying
- Behaviour
- Data Protection
- E-Safety
- Health & Safety
- Managing Allegations of Abuse Against Staff



- Physical Contact & Interventions
- Safer Recruitment
- SEND
- Staff Code of Conduct
- Trips & Visits
- Home visiting & Lone working
- Home School Agreement virtual learning May 2020
- COVID-19 Risk Assessment & Addendum



Appendix E

The following Safeguarding and Physical Contact Guidelines must be followed at all times:

Staff must exercise the highest level of professionalism and adhere to strict safeguarding policies when managing learner behaviour and access to certain areas or equipment.

Maintaining Boundaries Without Physical Contact

- Staff are permitted to implement school rules and boundaries to stand their ground and prevent learners from accessing restricted areas or equipment.
- Staff as a last result may use their hands to physically restrain or block a learner to keep them safe.
- It is acceptable to put your arms out to create a wider frame to inhibit access to certain areas or equipment.

Avoiding Direct Physical Engagement

- If a learner comes into contact with you, this is not considered a violation.
- However, staff must never extend their arms or move their core towards the learner to engage physically.
- If a learner is persistent in trying to push past you with force, you must consider the potential safety risks in restricting them from proceeding and the need to engage in any form of appropriate physical restraint.

De-escalation Strategies

- Use verbal communication and clear instructions to guide the learner away from restricted areas.
- Maintain a calm and authoritative tone to discourage escalation.
- Seek immediate support from other staff members or security personnel if a learner is becoming aggressive or unmanageable.
- Reporting and Documentation.
- Any incident involving physical contact must be documented and reported on CPOMS and the Bound & Numbered book.
- Staff should provide a factual account of the incident, including the actions taken and the response of the learner.
- If a serious breach occurs, escalate the matter in line with the safeguarding policies and involve external authorities as necessary.



Conclusion

Maintaining a safe and professional environment is crucial. Staff must be fully aware of their responsibilities regarding physical contact and follow these safeguarding measures at all times. Any uncertainties regarding these guidelines should be directed to your line manager or DSL.

Thank you for your continued commitment to the safety and well-being of our learners.