



# ST FRANCIS SCHOOL

## CHILD PROTECTION AND SAFEGUARDING POLICY (B1) DECEMBER 2024

### KEY EXTERNAL CONTACT DETAILS

<b>Local Authority Designated Officer (LADO)</b>	Tel: 0300 456 0108 (Option 6)  Email: LADO@wiltshire.gov.uk
<b>Multi-Agency Safeguarding Hub (including SVPP Safeguarding Vulnerable People Partnership)</b>	<b>0300 4560108 - Multi-Agency Safeguarding Hub (MASH), standard working hours:</b> <ul style="list-style-type: none"><li>● <b>Monday to Thursday from 8.45am to 5pm</b></li><li>● <b>Friday from 8.45am to 4pm</b></li><li>● <b>OUT OF HOURS:0300 456 0100 (5.00pm-8.45am)</b></li><li>● <b>Integratedfrontdoor@wiltshire.gov.uk</b></li></ul>
<b>Support and Advice about Extremism</b>	<b>Prevent team</b> 01278 647466 EMERGENCY: 999 NON EMERGENCY NUMBER: 101 EMAIL: PreventReferrals@wiltshire.police.uk  <b>Department for Education</b> NON EMERGENCY NUMBER: 020 7340 7264 EMAIL: <a href="mailto:counter.extremism@education.gsi.gov.uk">counter.extremism@education.gsi.gov.uk</a>

<b>NSPCC Whistleblowing Advice Line</b>	<p>ADDRESS: Weston House 42 Curtain Road London EC2A 3NH</p> <p>TEL: 0800 028 0285 EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>NSPCC Report Abuse in Education Advice Line (for people who have experienced sexual harassment or abuse in education)</b>	<p>TEL: 0800 136 663</p> <p>EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>NSPCC Whistle Advice Line</b>	<p>Tel: 0800 136 663</p> <p>EMAIL: <a href="mailto:help@nspcc.org.uk">help@nspcc.org.uk</a></p>
<b>Disclosure and Barring Service</b>	<p>ADDRESS: DBS customer services PO Box 3961 Royal Wootton Bassett SN4 4HF</p> <p>TEL: 03000 200 190 EMAIL: <a href="mailto:customerservices@db.gov.uk">customerservices@db.gov.uk</a></p>
<b>Teaching Regulation Agency</b>	<p>ADDRESS: Teacher Misconduct Ground Floor South Cheylesmore House 5 Quinton Road Coventry CV1 2WT</p> <p>TEL: 0207 593 5393 EMAIL: <a href="mailto:misconduct.teacher@education.gov.uk">misconduct.teacher@education.gov.uk</a></p>
<b>OFSTED Safeguarding Children</b>	<p>TEL: 0300 123 4666 (Monday to Friday from 8am to 6pm)</p> <p>EMAIL: <a href="mailto:Whistleblowing@ofsted.gov.uk">Whistleblowing@ofsted.gov.uk</a></p>

<b>Independent Schools Inspectorate</b>	TEL: 0207 6000100 EMAIL: <a href="mailto:concerns@isi.net">concerns@isi.net</a>
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**KEY SCHOOL CONTACT DETAILS**

<b>Board Level Lead for Safeguarding / Safeguarding Governor</b> Mrs Carrie Askew	Email: <a href="mailto:Operations@inspiredlearninggroup.co.uk">Operations@inspiredlearninggroup.co.uk</a>  Telephone number: 07789 882597
<b>Chair of School Board</b> Mr David Tidmarsh	Email: <a href="mailto:david@inspiredlearninggroup.co.uk">david@inspiredlearninggroup.co.uk</a>
<b>Proprietor</b> Mr Amit Mehta	Telephone number: 020 7127 9862

<p><b>Designated Safeguarding Lead ("DSL") and Deputy Designated Safeguarding Lead ("DDSL")</b></p>	<p><b>Main DSL for the School</b>  Jonty Butler  TEL: 01672 563228  EMAIL: <a href="mailto:butlerj@stfpewsey.co.uk">butlerj@stfpewsey.co.uk</a></p> <p><b>DDSL</b>  Rachel Ashman  TEL: 01672 563228  EMAIL: <a href="mailto:ashmanr@stfpewsey.co.uk">ashmanr@stfpewsey.co.uk</a></p> <p><b>Nursery DSL</b>  Maria Urbietta-Myers  TEL: 01672 563570  EMAIL: <a href="mailto:urbietta-myersm@stfpewsey.co.uk">urbietta-myersm@stfpewsey.co.uk</a></p> <p><b>Nursery DDSL</b>  Holly van Lochem - Deputy DSL for the Preschool   Location - Haybrook   Int Tel for Pre School - 1022   EMAIL - <a href="mailto:vanlochemh@stfpewsey.co.uk">vanlochemh@stfpewsey.co.uk</a></p>
<p><b>Designated Teacher for Looked After Children</b></p>	<p>Rose Tomlin  TEL: 01672 563228  EMAIL: <a href="mailto:tomlinr@stfpewsey.co.uk">tomlinr@stfpewsey.co.uk</a></p>
<p><b>Head</b></p>	<p>David Lee  TEL: 01672 563228  EMAIL: <a href="mailto:headmaster@stfpewsey.co.uk">headmaster@stfpewsey.co.uk</a></p>

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## POLICY STATEMENT

This policy applies to St Francis School ("the School") which includes the EYFS setting. This policy is reviewed and updated annually (as a minimum) and is available on the School website.

This policy has regard to the following guidance and advice:

- **Keeping Children Safe in Education (September 2024) ("KCSIE")**
  - KCSIE incorporates the additional statutory guidance Disqualification under the Childcare Act 2006 (September 2018)
  - KCSIE also provides links to various toolkits and additional advice and support
- **Working Together to Safeguard Children (updated Dec 2023) ("WT")**
  - WT refers to the non-statutory advice: Information sharing (May 2023))
- **Prevent Duty Guidance: for England and Wales (2023) ("Prevent")**. Prevent is supplemented by non-statutory advice and a briefing note:
  - The Prevent duty: Departmental advice for schools and childminders(June 2015)
  - The use of social media for on-line radicalisation (July 2015)
- **Relationships education, relationships, and sex education (RSE) and health education (September 2021).**
- **The Charity Commission guidance Safeguarding and protecting people for charities and trustees (June 2022)**

This policy also takes into account the procedures and practice of Wiltshire Council as part of the inter-agency safeguarding procedures in line with their Safeguarding Vulnerable People Partnership (SVPP).

This policy should be read alongside the following School policies:

- Behaviour Policy
- Code of Conduct for Safer Working Practice Policy
- Anti Bullying Policy
- E-Safety Policy
- Physical Restraint Policy
- Intimate Care policy (EYFS)
- Recruitment, Selection and Disclosures Policy and Procedure
- Whistleblowing Policy
- Learning Support Policy (SEND)
- RSE Policy



## CONCERNS ABOUT A CHILD

The School and its employees, Governors and volunteers have a duty to consider at all times the best interests of the pupil and take action to enable all pupils to achieve the best outcomes. Safeguarding and promoting the welfare of children is everyone's responsibility. The School adopts a 'whole school' approach to safeguarding, ensuring safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. Parents are encouraged to raise any concerns directly with the School, if necessary, using this safeguarding policy for concerns about the safety and/or welfare of children. Parents may contact the ISI directly if they wish.

The School has arrangements for listening to children and providing early help.

We recognise that because of the day-to-day contact with children, all school staff are well placed to observe the outward signs of abuse. We must also maintain an attitude of 'it could happen here'. St. Francis School will therefore:

- Establish and maintain an environment where children feel secure and are encouraged to talk, are listened to and staff members always act in the best interest of the child;
- Ensure that children know there are adults in the school whom they can approach if they are worried or in difficulty;
- Include in the curriculum, activities and opportunities for PSHE (known as LFL - Learning for Life at St Francis) which equip children with the skills they need to understand safeguarding (including online safety), stay safe from abuse and to know whom to turn to for help;
- Include, in the curriculum, material that will help children develop realistic attitudes to the responsibilities of adult life, particularly with regard to childcare and parenting skills;
- Ensure all staff, including ancillary staff and governors, receives comprehensive training on child protection issues every three years in accordance with the requirements of the SVPP and also updates when required, but at least annually to provide them with relevant skills and knowledge to safeguard children effectively. In addition all new and temporary staff will receive training as part of their induction process including safeguarding and child protection policy (including policy and procedures for dealing with peer on peer and sexual harassment).
- To ensure best practice, the Designated Safeguarding Lead and Deputy DSL for child protection will receive appropriate training every two years. Whilst considering the above training requirements, we will have regard to the Teachers' Standards which set out the expectation that all teachers manage behaviour effectively to ensure a good and safe educational environment and require teachers to have a clear understanding of the needs of all pupils.
- Opportunities will be provided for staff to contribute to and shape safeguarding arrangements and the child protection policy.
- Training made available will enable staff to identify signs of possible abuse, neglect and exploitation at the earliest opportunity, and to respond in a timely and appropriate way. These may include:
  - significant changes in children's behaviour including movement towards extremism or radicalisation (See Appendix 8 for Prevent Duty guidance);
  - deterioration in children's general well-being;

- significant changes in mental health;
- unexplained bruising, marks or signs of possible abuse or neglect;
- children's comments which give cause for concern;
- any reasons to suspect neglect or abuse outside the setting, for example in the child's home;
- inappropriate behaviour displayed by other members of staff, or any other person working with the children. For example, inappropriate sexual comments; excessive one-to-one attention beyond the requirements of their usual role and responsibilities; or inappropriate sharing of images.

A child in need is defined under the Children Act 1989 as a child who is unlikely to achieve or maintain a reasonable level of health or development, or whose health and development is likely to be significantly or further impaired, without the provision of services; or a child who is disabled. Local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. Children in need may be assessed under section 17 of the Children Act 1989. 3.6.1

### **Early Help**

St Francis recognises and understands the need to support pupils, who may be in difficulty for different reasons, including potential abuse, but also, importantly, children who are in need of particular support due to self-harm, missing education, mental health or other issues. The school recognises that Early Help, that is, providing support as soon as a problem emerges, at any point in a child's life is crucial. Effective early help relies upon the school and local agencies working together to:

- Identify children and families who would benefit from early help;
- Undertake an assessment of the need for early help;
- And provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to significantly improve the outcomes for the child.

In the situation where any pupil fails to attend school regularly, or has been absent without the school's permission for a continuous period of 10 school days or more the school will inform the local authority, following the Children Missing Education August 2024 statutory guidance.

If a pupil was discovered to be missing during the course of a school day, there is a procedure to follow, which is contained within the Missing Persons Policy (B9) and also the EYFS and Nursery Missing Child Policies. Any child may benefit from early help, but all school staff should be particularly alert to the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need;
- is a young carer;

- is showing signs of being drawn in to antisocial or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from education, home or care;
- Has experienced multiple suspensions, is at risk of being permanently excluded from schools, colleges and in Alternative Provision or a Pupil Referral Unit;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves;
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child (Private fostering is a private arrangement between a parent and a carer. When a child under 16 (or 18 if disabled) is cared for and provided with accommodation, by an adult who is not a relative, for 28 days or more, it is called private fostering and children's social care must be informed); and
- is persistently absent from education, including persistent absences for part of the school day.

Early help means providing support as soon as a problem emerges at any point in a child's life, from the foundation years through to the teenage years.

In the first instance, staff who consider that a pupil may benefit from early help should discuss this with the School's DSL. The DSL will consider the appropriate action to take in accordance with the Wiltshire Council SVPP referral threshold document ([Wiltshire Safeguarding Vulnerable People Partnership \(SVPP\)](#)) including using the Wiltshire's Integrated Front Door (MASH and Early Support Hub). The DSL will support staff in liaising with external agencies and professionals in an inter-agency assessment, as appropriate. If early help is appropriate, the matter will be kept under review and consideration given to a referral to children's social care if the pupil's situation does not appear to be improving. The DSL is also able to contact the MASH team and hold pupil anonymous conversations to help decide what action is to be taken.

### **Definitions of safeguarding and types and signs of abuse**

Providing help and support to meet the needs of children as soon as problems emerge from maltreatment, whether that is within or outside the home, including online; preventing impairment of children's mental and physical health or development; ensuring that children grow up in circumstances consistent with the provision of safe and effective care; and taking action to enable all children to have the best outcomes.

Abuse is a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm or by failing to act to prevent harm. Harm can include ill treatment that is not physical as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse, including where they see, hear or experience its effects. Children may be abused in a family or in an institutional or community setting

by those known to them or, more rarely, by others (e.g. via the internet). Abuse can take place wholly online, or technology may be used to facilitate offline abuse. They may be abused by an adult or adults or by another child or children. Abuse can be:

- physical abuse;
- emotional abuse;
- sexual abuse;
- neglect.

Staff are referred to Appendix 1 of this policy for further detail of the types of abuse and possible signs of abuse, as well as further information regarding specific safeguarding issues such as child criminal and/or sexual exploitation.

### **PROCEDURES FOR DEALING WITH CONCERNS ABOUT A CHILD**

If staff suspect or hear any allegation or complaint of abuse, exploitation, or neglect from a child or any third party, they must act immediately and follow the relevant procedure as set out by Wiltshire Council's Safeguarding Vulnerable People Partnership (SVPP) and taking account of guidance issued by the Department of Education (KCSIE).

The DSL can use the Digital Assessment and Referral Tool (DART) <http://www.wiltshirepathways.org.uk/digital-assessment-and-referral-tool-dart/>) as appropriate as part of a holistic assessment of the child's needs.

All staff can use the Flowcharts provided by the SVPP (Appendix 2) that set out the required procedure for staff to follow when they have a safeguarding concern about a child are displayed in the staffroom and adult cloakrooms for easy reference.

The Multi-Agency Thresholds for Safeguarding Children on the SVPP website about suitable action to take when a pupil has been identified as making inadequate progress or having an unmet need. All staff can use the Flowcharts provided by the Wiltshire SVPP.

Staff should not assume that somebody else will take action and share information that might be critical in keeping children safe.

The guidance, *Information Sharing: Advice for Practitioners Providing Safeguarding Services to Children, Young People, Parents and Carers* supports staff who have to make decisions about sharing information. The governing body recognises the importance of information sharing between practitioners and local agencies, including ensuring arrangements for sharing information within the School and with local authority children's social care (Wiltshire SVPP/MASH team), the safeguarding partners and other organisations, agencies, and practitioners as required. Fears regarding sharing information under the Data Protection Act 2018 and the UK GDPR should not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children, and neither the DPA 2018 or the UK GDPR prevent the sharing of information for the purposes of keeping

children safe. If in doubt about what information can and should be shared, staff should speak to the Designated Safeguarding Lead ("DSL").

The governing body will ensure that staff understand the relevant data protection principles which allow them to share (and withhold) personal information, including:

- being confident of the processing conditions which allow them to store and share information for safeguarding purposes, including information, which is sensitive and personal and should be treated as 'special category personal data'
- understanding that 'safeguarding of children and individuals at risk' is a processing condition that allows the sharing of special category personal data, including without consent where there is good reason to do so. For example, information may be shared without consent where: it is not possible to gain consent; it cannot be reasonably expected to gain consent; and, gaining consent would place a child at risk
- not providing pupils' personal data where the serious harm test is met.

All staff should:

- know the name of the Designated Safeguarding Lead, their deputies and their roles
- listen carefully, keeping an open mind and not making any decision as to whether or not abuse has taken place
- avoid asking leading questions
- reassure the individual that the allegation/complaint will be taken seriously and that they will be supported and kept safe
- ensure that the child is not made to feel ashamed for making the report or given the impression that they are creating a problem by making the report
- not guarantee absolute confidentiality (as this may ultimately not be in the best interests of the child) and explain that the information needs to be passed to the appropriate person who will ensure that the correct action is taken
- be aware that the individual may not feel ready or know how to tell someone that they are being abused, exploited or neglected, and/or may not recognise their experiences as harmful. Staff should exercise professional curiosity and speak to the DSL if they have concerns
- determine how best to build trusted relationships with children and young people which facilitate communication
- keep a sufficient written record of the conversation. The record should include the date, time and place of the conversation and the essence of what was said and done by whom and in whose presence. The record should be signed by the person making it and should use names, not initials;
- keep the record secure and hand it to the Designated Safeguarding Lead.
- Any evidence (for example, scribbled notes, mobile phones containing text messages, clothing, computers) must be safeguarded and preserved.

All concerns, of a welfare or child protection nature must be reported to the Designated Safeguarding Lead. Any member of staff who has concerns should complete an online form using MyConcern (or if you are unable to access the internet use a Child Welfare and Protection Form

(Appendix 3a, 3b), ensure it is signed and dated, and pass it to the DSL as soon as possible). Anyone can make a referral and these do not require parental consent to statutory agencies however where possible the parents will be contacted for their support unless there is a risk to the child.

A written record of all discussions and decisions (together with reasons) made under these procedures will help if/when responding to any complaint about the way a case has been handled. The record should include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and a note of any action taken, the decision reached and the outcome.

Where the allegation relates to harmful sexual behaviours, if possible, the disclosure should be managed with two members of staff present (preferably one of them being the DSL or their deputy). Where there is a safeguarding concern, the School will ensure the pupil's wishes and feelings are taken into account when determining what action to take and what services to provide. This is particularly important in the context of harmful behaviours, such as sexual harassment and sexual violence. The School manages this by ensuring that there are systems in place that are well promoted, easily understood and easily accessible for children to confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback. The School operates its processes with the best interests of the pupil/s at their heart.

### **Contextual Safeguarding**

Safeguarding incidents and/or behaviours can be associated with factors outside the School and can occur between children outside School. All staff, but especially the DSL and any deputies, should consider the context within which such incidents and/or behaviours occur. The School will, as part of the wider assessment of children, consider whether environmental factors are present in a child's life that are a threat to their safety and/or welfare. The School will share as much information with Children's Social Care as possible as part of the referral process to enable consideration of all the available evidence and the full context of any abuse.

### **What staff should do if they have concerns about a child**

If staff (including governors, supply staff, agency staff and volunteers) have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to the Wiltshire MASH team. As set out above, staff should not assume that somebody else will take action and share information that might be critical in keeping children safe; they should maintain an attitude of "it could happen here". If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. If a child's situation does not appear to be improving, the DSL should press the MASH team for reconsideration. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing and placed on MyConcern.

### **What staff should do if a child is in danger or at risk of harm**

If staff (including governors, supply staff, agency staff and volunteers) believe that a child is in immediate danger or at risk of harm, they should make an immediate referral to children's social care and/or the police. Anyone can make a referral. Any such referral must be made immediately and in any event within 24 hours (one working day) of staff being aware of the risk. Parental consent should be gained unless there is an increased risk to the child if the parents are notified. If anyone other than the DSL makes a referral, they should inform the DSL as soon as possible that a referral has been made. The local authority social worker should acknowledge receipt to the referrer within 24 hours and make a decision about the next steps and type of response required. Staff should challenge any inaction and follow this up with the DSL and children's social care as appropriate. All concerns, discussions and decisions made and the reasons for those decisions should be recorded in writing.

The School's Local Safeguarding Children Executive is Wiltshire Council's Safeguarding Vulnerable People Partnership (SVPP). A full copy of their local procedures can be found via the following link [Wiltshire Safeguarding Vulnerable People Partnership \(SVPP\)](#).

Where children are engaged in 1:1 teaching, for both the protection of the child and the staff member, teaching staff are advised to use rooms which have windows in the doors or to leave the door open when teaching is taking place.

#### **What staff should do if a child is seen as at risk of radicalisation**

Staff should follow the School's normal referral processes when there are concerns about children who may be at risk of being drawn into terrorism, as set out above. This may include a Prevent referral or referral to children's social care depending on the level of risk. However, if staff have concerns that there is an immediate/significant risk of a child being drawn into terrorism they must call:

In an emergency:       Tel: 999 or

The Prevent team:       Tel: 01278 647466

Or in a non-emergency: Tel: 101

Further advice and support can also be sought from Wiltshire SVPP.

The School, in recognition that pupils may be at risk of being drawn into terrorism or other forms of extremism, carries out appropriate annual risk assessments (following consultation with local partners, such as the police) of the potential risk in the local area. Such risk assessments are discussed with the Head, DSL and DDSL and governors responsible for safeguarding to ensure the School's safeguarding arrangements are sufficiently robust to help prevent and protect children from being drawn into terrorism and are regularly revised.

#### **What staff should do if they discover an act of Female Genital Mutilation ("FGM")**

Staff must report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the member of staff has a good reason not to, they should still consider and discuss any such case with DSL and involve children's social care as appropriate. Staff are referred to

Appendix 1 of this policy for the procedure to be followed where they suspect that a pupil may be at risk of FGM.

### **What staff should do if they have concerns that children are at risk from or involved with serious violent crime**

All staff should be aware of indicators which may signal that children are at risk from or are involved with serious violent crime. These may include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, new or expensive items (which could indicate grooming), signs of self-harm or a significant change in wellbeing, signs of assault or unexplained injuries.

We are committed to success in learning for all our pupils as one of the most powerful indicators in the prevention of youth crime.

Our curriculum includes teaching conflict resolution skills and understanding risky situations to help our children develop the social and emotional skills they need to thrive.

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

If staff have any concerns about a child (as opposed to a child being in immediate danger), they should, where possible, speak with the School's DSL to agree a course of action, although staff can make a direct referral to Wiltshire MASH team.

### **How should staff respond to an incident of nudes and semi-nudes being shared by pupils**

All members of staff in an education setting have a duty to recognise and refer any incidents involving nudes and semi-nudes and will be equipped with the necessary safeguarding training and support to enable them to recognise concerns.

For this purpose, 'sharing nudes/semi-nudes' means the sending or posting of nude or semi-nude images, videos, or live streams by children under the age of 18 online. This could be via social media (including Snapchat), gaming platforms, chat apps (including WhatsApp and iMessage) or forums. It could also involve sharing between devices via services like Apple's AirDrop which works offline. The sharing of nudes and semi-nudes may happen publicly online, in 1:1 messaging or via group chats and/or via closed social media accounts. The images, videos or live streams may include more than one child.

Any direct disclosure by a child will be taken seriously and staff will ensure the child is feeling comfortable and will only ask appropriate and sensitive questions (using the TED system), in order to minimise further distress or trauma to them.

If staff are notified or become aware of an incident of nudes or semi-nudes being shared by a pupil or of a pupil, they should refer the incident to the DSL as soon as possible.



The DSL will follow the DDMSC / UKIS guidance "*Sharing nudes and semi-nudes: how to respond to an incident*" (2024) when responding to a report of sharing nudes and/or semi-nudes. This will include:

- Holding an initial review meeting with appropriate staff. This may include the staff member(s) who heard the disclosure and the safeguarding or leadership team who deal with safeguarding concerns.
- Carrying out interviews with the children involved (if appropriate).
- Informing parents and carers at an early stage and keeping them involved in the process in order to best support the pupil unless there is good reason to believe that involving them would put the child at risk of harm. Any decision not to inform them should be made in conjunction with other services such as the Wiltshire MASH team and/or the police, who would take the lead in deciding when they should be informed.
- Carrying out a risk assessment to determine whether there is a concern that a child has been harmed or is at risk of immediate harm at any point in the process
- If not, the incident can be handled in school in accordance with the "sharing nudes" guidance and the School's Child Protection and Behaviour policies.
- If it is determined that there is a risk of harm, the DSL must make a referral to children's social care and/or the police immediately.

All incidents relating to nudes and semi-nudes being shared need to be recorded, whether they have been referred externally or not. Schools must record the reason for not reporting incidents externally and ensure it is signed off by the Head. Records will be kept in line with statutory requirements set out in *KCSIE* and local safeguarding procedures. No copies of imagery will be taken or retained.

This guidance does not apply to the sharing of images of children under 18 by an adult over 18 as this constitutes child sexual abuse. In the event that staff become aware of such an incident, they should notify the DSL immediately, who should always inform the police as a matter of urgency.

### **What staff should do if a child goes missing from education**

Children who go missing from education, particularly persistently, can be a vital warning sign to a range of safeguarding issues, including neglect and child sexual and/or criminal exploitation, particularly county lines. It is therefore important that the School's response to such absence supports identifying such abuse and helps prevent the risk of them going missing in the future. The School's procedures for unauthorised absence and for dealing with children who go missing from education are to be found in Policy B9 - Missing Persons. Further detail can also be found at Appendix 1 of this policy.

Where reasonably possible, the School will hold more than one emergency contact number for each pupil to provide the School with additional options to make contact with a responsible adult particularly when a child missing from education is also identified as a welfare and/or safeguarding concern. The School will report to Wiltshire Council any pupil who fails to attend school regularly or has been absent from school without the School's permission for a continuous period of 10 school days or more.

## **Wiltshire Protocol for Missing children and children missing education**

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

- *Absent from education persistently, or for prolonged periods and/or on repeat occasions*
- *Missing – whereabouts unknown or*
- *Missing education – (compulsory school age (5-16) with no school place and not electively home educated)*

*The designated teacher for LAC and care leavers discusses any unauthorised/unexplained absence of Looked After Children with Virtual School when required.*

*The DSL shares any unauthorised/unexplained absence of children who have an allocated social worker within 24 hours.*

*Children who do not attend school regularly can be at increased risk of abuse and neglect. Where there is unauthorised/unexplained absence, and*

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

## **What staff should do if a child needs a social worker (Children in Need and Child Protection Plans)**

Children may need a social worker due to safeguarding or welfare needs. Children may need this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour, and mental health.

Local authorities should share the fact a child has a social worker, and the DSL should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.

Where children need a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

**What staff should do if a child requires mental health support** The School has an important role to play in supporting the mental health and wellbeing of its pupils. 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. The School aims to prevent health problems by promoting resilience as part of a whole school approach to social and emotional wellbeing of our pupils. The School recognises the great importance of child well-being and further development is taking place and will be communicated as soon as possible. A policy is currently being developed

Staff can access a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the DfE *Mental Health and Behaviour in Schools* guidance. Public Health England has produced a range of resources to support school teachers to promote positive health, wellbeing, and resilience among young people.

### **What staff should do if they have safeguarding concerns about another staff member**

If staff have safeguarding concerns about another staff member (including supply staff, agency staff, volunteers and contractors), then this should be referred to the Headmaster. Where there are concerns about the Headmaster, this should be referred to the Chair of Governors. In the event of allegations of abuse being made against the Headmaster, staff are referred to the procedures below regarding managing allegations of abuse against staff (including supply staff, agency staff, volunteers, and contractors) and refer the matter directly to the LADO at Wiltshire local authority as per the flow chart at Appendix 4.

The Headmaster is contactable at all times by email [leed@stfpewsey.co.uk](mailto:leed@stfpewsey.co.uk). If for any reason the Headmaster is absent for a longer period than two weeks or is unable to deal with his emails, a nominated deputy will be temporarily announced to all staff.

### **What staff and pupils should do if they have concerns about safeguarding practices in the School**

The School aims to ensure there is a culture of safety and raising concerns and an attitude of 'it could happen here'. Where staff have concerns about poor or unsafe practices and potential failures in the School's safeguarding systems, these should be raised in accordance with the School's whistleblowing procedures which can be found in the Google drive in the Staff Handbook and Policies Personnel Section under Policy G10 Whistleblowing Policy. There will be no disciplinary action taken against a member of staff for making such a report provided that it is done in good faith.

If staff and volunteers feel unable to raise an issue with the School or feel that their genuine concerns are not being addressed, they may use other whistleblowing channels, such as the NSPCC whistleblowing advice line. Contact details for the NSPCC helpline can be found on the Key Contacts page at the start of this policy.

Pupils - Systems are in place and well promoted so that children can confidently report concerns or abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback, including using our child-friendly whistleblowing mechanisms. Please see the [Pupil Whistleblowing Policy and Procedure \(B18\)](#).

### **ARRANGEMENTS FOR DEALING WITH CHILD ON CHILD ALLEGATIONS (INCLUDING CHILD ON CHILD SEXUAL VIOLENCE AND HARASSMENT)**

Child on child abuse is abuse by one or more children against another child. It can be standalone or as part of wider abuse and can happen both inside and outside of school, and online. It can manifest itself in many ways and can include abuse within intimate partner relationships, bullying (including cyber bullying, prejudice-based and discriminatory bullying), abuse within intimate partner relationships between peers, physical abuse (such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm), initiation/hazing type violence and rituals, upskirting, sexting, consensual and non-consensual sharing of nudes and/or semi-nudes, sexual assault, gender-based issues, sexual behaviours including child on child sexual violence and sexual harassment, 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. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children.

These arrangements apply to all reports and concerns of child on child abuse, whether they have happened in school or outside of it, and/or online. Abuse that occurs online or outside of school should not be downplayed and should be treated equally seriously.

Staff will address inappropriate behaviour (even if it appears to be relatively innocuous) to help prevent problematic, abusive and/or violent behaviour in the future.

The School takes a zero-tolerance approach and abusive comments and interactions should never be passed off or dismissed as "banter" or "part of growing up". Nor will harmful sexual behaviours, including sexual comments, remarks or jokes and online sexual harassment, be dismissed as the same or "just having a laugh" or "boys being boys".

Staff will also challenge physical behaviours (that are 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.

The School acknowledges that even if there have been no reported cases of child on child abuse in relation to pupils within the School, such abuse may still be taking place and is simply not being reported.

The School will ensure that children are aware of how they can report abuse, and that they are aware of the procedures that the School will follow once a report has been made. These procedures will be well promoted and in a format that is easily accessible and easily understood by children.

The School recognises that a child is likely to disclose an allegation to someone they trust: this could be any member of staff. By making such a disclosure the pupil is likely to feel that the member of staff is in a position of trust.

The School also recognises that children may not find it easy to tell staff about their abuse verbally and that instead they may show signs or act in ways they hope adults will notice and react to. It is also recognised that an incident may come to a member of staff's attention through a report of a friend, or by overhearing conversations. It is therefore important that all staff are clear on the School's policy and procedures with regards to child on child abuse, and can recognise the indicators and signs of child on child abuse and know how to identify it and how to respond to reports.

The School recognises that a first disclosure to a trusted adult may only be the first incident reported. It is not necessarily representative of a singular incident. Staff will take all reports of abuse seriously regardless of how long it has taken for the child to come forward. Staff will act immediately and will support the victim when they raise a concern.

The School recognises that children with special educational needs and disabilities (SEND) or certain health conditions are three times more likely to be abused by their peers, can face additional safeguarding challenges and may be more prone to peer-on-peer group isolation or bullying

(including prejudice-based bullying) than other children. Concerns are to be reported to the DSL (or DDSLs) and the School will consider extra pastoral support for those children.

The School also recognises that certain children may face additional barriers to reporting an incident of abuse because of their vulnerability, disability, sex, ethnicity and/or sexual orientation.

The School takes steps to minimise the risk of child on child abuse by providing:

- a relevant curriculum, that helps children to develop their understanding of acceptable behaviours, healthy relationships and keeping themselves safe. The curriculum is updated to reflect changes in legislation, specifically this year pupils will be taught for the first time that 'upskirting' is now a criminal offence.
- established/publicised systems for pupils to raise concerns with staff, knowing they will be listened to, supported and valued, and that the issues they raise will be taken seriously.

The DSL liaises with other professionals to develop robust risk assessments and appropriate specialist targeted work for pupils who are identified as posing a potential risk to other children. This is done using a Contextual Safeguarding approach to ensure assessments consider risks posed by any wider environmental factors present in a child's life.

Where an issue of pupil behaviour or bullying gives 'reasonable cause to suspect that a child is suffering, or is likely to suffer, harm', staff should follow the procedures below rather than the School's Anti-Bullying and Behaviour policies.

A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation. The School will take advice from the SVPP on the investigation of such allegations and will take all appropriate action to ensure the safety and welfare of all pupils involved including the alleged victim and perpetrator(s). If it is necessary for a pupil to be interviewed by the police in relation to allegations of abuse, the School will ensure that, subject to the advice of the SVPP, parents are informed as soon as possible and that the pupils involved are supported during the interview by an appropriate adult and until the investigation is completed. Confidentiality will be an important consideration for the School and advice will be sought as necessary from the SVPP and/ or the police as appropriate.

The School will have regard to the procedures set out in *KCSIE* and the *SVSH* at all times.

The victim may ask the School not to tell anyone about the sexual violence or sexual harassment. Advice should be sought from the DSL or DDSL who should consider:

- if parents or carers should normally be informed unless doing so would put the victim at greater risk;
- the basic safeguarding principle that if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to MASH (the Wiltshire local authority children's social care); and
- whether a crime has been committed.

Ultimately, the DSL (or DDSL) will balance the victim's wishes against their duty to protect the victim and other children.

Police may be informed of any harmful sexual behaviours which are potentially criminal in nature, such as grabbing bottoms, breasts and genitalia. Rape, assault by penetration and sexual assaults will be passed to the police. Where a report has been made to the police, the School will consult the police and agree what information can be disclosed to staff and others, in particular, the alleged perpetrator(s) and their parents or carers. If the DSL decides to make a referral to children's social care and/or a report to the police against a victim's wishes, the reasons should be explained to the pupil and appropriate specialist support offered. The DSL may also decide that the children involved may benefit from early help, and may make the necessary referral in accordance with the SVPP referral process.

The School will follow the DDMSC / UKIS guidance "Sharing nudes and semi-nudes" (2024) when responding to an allegation that nudes and/or semi-nudes have been shared.

In the event of disclosures about child on child abuse, all children involved (both victim(s) and perpetrator(s)) will be treated as being at risk, and safeguarding procedures in accordance with this policy will be followed.

Victims will be supported by school staff and support from external agencies will be sought, as appropriate.

When there has been a report of sexual violence, the DSL will make an immediate risk and needs assessment. The DSL will record specifically the time and location of the incident, and any action required to make the location safer (taking advice from the police or MASH team). Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis. The risk and needs assessment should consider:

- the victim;
- whether there may have been other victims;
- the alleged perpetrator(s); and
- all the other children (and, if appropriate, staff) at the School, especially any actions that are appropriate to protect them from the alleged perpetrator(s), or from future harm.

Risk assessments will be recorded (written or electronic) and kept under review. In relation to a report of sexual violence or sexual harassment, the DSL (and indeed all staff) will reassure any victim that they are being taken seriously and that they will be supported and kept safe. The victim will never be made to feel ashamed for making a report nor will they be given the impression that they are creating a problem by reporting sexual violence or sexual harassment; nor would a victim ever be made to feel ashamed for making a report or have their experience minimised.

The School will explain to the child in a way that avoids alarming or distressing them that the law is in place to protect children rather than to criminalise them. The School will consider the age and the developmental stage of the victim, the nature of the allegations and the potential risk of further abuse. The School acknowledges that, by the very nature of sexual violence and sexual harassment, a power imbalance is likely to have been created between the victim and alleged perpetrator(s).The

DSL will consider the risks posed to pupils and put adequate measures in place to protect them and keep them safe and to ensure their educational attainment is not adversely affected as far as is possible. This may include careful consideration of the proximity of the victim and alleged perpetrator and considerations regarding shared classes, sharing School premises (including during any before or after school-based activities), and School transport. The School will also consider the risks posed to the victim from other health needs, including physical, mental and sexual health problems, as well as unwanted pregnancy which may arise as a result of the incident, and will consider recommending additional support. The School will consider intra familial harms and whether any support for siblings is necessary following an incident.

The School will keep a written record of all concerns, discussions and decisions made. The School will reflect on reported concerns, including the decisions made and actions taken, in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or amendments to relevant policies. Where a pattern is identified the School will decide on an appropriate course of action. **In the event that a report is proven to be false, unsubstantiated, unfounded or malicious, the DSL will consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to MASH (Wiltshire children's social care) may be appropriate.**

If a report is shown to be deliberately invented or malicious, the Head will consider whether any disciplinary action is appropriate against the individual who made it in accordance with the School's behaviour policy.

#### **DEALING WITH SAFEGUARDING CONCERNS OR ALLEGATIONS (INCLUDING ONLINE) MADE ABOUT STAFF INCLUDING SUPPLY TEACHERS, VOLUNTEERS AND CONTRACTORS (AND THOSE FROM ORGANISATIONS OR INDIVIDUALS USING THE SCHOOL PREMISES)**

The School's procedures for managing allegations against staff (including supply staff, volunteers and contractors and those from organisations or individuals using the school premises) who are currently working in the School whether in a paid or unpaid capacity follows DfE statutory guidance and SVPP arrangements and applies when staff (including volunteers) have (or are alleged to have):

- 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 indicated that they may pose a risk of harm if they were to work regularly or closely with children; and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children, including behaviour that may have happened outside of school.

Allegations that do not meet the above harm test should be dealt with using the School's procedure for handling low level concerns set out below.

Allegations against a teacher who is no longer teaching should be referred to the police. Historical (non-recent) allegations of abuse should be referred to the police and also the LADO. Non-recent

allegations made by a child will be reported to the LADO in line with the local authority's procedures for dealing with non-recent allegations. The LADO will coordinate with children social care and the police. If an allegation is made against anyone working with children in the School, before contacting the LADO, the School will conduct a basic enquiry in line with local procedures to establish the facts in order to determine whether there appears to be any foundation to the allegation. The School should not undertake their own investigation of the allegation(s) without prior consultation with the LADO or, in the most serious cases, the police, so as not to jeopardise statutory investigations. In borderline cases, the School may discuss informally with the LADO on a no-names basis. When dealing with an allegation about a staff member the School will apply common sense and judgement, deal with allegations quickly, fairly and consistently and will support the person subject to the allegation.

1. Concerns including allegations which appear to meet the above reporting criteria are to be reported straight away to the 'case manager' who is the Headmaster OR to the DSL. If an allegation is reported to the DSL, the DSL will keep the Headmaster informed. Where the Headmaster OR DSL is absent or is the subject of the allegation or concern, reports should be made to the Chair of Governors. Where the Headmaster OR DSL is the subject of the allegation or concern, the Headmaster OR DSL must not be informed of the allegation prior to contact with the Chair of Governors and LADO. Staff may consider discussing any concerns with the DSL and may make any referral via them unless the DSL is the person of concern.
2. The case manager should immediately discuss the allegation with the LADO and consider the nature, content and context of the allegation and agree a course of action including any involvement of the police. (Where the case manager deems there to be an immediate risk to children or there is evidence of a possible criminal offence, or it is an emergency situation, the case manager should contact children's social care and as appropriate the police immediately.) All discussions should be recorded in writing, and any communication with both the individual and the parents of the child(ren) agreed. The LADO should be informed within one working day of all allegations that come to the School's attention and appear to meet the criteria or that are made directly to the police and/or children's social care. The DSL is responsible for ensuring the child is not at risk.
3. Where the case manager is concerned about the welfare of other children in the community, or the member of staff's family, they will discuss these concerns with the LADO and make a risk assessment of the situation. It may be necessary for the LADO to make a referral to children's social care.
4. When to inform the individual who is the subject of the allegation will be considered on a case by case basis and with guidance from the LADO, and if appropriate, the police and/or children's social care. Subject to any objection, the case manager will ensure that the individual who is subject of the allegation is informed as soon as possible and given an explanation of the likely course or action. The case manager will appoint a named representative to keep the individual informed of the progress of the case and will consider what other support is appropriate for the individual.



5. The case manager should give careful consideration as to whether the circumstances of the case warrant suspension from contact with children at the School or whether alternative arrangements should be put in place until the allegation is resolved. The following alternative arrangements should be considered by the case manager before suspending a member of staff:

- 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 to alternative work in the School so the individual does not have unsupervised access to children;
- moving the child or children to classes where they will not come into contact with the member of staff, but this decision should only be made if it is in the best interest of the child or children concerned and takes account of their views. It should be made making it clear that this is not a punishment and parents have been consulted; or,
- temporarily redeploying the member of staff to another role in a different location, for example to an alternative school where available.

These alternatives allow time for an informed decision regarding the suspension, this will, however, depend upon the nature of the allegation.

Suspension should not be an automatic response when an allegation is reported. It should be considered only in cases where there is cause to suspect a child or other children at the School is/are at risk of harm, or the case is so serious that it might be grounds for dismissal. The case manager will give due weight to the views of the LADO, *WT* and *KCSIE* when making a decision about suspension (including with respect to considering alternatives). Where the individual is suspended, the case manager will confirm the decision within one working day, and will ensure they know who their point of contact is in the School and shall provide them with their contact details. The case manager will also record the rationale and justification for the suspension, including what alternatives were considered and why they were rejected.

6. Where further enquiries are required to enable a decision about how to proceed, the LADO and case manager should discuss how and by whom the investigation will be undertaken. The LADO will provide advice and guidance to the School to ensure that an appropriate investigation is carried out. In straightforward cases, the investigation should usually be undertaken by a senior member of staff at the School. Where there is lack of resource, or the nature or complexity of the allegation requires it, an independent investigator may be appointed to undertake the investigation.

7. The case manager will ensure that parents are informed as soon as possible and kept informed about progress of the case, subject to any advice from children's social care or the police. Parents and others will be made aware that there are restrictions on publishing information which may lead to the identification of the teacher subject to the allegation.

8. The case manager will monitor the progress of cases to ensure they are dealt with as quickly as possible in a thorough and fair process. The outcome of the investigation of an allegation will record whether it is substantiated (sufficient evidence to prove it), unsubstantiated (insufficient evidence either to prove or disprove it), false (sufficient evidence to disprove it), malicious

(sufficient evidence to disprove it and that there has been a deliberate act to deceive or cause harm to the person subject of the allegation) or unfounded (to reflect cases where there is no evidence or proper basis which supports the allegation being made).

9. Reviews are conducted at fortnightly or monthly intervals, depending on the complexity of the case. The first review will take place no later than four weeks after the initial assessment and subsequent review dates will be set at the review meeting.
10. The case manager will discuss with the LADO whether a referral to the Disclosure and Barring Service or Teaching Regulation Agency should be made where an allegation is substantiated and the person is dismissed or the School ceases to use their services, or the person resigns or otherwise ceases to provide their services. The School has a legal obligation to report promptly to the Disclosure and Barring Service any person (whether employed, contracted, a volunteer or a student) who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity, or would have been removed had they not left. Further, or in the alternative, if an investigation leads to the dismissal or resignation prior to dismissal of a member of teaching staff specifically, the School must consider making a referral to the Teaching Regulation Agency and a prohibition order may be appropriate (because that teacher has displayed unacceptable professional conduct, conduct that may bring the profession into disrepute or a conviction at any time for a relevant offence).
11. On conclusion of the case, the case manager should review the circumstances of the case with the LADO to determine whether there are any improvements to be made to the School's safeguarding procedures or practices to help prevent similar events in the future. Learning lessons where the allegation is concluded to be either, unfounded, false, malicious or unsubstantiated, the case manager (and if they have been involved, the LADO) should consider the facts and determine whether any lessons can be learned and if improvements can be made.

Where an individual is removed from regulated activity, or would have been removed had the individual not left, including when they are suspended, redeployed to work that is not regulated activity, are dismissed, or have resigned, and the individual has engaged in relevant conduct in relation to children and/or adults, and/or satisfied the harm test in relation to children and/or vulnerable adults, and/or been cautioned or convicted of a relevant (automatic barring either with or without the right to make representations) offence, the School will make a referral to the DBS.

The School has a duty of care to its staff, and whilst the welfare of a child is paramount, the School will offer appropriate welfare support to the adult subject to the investigation and potentially their family. The School will also make every reasonable effort to maintain confidentiality and guard against unwanted publicity whilst an allegation is being investigated or considered. Information will also not ordinarily be shared with other staff or with children or parents who are not directly involved in the investigation.

Where initial discussions lead to no further action, the case manager and the LADO should record the decision and justification for it and agree on what information should be put in writing to the individual concerned, and by whom. Allegations found to be malicious or false will be removed from

the individual's personnel records unless the individual gives consent for retention of the information. In all other circumstances a written record will be made of the decision and retained on the individual's personnel file in accordance with *KCSIE* and a copy will only be provided to the individual concerned. The information to be kept on file includes a clear and comprehensive summary of the allegation, details of how the allegation was followed up and resolved, a note of any action taken, decisions reached and the outcomes, and a declaration on whether the information will be referred to in any future reference. ). All records should be retained until the accused has reached pension age, or for a period of 10 years from the date of the allegation, whichever is longer. Allegations proven to be false, unsubstantiated, unfounded or malicious will not be included in employer references. If an allegation is shown to be deliberately invented or malicious, the DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate. If a report is shown to be deliberately invented or malicious, the Headmaster will consider whether any disciplinary action is appropriate against a pupil who made it in accordance with the School's behaviour policy; or whether the police should be asked to consider if action might be appropriate against the person responsible even if they are not a pupil. In all cases where there are concerns or allegations of abuse, the School will make a serious incident report to the Charity Commission whenever the Commission's guidelines deem it appropriate to do so.

#### **DEALING WITH SAFEGUARDING CONCERNS AND ALLEGATIONS ABOUT SUPPLY TEACHERS AND CONTRACTORS**

The School's procedures for managing allegations against staff above also apply to staff not directly employed by the School, for example, supply teachers provided by an employment agency or business ('the agency'). The School will usually take the lead but agencies should be fully involved (because they have their own policies and procedures) and co-operate with any enquiries from the LADO, police and/or children's social care.

In no circumstances will the School decide to cease to use a supply teacher due to safeguarding concerns, without finding out the facts and liaising with the LADO to determine a suitable outcome. The School will discuss with the agency (or agencies where the supply teacher is working across a number of schools) whether it is appropriate to suspend the supply teacher, or redeploy them to another part of the school, whilst they carry out their investigation.

The School will advise supply teachers being investigated to contact their trade union representative if they have one, or a colleague for support. The allegations management meeting which is often arranged by the LADO should address issues such as information sharing, to ensure that any previous concerns or allegations known to the agency are taken into account by the School during the investigation.

When using an agency, the School should inform the agency of its process for managing allegations but also take account of the agency's policies and their duty to refer to the DBS as personnel suppliers.<sup>114</sup> This should include inviting the agency's human resource manager or equivalent to meetings and keeping them up to date with information about its policies.

Where the agency dismisses or ceases to use the services of a teacher because of serious misconduct, or might have dismissed them or ceased to use their services had they not left the School first, the School must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

### **DEALING WITH CONCERNS OR ALLEGATIONS (THAT DO NOT MEET THE HARM THRESHOLD) AND ALSO KNOWN AS LOW LEVEL CONCERN.**

A low-level concern is any concern that an adult working in or on behalf of the School may have acted in a way that:

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

A 'low-level' concern does not mean that it is insignificant. A concern may be a low-level concern, no matter how small, even if it does no more than give a sense of unease or a 'nagging doubt'. Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse (for example, grooming-type behaviours). The School takes all concerns about safeguarding seriously and recognises that addressing even low-level concerns is important to create and embed a culture of openness, trust and transparency in which the School's values and expected behaviour of its staff are constantly lived, monitored and reinforced by all staff. The school operates a 'low-level' concerns policy in accordance with KCSIE. 'Low-level' refers to behaviour that is: inconsistent with expectations set out in the Staff Behaviour Policy, including inappropriate conduct outside of work, and/or does not meet the allegations threshold, or is otherwise not considered serious enough to consider a referral to the LADO.

All low-level concerns will be reported to the headteacher; low-level concerns about the headteacher will be reported to the chair of governors.

The policy which can be found within the Staff Code of Conduct Policy is repeated below.

The school will:

- ensure all staff are clear about what appropriate behaviour is (as set out in the Staff Behaviour Policy), and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others;
- empower staff to share any low-level safeguarding concerns;
- provide a responsive, sensitive and proportionate handling of such concerns when they are raised, for both the child/ren and the adult; and,
- respond to reports of low-level concerns in accordance with our HR conduct procedures by addressing unprofessional behaviour and support the individual to correct it at an early stage. If the concern has been raised via a third party, the headteacher will collect as much evidence as possible by speaking:

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

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

Staff are encouraged to self-refer where they have found themselves in a situation which could be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in such a way that they consider falls below the expected professional standards.

All low-level concerns will be recorded in writing, retained and reviewed to help recognise any weakness in the school safeguarding system so that potential patterns of concerning, problematic or inappropriate behaviour can be identified.

The School's Staff Code of Conduct policy can be found <https://drive.google.com/drive/u/0/folders/1J1lmjeHG3EITMpshpGVj2DGkn6r8qS7r>.

The aim of the Staff Code of Conduct policy is to provide clear guidance about the standards of appropriate behaviour and actions of its staff so as to not place pupils or staff at risk of harm or of allegation of harm to a pupil. All staff are expected to comply with the standards contained within this Staff Code of Conduct policy at all times.

The procedure for sharing confidentially, any such concerns is via the form at Appendix 5

The Headmaster is the ultimate decision-maker in respect of all low-level concerns.

Staff must share all concerns with the Headmaster without delay so that it can be recorded and dealt with appropriately, sensitively, and proportionately and in a timely manner. Where a low-level concern is raised about the Headmaster, it should be referred to the Chair of Governors. Staff are also encouraged to self-refer in the event that they have found themselves in a situation which may be misinterpreted, might appear compromising to others, and/or on reflection they believe they have behaved in a way that may be considered to fall below the expected professional standard. All concerns will be handled sensitively and will be dealt with appropriately and proportionately. If a concern is raised by a third party, the Headmaster will collect as much evidence as possible by speaking to the person who has raised the concern (if known), to the individual involved and any witnesses. The concern will be recorded in accordance with this policy, in the usual way. The School will address unprofessional behaviour at an early stage and will support the individual to correct it. All low-level concerns will be recorded in writing. The record will include details of the concern, the context within which the concern arose, and details of the action taken. The name of the reporting individual should also be included, unless they have asked to remain anonymous, which will be respected as far as reasonably possible. The records will be kept confidential, will be held securely and in compliance with the Data Protection Act 2018 and the UK GDPR at all times. The information will be retained until the individual has left employment. Low-level concerns will not be included in references unless they relate to issues which would normally be disclosed, for example, misconduct

or poor performance. The School will also reflect on reported concerns in order to identify any patterns of concerning, problematic or inappropriate behaviour which may indicate an unacceptable culture, or any weaknesses in the School's safeguarding system which may require additional training or modified policies. Where a pattern is identified, the School will decide on a course of action, either through its disciplinary procedures, or, where the pattern moved from a concern to meeting the harm threshold, it will follow the above procedure and refer the matter to the LADO. Where a low-level concern relates to a person employed by a supply agency or a contractor, the individual's employer will be notified about the concern, so that any potential patterns of inappropriate behaviour can be identified. If the School is in any doubt as to whether a low-level concern in fact meets the harm threshold, the Headmaster will consult with the LADO and take a more collaborative decision-making approach.

### **SAFER RECRUITMENT**

The School is committed to safer recruitment processes to create a culture that safeguards and promotes the welfare of children in the School whilst deterring and preventing people who are unsuitable to work with children from applying or securing employment, or volunteering opportunities, within the School.

Members of the teaching and non-teaching staff at the School including part-time staff, temporary and supply staff, and visiting staff, such as musicians and sports coaches are subject to the necessary statutory child protection checks before starting work, for example, right to work checks, additional overseas checks (if necessary), verifying identity, taking up references, checking work history and confirming medical fitness for the role. For most appointments, an enhanced DBS check with 'barred list' information will be appropriate. A DBS certificate will be obtained from the candidate before or as soon as practicable after appointment. Alternatively, if the applicant has subscribed to it and gives permission, the School may undertake an online update check through the DBS Update Service. Full details of the School's safer recruitment procedures for checking the suitability of staff, Governors and volunteers to work with children and young people is set out in the School's Recruitment and Selection Policy.

The School's protocols for ensuring that any visiting speakers, whether invited by staff or pupils themselves, are suitable and appropriately supervised is defined on the Visiting Speaker Policy - B18<sup>134</sup>

Assurances are sought for contractors who are required on site, including identification checks on arrival. Appropriate vetting checks are carried out by the school for self-employed individuals. The School's procedures for managing contractors attending the School site can be found in the School's Recruitment, Selection and Disclosure Policy and Procedure (G13).

### **MANAGEMENT OF SAFEGUARDING**

The School's DSL is Jonty Butler who is a member of the leadership team. The School's DDSL's are listed below and these are the people to whom reports should be made in the absence of the DSL. This ensures there is the required cover for the role at all times.

DDSL for Reception to Year 8 - Rachel Ashman

Nursery DSL - Maria Urbieta-Myers

Nursery DDSL - Holly van Lochem

The DSL {and DDSL's} contact details can be found on the Key Contacts page at the start of this policy.

The designated safeguarding lead should take lead responsibility for safeguarding and child protection (including online safety and understanding the filtering and monitoring systems and processes in place). They are also able to keep detailed, accurate, secure written records of all concerns, discussions and decisions made including the rationale for those decisions. This should include instances where referrals were or were not made to another agency such as LA children's social care or the Prevent program etc. The D/DSL constantly monitors all children with concerns, whether a referral to MASH/IFD has been made or not. The DSL's responsibility is to maintain an overview of safeguarding within the School, to open channels of communication with local statutory agencies, refer incidents to third parties (including the local authority children's services, the DBS, Channel and the police) where appropriate, to support staff in carrying out their safeguarding duties and to monitor the effectiveness of the School's policies and procedures in practice. The D/DSL provides feedback to any staff who share concern/s. The DSL works with the Governors to review and update the School's safeguarding policy. Where a pupil leaves the School, including for in-year transfers, the DSL will also ensure their child protection file is transferred to the new school (separately from the main pupil file) as soon as possible and within 5 days for an in-year transfer or within the first 5 days of the start of a new term. The DSL will ensure secure transit and obtain confirmation of receipt. In addition to the child protection file, the DSL should also consider if it would be appropriate to share any additional information with the new school in advance of a child leaving to help them put in place the right support to safeguard this child and to help the child thrive in the school. The DSL regularly reviews the School's and their own practices and concerns about welfare and safeguarding matters. This includes the personal and professional duty of all staff to report welfare and safeguarding concerns to the DSL, or in the absence of action, directly to local children's services. During term time, the DSL and/or a DDSL will always be available in person during school hours for staff in the School to discuss any safeguarding concerns. If for operational reasons, a DSL or DDSL is not available in person, or for out of hours/out of term activities, the DSL or DDSLs can be contacted using the details on the Key School Contact Details page at the beginning of this policy.

The DSL or DDSLs should liaise with the three safeguarding partners and work with other agencies in line with *WT. "NPCC - When to call the police"* can assist the DSL or DDSLs understand when they should consider calling the police and what to expect when they do. If the School has questions about any police investigation, it will ask the police. The DSL or DDSLs will also be responsible for liaising with the senior mental health lead and, where available, the Mental Health Support Team, where safeguarding concerns are linked to mental health. The DSL and DDSLs should be confident as to what local specialist support is available to support all children involved in sexual violence and sexual harassment and be confident as to how to access this support when required.

Whilst the Headmaster should ensure that the policies and procedures adopted, particularly those concerning referrals of cases of suspected abuse, neglect and exploitation, are understood and followed by all staff, and the Governors are ultimately responsible for ensuring staff are competent, supported and regularly reviewed in relation to safeguarding, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility should not be delegated. Full details of the DSL's role can be found at Annex C of *KCSIE*.

## **TRAINING**

### **All Staff**

All new staff will be provided with induction training that includes:

- the child protection and safeguarding policy (including the policy and procedures to deal with child on child abuse);
- the role and identity of the DSL and any DDSLs
- the behaviour policy (including measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying);
- the staff Code of conduct for Safe Working Practice Policy including the School's Whistleblowing Policy and the Staff ICT Use Policy, staff/pupil relationships and communications including the use of social media
- the safeguarding response to children who go missing from education;
- a copy of Part one of *KCSIE* and Annex A at least;
- School leaders and staff who work directly with children will also be required to read Annex B of *KCSIE* (and Part five of *KCSIE*).
- Prevent Fact Sheet and Training
- Plan of support for individuals appropriate to the role for which they have been hired
- Confirmation of the conduct expected of staff within the school – our Staff Behaviour Policy
- Opportunities for a new member of staff to discuss any issues or concerns about their role or responsibilities
- Confirmation of the line management/mentor process whereby any general concerns or issues about the person's ability or suitability will be addressed.
- The school's response to children who are absent and/or missing from education, and the school's protocol about managing absence
- Procedure to follow in case of an allegation being raised against an adult
- Professional disagreement and escalation including the SVPP Case Resolution Protocol

Copies of the above documents are provided to all staff during or prior to induction. Temporary staff and volunteers are provided with the same documents as permanent staff. All staff are also required to:

- Read at least Part one of *KCSIE* and confirm that they have done so. Each time Part one of *KCSIE* is updated by the Department for Education, staff will be updated on the changes via INSET training .



- Understand key information contained in Part one of *KCSIE*. The School will ensure staff understanding by ensuring all personnel complete the EDUCARE course questionnaire.
- Receive training in safeguarding and child protection regularly (at least annually), in line with advice from the Wiltshire Council.
- All staff will receive appropriate safeguarding and child protection training (including online safety which, amongst other things, includes an understanding of the expectations, applicable roles and responsibilities in relation to filtering and monitoring) at induction. The training will be regularly updated. In addition, all staff will receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins, and staff meetings), as required, and at least annually, to continue to provide them with relevant skills and knowledge to safeguard children effectively.
- Training will include online safety and harmful sexual behaviours (including child on child sexual violence and harassment). It will also include Prevent awareness training to equip staff to raise concerns appropriately by ensuring all staff have the knowledge and confidence to identify children at risk of being drawn into terrorism; are able to challenge extremist ideas; and know how to refer children and young people for further help.
- Undertake regular informal updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively, including online. The School provides these via emails, staff meetings and INSET training.
- Complete Educare courses as requested by the School.

The governing body will ensure that all governors receive appropriate safeguarding and child protection (including online) training at induction. This training should equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in the School are effective and support the delivery of a robust whole school approach to safeguarding. Their training should be regularly updated.

The governing body is aware of their obligations under the Human Rights Act 1998 (HRA), the Equality Act 2010, and their local multi-agency safeguarding arrangements. Under the Human Rights Act 1998, it is unlawful for the School to act in a way that is incompatible with the European Convention on Human Rights (ECHR) Convention. Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach conventions set out in the European Convention on Human Rights (ECHR) Convention.

### **DSL(s)**

The DSL receives updated child protection training at least every two years to provide them with the knowledge and skills required to carry out the role. This includes local inter-agency working protocols, participation in child protection case conferences, supporting children in need, identifying children at risk of radicalisation, record keeping and promoting a culture of listening to children, training in the Wiltshire Council's approach to *Prevent* duties and harmful sexual behaviours. Further details of the required training content for the DSL are set out in Annex C of *KCSIE*.

In addition to their formal training, the DSL's knowledge and skills are updated at least annually to keep up with any developments relevant to their role. In particular, the School will support the DSL in developing their knowledge and skills to understand the views of children including to encourage a culture of listening to children and taking account of their wishes, as well as having an awareness of the difficulties children may face in approaching staff with a disclosure. The DDSLs are trained to the same level as the DSL.

## **OVERSIGHT OF SAFEGUARDING, INCLUDING ARRANGEMENTS FOR REVIEWING POLICIES AND PROCEDURES**

The headteacher ensures that the policies and procedures, adopted by the governing body (particularly those concerning referrals of cases of suspected abuse and neglect), are understood, and followed by all staff and should be easily understood by staff, children and parents by re-visiting regularly.

The headteacher reports at least three times per year to the governors around the effectiveness of the school's safeguarding procedures, and in particular, child-on-child incidents, including all aspects of trend analysis. The school's approach to online safety and filtering and monitoring is reviewed annually as a minimum.

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

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

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

The nominated governor meets the DSL twice a term (six times a year) to monitor the effectiveness of this policy.

Philip Humphries-Cuff is the board-level lead designated to take a lead in relation to responsibility for the safeguarding arrangements in the School. Jane is a member of the governing body. In her role she:

- Champions child protection issues within the school and liaises with the Headmaster;
- Provides an overview of the Child Protection Policy and all other related policies;
- Audits safeguarding measures annually alongside the Designated Safeguarding Lead and the Headmaster, reporting back to Full Governing Body;
- Carries out an annual child protection and safeguarding audit for the Governing Body, and tracks progress against safeguarding action plans, reviews mid-year, using the Wiltshire Council annual School Safeguarding Audit return as a starting point;
- Ensures the school has a Designated Safeguarding Lead (DSL) (who is a senior member of staff) and Deputy DSL(s) for child protection and safeguarding all of whom have received appropriate training and support for their roles (Designated Safeguarding Lead must have WSCB Foundation and Advanced training or equivalent and then inter-agency training every two years) (the DSL is Jonty Butler; Rachel Ashman will deputise in the absence of Jonty Butler);
- Meets the DSL twice a term (six times a year) to monitor the effectiveness of this policy.

The Safeguarding Governor (Philip Humphries-Cuff), reviews the annual updates of the Child Protection Policy and it is then agreed at Board Level at the first full board meeting each academic year. The School draws on the expertise of staff, including the DSL and their deputies, in shaping the School's safeguarding arrangements and policies. The School's safeguarding policies and procedures should be transparent, clear, and easy to understand for staff, pupils, students, parents, and carers.

If there has been a substantiated allegation against a member of staff, the School will work with the LADO to determine whether there are any improvements to be made to the School's procedures or practice to help prevent similar events in the future.

## **THE SCHOOL'S ARRANGEMENTS TO FULFIL OTHER SAFEGUARDING RESPONSIBILITIES**

### **Teaching children how to keep safe**

The governing body ensures that all pupils are taught about safeguarding, including online safety, through the curriculum and PSHE to help children to adjust their behaviours, both inside and outside of School, in order to reduce risks and build resilience, including to radicalisation. This includes teaching pupils about the safe use of electronic equipment and the internet and the risks posed by adults or young people, who use the internet and social media to bully, groom, abuse or radicalise other people, especially children, young people and vulnerable adults. The School recognises that a "one size fits all" approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed. **Internet safety** (including when children are online at home) is an integral part of the School's ICT curriculum and also embedded in PSHE (known as LFL - Learning for Life) and Relationships Education and/or Relationships and Sex Education ("RSE").

The School has appropriate filters and monitoring systems in place to safeguard children from potentially harmful and inappropriate material online when using the School's IT system. The School's uses SENSO which enables filters to be applied both whilst at School and at home. Such systems aim to reduce the risk of children being exposed to illegal, inappropriate or harmful materials online (content risk); reduce the risk of children being subjected to harmful online interaction with others including commercial advertising and grooming (contact risk); restrict access to online risks such as online gambling, phishing or financial scams (commerce risk); and help manage online behaviour that can increase a child's likelihood of, or causes, harm for example making, sending and receiving explicit images. The School recognises however that children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G) which means that children may consensually and/or non-consensually share indecent images, sexually harass their peers via mobile and smart technology, and view and share pornography and other harmful content whilst at school undetected. Further detail of the School's policy and procedures in relation to online safety can be found in the School's E-Safety Policy.

We do not allow pupils to have mobile phones at school. If there is any need for a mobile phone, parents should contact the Deputy Head Pastoral and talk through the reason. Any phones which are allowed and brought into the school must be left with the school office until they go home. Pupils should not have smart watches or devices that can connect with the internet or mobile phones.

The School will liaise with parents to reinforce the importance of children being safe online and the systems the School uses to filter and monitor online use. Parents and carers are offered advice and guidance in support of identifying the risks that may be present to children online. Parents and carers will be made aware of what their children are being asked to do online when undertaking remote learning, including the sites they will be asked to access and who from the School their child is going to be interacting with online.

The school adheres to the DfE Filtering and Monitoring standards, and the Cyber Security Standards set out in KCSiE (2024). Our online safety mechanisms are reviewed annually.

### **Relationships Education AND/OR Relationships and Sex Education (“RSE”)**

Relationships Education AND/OR RSE has been compulsory since September 2020. The School had flexibility to decide how it discharged its duties within the first year of compulsory teaching. The School understands that preventative education is most effective in the context of a whole-school approach that prepares children for life in modern Britain and creates a culture of zero tolerance for sexism, misogyny/misandry, homophobia, biphobic, and sexual violence/harassment.

The School will have regard to the DfE’s statutory guidance *Relationships Education, Relationships and Sex Education (RSE) and Health Education* when making arrangements for and teaching Relationships Education AND/OR RSE.}

Relationships Education AND/OR RSE will form part of the School’s PSHE programme (known as LFL - Learning for Life, at St Francis.

### **A culture of listening to children**

We have a whole school approach to listening to children and have systems in place which create an environment where children feel safe to share their concerns and worries and know they will be taken seriously. These systems operate with the best interests of the child at their heart.

Children can safely express their views and give feedback. The school’s safeguarding team are clearly identifiable to our pupils. We regularly gather pupil voice via forums and surveys, this data informs our practice and policies.

### **Curriculum – teaching about safeguarding**

Our pupils access a broad and balanced curriculum (age and stage of development appropriate) that promotes their spiritual, moral, cultural, mental and physical development, and prepares them for the opportunities, responsibilities and experiences of life.

We provide opportunities for pupils to develop skills, concepts, attitudes and knowledge that promote their safety, and well-being. The PSHE and citizenship curriculum, incorporating Relationships, Sex and Health (RSHE) education specifically includes the following objectives:

- Developing pupil self-esteem and communication skills
- Developing strategies for self-protection including online safety

- Developing a sense of the boundaries between appropriate and inappropriate behaviour in adults and within peer relationships (positive relationships and consent)

Examples of topics:

- healthy and respectful relationships
- boundaries and consent
- stereotyping, prejudice and equality
- body confidence and self-esteem
- how to recognise an abusive relationship, including coercive and controlling behaviour
- the concepts of, and laws relating to-sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so called honour-based violence such as forced marriage and FGM, and how to access support, and
- what constitutes sexual harassment and sexual violence and why these are always unacceptable.

### **Remote learning**

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

The DSL will:

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

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

### **Looked after children**

The governing body ensures that staff have the skills, knowledge and understanding necessary to keep safe any children on roll who are looked after by a local authority.

The most common reason for children becoming looked after is as a result of abuse and/or neglect.

In particular, the Governors should ensure that appropriate staff have the information they need in relation to a child's looked after legal status (whether they are looked after under voluntary arrangements with consent of parents or on an interim or full care order) and contact arrangements with birth parents or those with parental responsibility. They should also have information about the child's care arrangements and the levels of authority delegated to the carer by the authority looking after him/her. The designated safeguarding lead should have details of the child's social worker and children in kinship care arrangements and the name of the virtual school head in the authority that looks after the child.

A previously looked after child potentially remains vulnerable and all staff should have the skills, knowledge and understanding to keep previously looked after children safe. When dealing with looked after children and previously looked after children, it is important that all agencies work together and prompt action is taken when necessary to safeguard these children, who are a particularly vulnerable group.

Rose Tomlin is the designated member of staff who has responsibility for their welfare and progress. The School ensures that the designated member of staff receives appropriate training in order to carry out their role.

### **Arrangements for visiting speakers**

The School has clear protocols for ensuring that any visiting speakers are appropriately supervised and suitable and full details are available in the Visiting Speaker Policy (B18). The School's responsibility to pupils is to ensure that they can critically assess the information they receive as to its value to themselves, and that the information is aligned to the ethos and values of the School and British values.

The School is required to undertake a risk assessment before agreeing to a Visiting Speaker being allowed to attend the School. This will take into account any vetting requirements considered appropriate in the circumstances and may include a DBS check if relevant.

Visiting speakers will be expected to understand that, where appropriate, their session should actively promote the British values of democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs and at no point undermine these. In some cases, the School may request a copy of the Visiting Speaker's presentation and/or footage in advance of the session being provided.

Visiting Speakers, whilst on the School site, will be supervised by a School employee.

- On attending the School, visiting speakers will be required to show original current identification documents including a photograph such as a passport or photo card driving licence.
- The School shall also keep a formal register of visiting speakers retained in line with its Data Protection Policy.

The School is used for non-school activities but this is always when there are no children on site. Should there be an occasion when pupils would be on site at the same time as a non-school activity a specific risk assessment would be undertaken in advance.

There are occasions when the Friends of St Francis run activities such as the Christmas Fair and on these occasions children are supervised by school staff and their parents.

Children taking part in off-site tuition, workshops or performances off the School campus are accompanied by the correct ratio of school staff:pupil. A risk assessment will be considered on each occasion.

## **EARLY YEARS PROVISION SAFEGUARDING ARRANGEMENTS**

### **Disqualification from working in childcare**

Due to the possibility that any member of St Francis School staff may be required to work in, or be involved in the management of, the School's early years or provision of care of pupils under the age of eight, the School will take steps to check whether those staff are disqualified under the Childcare Act 2006. These checks will be undertaken pre-appointment, and each September during employment. This forms part of the School's safer recruitment practices, further details of which can be found in the School's Recruitment and Selection Policy.

The School records all checks of staff employed to work in or manage relevant childcare on the Single Central Register. This includes the date disqualification checks were completed.

### **Non attendance**

We recognise the importance of regular attendance for the children here at Little Saints and record all non-attendance along with the reason, These are then reviewed monthly to look for any recurring patterns and if necessary followed up with the parent /carer.

If a child does not arrive at the normal time, staff will make contact to find out the reason for the absence or lateness .

### **Disqualification from Caring for Children (DUCA)**

Where a member of staff is found to be disqualified or if there is doubt over that issue then, pending resolution, the School will remove them from the work from which they are or may be disqualified. Suspension or dismissal will not be an automatic response; the School will consider if there is scope in principle to redeploy them with other age groups or in other work from which they are not disqualified, subject to assessing the risks and taking advice from the LADO when appropriate.

## **Use of mobile phones and cameras**

The School's policy on the use of mobile phones and cameras in the setting can be found in the Staff Code of Conduct Policy (A7), the E-Safety Policy (I6) and the Staff ICT Use Policy (I3).

Parents are not permitted to use their mobile phones or camera in or around the EYFS setting without prior approval from the Nursery Manager.

## **Arrival and Collection Policy (Nursery)**

Full details can be found on page 40 of Little Saints Policies and Procedures:

 [Little Saints Policies and procedures 2021.docx](#)

## **Oral Health**

Promotion of oral health in early years is linked to other areas already promoted, including self-care, healthy eating and physical development.

This is achieved through play with children about oral health and includes brushing the teeth of dolls or soft toys, reading stories about teeth and smiles and talking about healthy food and drinks that help to grow strong teeth. We will talk about tooth brushing with fluoride toothpaste as children arrive and give parents and carers knowledge and practical advice to support oral health at home.

Poor oral health can be an earlier indicator of safeguarding concerns.

## **DSL for the EYFS**

The practitioner designated to take lead responsibility for safeguarding children in the early years settings including Nursery can be found on the Key School Contact Details at the beginning of this policy.

### **Duty to notify Ofsted**

The School will inform Ofsted of any significant event which is likely to affect the suitability of any person who is in regular contact with children on the premises where childcare is provided. For example, where the School is satisfied that a person working in a relevant setting falls within one of the disqualification criteria. Any significant event must be notified to Ofsted as soon as reasonably practicable, but at the latest within 14 days of the date the School became aware (or ought reasonably to have become aware) of it. The School will notify Ofsted within 14 days of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere).



## **APPENDIX 1 –SIGNS AND TYPES OF ABUSE**

All School staff should be aware that abuse, neglect, exploitation and safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap with one another therefore staff should always be vigilant and always raise any concerns with the DSL (or DDSLs). All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the School and/or can occur between children outside of these environments. All staff, but especially the DSL and DDSLs, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual abuse (including harassment and exploitation), domestic abuse in their own intimate relationships (teenage relationship abuse), criminal exploitation, serious youth violence, county lines, and radicalisation. All staff should be aware that technology is a significant component in many safeguarding and wellbeing issues and should recognise that children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently online and in daily life. Staff should be aware that children can also abuse their peers online, this can take the form of abusive, harassing, and misogynistic/misandrist messages, the non-consensual sharing of indecent images, especially around chat groups, and the sharing of abusive images and pornography, to those who do not want to receive such content. In all cases, if staff are unsure, they should always speak to the DSL (or DDSLs).

**Physical abuse:** a form of abuse which may involve hitting, shaking, throwing, poisoning, burning, or scalding, drowning, suffocating or otherwise causing physical harm to a child (including through corporal punishment). Physical harm may also be caused when a parent or carer fabricates the symptoms of, or deliberately induces, illness in a child. Indicators of physical abuse include:

- Unexplained injuries, burns, bruises;
- Finger marks;
- Fear of undressing or medical help;
- Improbable explanations for injuries;
- Fear of returning home or parents being contacted; and
- Unexplained absence from school.

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

- Fear of new situations;

- Inappropriate emotional responses;
- Self harm;
- Reluctance to accept praise;
- Low self esteem;
- Lack of home support;
- Depressed and withdrawn;
- Social isolation – not joining in, and few friends.

**Sexual abuse:** involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet). Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Sexual abuse also includes sexual violence and sexual harassment (see below) which can occur between two children of any sex (also known as child on child abuse). This can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence are sexual offences under the Sexual Offences Act 2003, such as rape, sexual assault, and assault by penetration. Schools should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.

Indicators of sexual abuse include:

- Bruises;
- Scratches;
- Bite marks on the body;
- Persistent infections in the anal or genital area;
- Any sexual awareness inappropriate to child's age – shown in drawings, play, vocabulary;
- Frequent masturbation;
- Changes in behaviour;
- Refusal to stay with certain people;
- Self-harm;
- Depression;
- Low self-esteem;
- Pregnancy.

**Sexual harassment:** is 'unwanted conduct of a sexual nature' that can occur online and offline and both inside and outside of school. Sexual harassment is likely to violate a child's dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Sexual harassment can include sexual comments, such as telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names; sexual "jokes" or taunting; physical behaviour, such as deliberately brushing against someone, interfering with someone's clothes; or upskirting, and sharing of unwanted explicit content (for example displaying pictures, photos or drawings of a sexual nature); and online sexual

harassment, which might include consensual or non-consensual sharing of sexual images and videos (often referred to as the sharing of nudes/semi-nudes, or sexting – see below); inappropriate sexual comments on social media; exploitation; coercion and threats. Online sexual harassment may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. Further information can be found in the *SVSH* advice.

**Sexual violence:** refers to sexual offences under the Sexual Offences Act 2003, including rape, assault by penetration, sexual assault, and/or causing someone to engage in sexual activity without consent. Consent to sexual activity may be given to one sort of sexual activity, but not another, or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. A child under the age of 13 can never consent to any sexual activity. The age of consent is 16, and sexual intercourse without consent is rape.

**Child-on-child sexual violence and/or harassment:** Sexual violence and sexual harassment (as defined above) can occur between two children of any age and sex, from primary through to secondary stage and into colleges. It can occur through a group of children sexually assaulting or sexually harassing a single child or group of children. It is more likely that girls will be the victims of sexual violence and harassment, and it is more likely that it will be perpetrated by boys. It can however occur between children of any sex. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable. Children who are victims of sexual violence and/or sexual harassment wherever it happens, 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 or college. Further information can be found in the *SVSH* advice.

**Harmful sexual behaviour:** problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is “harmful sexual behaviour”. Harmful sexual behaviour can occur online and/or face-to-face and can also occur simultaneously between the two. Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years’ age difference, or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature. In line with managing internally, the school or college may decide that the children involved do not require referral to statutory services but may benefit from early help. Early help is support for children of all ages that improves a families resilience and outcomes or reduces the chance of a problem getting worse. Providing early help is more effective in promoting the welfare than reacting later.

**Sharing of nudes and/or semi-nudes:** the sending or posting of nude or semi-nude images, videos, or live streams online by young people under the age of 18. This could be via social media, gaming platforms, chat apps or forums. It could also involve sharing between devices via services like Apple’s AirDrop which works offline. The sharing of nudes and semi-nudes can happen publicly online, in 1:1 messaging or via group chats and closed social media accounts and may include images or footage of more than one child or young person.

Alternative terms used by children and young people may include 'dick pics' or 'pics' or may be referred to by adults or professionals as 'youth produced/involved sexual imagery', 'indecent imagery', 'image based sexual abuse' or 'sexting'.

The motivations for taking and sharing nude and semi-nude images, videos and live streams are not always sexually or criminally motivated. Such images may be created and shared consensually by young people who are in relationships, as well as between those who are not in a relationship. It is also possible for a young person in a consensual relationship to be coerced into sharing an image with their partner. Incidents may also occur where:

- children and young people find nudes and semi-nudes online and share them claiming to be from a peer
- children and young people digitally manipulate an image of a young person into an existing nude online
- images created or shared are used to abuse peers e.g. by selling images online or obtaining images to share more widely without consent to publicly shame

For this reason, incidents can either be classified as 'aggravated' or 'experimental'. The DDCMS / UKIS guidance "*Sharing nudes and semi-nudes: advice for education settings working with children and young people*" sets out the classification of incidents, and how each should be handled.

**Upskirting:** is a criminal offence and typically involves taking a picture under a person's clothing (not necessarily a skirt) without their permission and/or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. Anyone of any sex can be a victim.

**Neglect:** the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse. Once a child is born, neglect may involve a parent or carer failing to provide adequate food, clothing and shelter (including exclusion from home or abandonment); protect a child from physical and emotional harm or danger; ensure adequate supervision (including the use of inadequate care-givers); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs. Indicators of neglect include:

- Constant hunger;
- Poor personal hygiene;
- Inappropriate clothing;
- Frequent lateness and non attendance;
- Poor social relationships;
- Constant tiredness;
- Independent & street wise;
- No parental support for education; and
- Compulsive stealing or scrounging.

**Serious violence:** indicators which may signal that children are at risk from, or are involved with serious violent crime include increased absence from School, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a

significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation. Staff are trained to recognise both the early warning signs of contextual risks and that pupils may be susceptible. All staff should be aware of the associated risks which increase the likelihood of involvement in serious violence (for example, being male, frequent absence from school or permanently excluded from school, experienced child maltreatment or having been involved in offending) and understand the measures in place to manage these.

**Specific safeguarding issues:** All staff should have awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and/or alcohol misuse, unexplainable and/or persistent absences from education, serious violence (including that linked to county lines), radicalisation and consensual and non-consensual sharing of nude and semi-nude images and/or videos can be signs that children are at risk. Safeguarding issues can also manifest themselves via child on child abuse, such as abuse within intimate partner relationships, bullying (including cyberbullying), gender-based violence/sexual assaults, sexting and upskirting. Safeguarding issues can also be linked to, for example, children missing education; child sexual exploitation; domestic violence; fabricated or induced illness; faith abuse (including ostracism of families); female genital mutilation; forced marriage; gangs and youth violence; gender-based violence / violence against women and girls; hate; mental health; preventing radicalisation; relationship abuse; sexting; consensual and non-consensual sharing of nudes and semi-nudes; and trafficking.

**Child sexual exploitation (CSE):** CSE is a form of child sexual abuse (see above) which occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources.

The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur through the use of technology. CSE can affect any child or young person (male or female) under the age of 18 years (including 16 and 17 year olds who can legally consent to have sex) who has been coerced into engaging in sexual activities. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). Some children may not realise they are being exploited e.g. they believe they are in a genuine romantic relationship.

CSE can be a one-off occurrence or a series of incidents over time and range from opportunistic to complex organised abuse. It can involve force and/or enticement-based methods of compliance and may, or may not, be accompanied by violence or threats of violence.

The below CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends, and

- children who suffer from sexually transmitted infections, display sexual behaviours beyond expected sexual development or become pregnant.

The DfE has published guidance on this entitled "*Child sexual exploitation: guide for practitioners*". CSE may occur alone, or may overlap with CCE, and/or county lines, as well as other forms of abuse.

**Child criminal exploitation (CCE):** CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants (for example, money, gifts or affection), and/or (b) for the financial or other advantage (such as increased status) of the perpetrator or facilitator and/or (c) through violence or the threat of violence. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, sexual identity, cognitive ability, physical strength, status, and access to economic or other resources. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur through the use of technology.

CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see below), forced to shoplift or pickpocket. They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.

Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt. They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others. Children can be exploited by adult males or females, as individuals or in groups. They may also be exploited by other children, who themselves may be experiencing exploitation – where this is the case, their vulnerability as victims is not always recognised by adults and professionals (especially when they are older children). It is important in these circumstances that the child perpetrator is also recognised as a victim. Some of the following can be indicators of CCE:

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

The experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however staff should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation. CCE may occur alone, or may overlap with CSE, and/or county lines, as well as other forms of abuse.

Children who have been exploited will need additional support to help maintain them in education.

**County lines:** County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs, using dedicated mobile phone lines or other form of “deal line”.

This activity can happen locally as well as across the UK - no specified distance of travel is required. Children and vulnerable adults exploited to sell drugs and move and store drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are increasingly being targeted and recruited online using social media. Children can easily become trapped by this type of exploitation as county lines gangs can manufacture drug debts which need to be worked off or threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

A number of the ways of identifying indicators for CSE and CCE as detailed above may be applicable to where children are involved in county lines. Some additional specific indicators that may be present where a child is criminally exploited through involvement in county lines are children who:

- go missing and are subsequently found in areas away from their home;
- that have been the victim or perpetrator of serious violence (e.g. knife crime);
- are involved in receiving requests for drugs via a phone line, moving drugs, handing over and collecting money for drugs;
- are exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection;
- are found in accommodation that they have no connection with, often called a 'trap house or cuckooing' or hotel room where there is drug activity;
- owe a 'debt bond' to their exploiters;
- have their bank accounts used to facilitate drug dealing.

Further information on the signs of a child's involvement in county lines is available in guidance published by the Home Office.

**Modern Slavery:** Modern slavery encompasses human trafficking and slavery, servitude and forced or compulsory labour. Exploitation can take many forms, including sexual exploitation, forced labour, slavery, servitude, forced criminality and the removal of organs. Further information on the signs that someone may be a victim of modern slavery, the support available to victims and how to refer them to the National Referral Mechanism is available in the statutory guidance "*Modern slavery: how to identify and support victims (May 2022)*".

**Cybercrime:** is criminal activity committed using computers and/or the internet. It is broadly categorised as either 'cyber-enabled' (crimes that can happen off-line but are enabled at scale and at speed on-line) or 'cyber dependent' (crimes that can be committed only by using a computer). Cyber-dependent crimes include:

- unauthorised access to computers (illegal 'hacking'), for example accessing a school's computer network to look for test paper answers or change grades awarded;
- denial of Service (Dos or DDoS) attacks or 'booting'. These are attempts to make a computer, network, or website unavailable by overwhelming it with internet traffic from multiple sources; and,

- making, supplying, or obtaining malware (malicious software) such as viruses, spyware, ransomware, botnets, and Remote Access Trojans with the intent to commit further offence, including those above.

Children with particular skill and interest in computing and technology may inadvertently or deliberately stray into cyber-dependent crime.

If there are concerns about a child in this area, the DSL (or a deputy), should consider referring into the Cyber Choices programme. This is a nationwide police programme supported by the Home Office and led by the National Crime Agency, working with regional and local policing. It aims to intervene where young people are at risk of committing, or being drawn into, low level cyber-dependent offences and divert them to a more positive use of their skills and interests. Cyber Choices does not currently cover 'cyber-enabled' crime such as fraud, purchasing of illegal drugs on-line and child sexual abuse and exploitation, nor other areas of concern such as on-line bullying or general on-line safety.

Additional advice can be found at: Cyber Choices, 'NPCC- When to call the Police' and National Cyber Security Centre - NCSC.gov.uk.

**Mental health:** all staff should 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.

Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.

Where children have suffered abuse and neglect, or 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 staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy, and speaking to the DSL {or DDSL}.

The DfE has published advice and guidance on *Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools*. In addition, Public Health England has produced a range of resources to support secondary and senior school teachers to promote positive health, wellbeing and resilience among young people including its guidance *Promoting Children and Young People's Emotional Health and Wellbeing*. Its resources include social media, forming positive relationships, smoking and alcohol.

### **FGM and Honour Base Abuse**

**'Honour based' abuse:** encompasses crimes which have been committed to protect or defend the honour of the family and/or the community, including Female Genital Mutilation (FGM)], forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving



“honour” often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take.

Standard child safeguarding procedures apply and must always be followed in all cases where abuse or neglect is suspected including those that may be related to particular belief systems.

The number of cases of child abuse linked to a belief in spirits, possession and witchcraft is small, but where it occurs the impact on the child is great, causing much distress and suffering to the child. It is likely that a proportion of this type of abuse remains unreported. Research commissioned by the DfE in 2006 reviewed child abuse cases that had occurred between 2000 and 2005 to identify any cases where the abuse was linked to accusations of possession or witchcraft. 38 cases involving 47 children were found to be relevant and sufficiently well documented. The children came from a variety of backgrounds including African, South Asian and European.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/175437/Action\\_Plan\\_-\\_Abuse\\_linked\\_to\\_Faith\\_or\\_Belief.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/175437/Action_Plan_-_Abuse_linked_to_Faith_or_Belief.pdf)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. Guidance on the warning signs that FGM may be about to take place, or may have already taken place, can also be found on pages 38-41 of the Multi-agency statutory guidance on FGM. To give an example of indications that a girl has already been subjected to FGM:

- A pupil may have difficulty walking, sitting, or standing and may even look uncomfortable.
- A pupil may have frequent urinary, menstrual or stomach problems or spend longer than normal in the bathroom due to difficulties urinating.
- There may be prolonged or repeated absences from School and/or noticeable behaviour changes (e.g. withdrawal or depression) on the pupil’s return.
- A pupil is reluctant to undergo medical examination. If staff have a concern that a pupil may be at risk of FGM, they should speak to the DSL (or DSLs) who will (where appropriate) activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and Children’s Social Care.

There is a statutory duty on teachers to personally report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Unless the teacher has a good reason not to, they should still consider and discuss any such case with the DSL and involve children’s social care as appropriate. If the teacher is unsure whether this reporting duty applies, they should discuss their concerns with the DSL in accordance with this policy. Where a teacher suspects that a pupil is at risk (i.e. where the teacher does not discover that an act of FGM appears to have been carried out, either through disclosure by the victim or visual evidence), teachers should follow the School’s local safeguarding procedures. Further information can be found in the *Multi-agency statutory guidance on female genital mutilation and the FGM resource pack*, particularly section 13.]

**Forced marriage:**

Forcing a person into a marriage is a crime in England and Wales. 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.

Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their eighteenth birthday, even if violence, threats or another form of coercion are not used. As with the existing forced marriage law, this applies to non-binding, unofficial 'marriages' as well as legal marriages. Staff will inform the D/DSL immediately if they suspect a child is at risk of forced marriage.

Threats can be physical or emotional and psychological. A lack of full and free consent can be where a person does not consent or where they cannot consent (if they have learning disabilities, for example). Nevertheless, some communities use religion and culture as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage. There are a range of potential indicators that a child may be at risk of forced marriage, details of which can be found on pages 13-14 of the *Multi-agency guidelines: Handling cases of forced marriage*. Further information on forced marriage is available in guidance published by the Forced Marriage Unit. School staff can also contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

**Radicalisation:** Children may be susceptible to radicalisation into terrorism. Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. Extremism is vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs. It can also call for the death of members of the armed forces, whether in this country or overseas. Terrorism is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause. There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home). As with other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately, which may include making a Prevent referral. Designated safeguarding leads and other senior leaders should familiarise themselves with the Prevent duty guidance: for further education institutions in England and Wales. Staff should contact the DSL (or the DDSLs,) who should be aware of the local procedures in place, before making a Prevent referral. In the event of a child leaving, the DSL should consider if it would be appropriate to share any information with the new school or college. For example, information that would allow the new school or college to continue supporting victims of abuse or

those who are currently receiving support through the 'Channel' programme and have that support in place for when the child arrives at the new school.

**Special educational needs and/or disabilities (SEND), or pupils with certain health conditions:**

Pupils with SEND or certain health conditions can face additional safeguarding challenges. These children may not outwardly show signs of abuse and/or may have difficulties in communication about abuse or neglect, or bullying.

These can include:

- assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- these children being more prone to peer group isolation or bullying (including prejudice-based bullying) than other children
- the potential for children with SEND or certain medical conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- communication barriers and difficulties in managing or reporting these challenges
- cognitive understanding – being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges or the consequences of doing so.

**Lesbian, gay, bisexual, or gender questioning:** A child or young person being lesbian, gay, or bisexual is not in itself an inherent risk factor for harm. However, they can sometimes be targeted by other children. In some cases, a child who is perceived by other children to be lesbian, gay, or bisexual (whether they are or not) can be just as vulnerable as children who are.

However, the Case review identified that caution is necessary for children questioning their gender as there remain many unknowns about the impact of social transition and children may well have wider vulnerabilities, including having complex mental health and psychosocial needs, and in some cases additional diagnoses of autism spectrum disorder and/or attention deficit hyperactivity disorder.

It is recommended that when families/carers are making decisions about support for gender questioning children, they should be encouraged to seek clinical help and advice. When parents are supporting pre-pubertal children, clinical services should ensure that they can be seen as early as possible by a clinical professional with relevant experience.

As such, when supporting a gender questioning child, schools should take a cautious approach and consider the broad range of their individual needs, in partnership with the child's parents (other than in the exceptionally rare circumstances where involving parents would constitute a significant risk of harm to the child), including any clinical advice that is available and how to address wider vulnerabilities such as the risk of bullying. Schools should refer to our Guidance for Schools and Colleges in relation to Gender Questioning Children, when deciding how to proceed.

Risks can be compounded where children lack trusted adults with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and create a culture where they can speak out or share their concerns with members of staff.

**Domestic abuse:** The Domestic Abuse Act 2021 received Royal Assent on 29 April 2021. The Act introduces the first ever statutory definition of domestic abuse and recognises the impact of domestic abuse on children, as victims in their own right, if they see, hear, or experience the effects of abuse. The statutory definition of domestic abuse, based on the previous cross-government definition, ensures that different types of relationships are captured, including ex-partners and family members. The definition captures a range of different abusive behaviours, including but not limited to, psychological, sexual, physical, emotional, and economic abuse and coercive and controlling behaviour. Both the person who is carrying out the behaviour and the person to whom the behaviour is directed towards must be aged 16 or over and they must be “personally connected” (as defined in section 2 of the 2021 Act).

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, socio-economic status, sexuality or background and domestic abuse can take place inside or outside of the home. The government will issue statutory guidance to provide further information for those working with domestic abuse victims and perpetrators, including the impact on children.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Experiencing domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Young people can also experience domestic abuse within their own intimate relationships. This form of child on child abuse is sometimes referred to as ‘teenage relationship abuse’. Depending on the age of the young people, this may not be recognised in law under the statutory definition of ‘domestic abuse’ (if one or both parties are under 16). However, as with any child under 18, where there are concerns about safety or welfare, child safeguarding procedures should be followed and both young victims and young perpetrators should be offered support. The Act’s provisions, including the new definition, will be commenced over the coming months.

Domestic Abuse may lead to other safeguarding concerns and should therefore be managed under this policy. School staff can contact Operation Compass on 0204 513 9990 for advice in respect of children who have experienced domestic abuse.

**Homelessness:** Being homeless, or at risk of homelessness presents a real risk to a child's welfare. The School should be aware of potential indicators of homelessness including household debt, rent arrears, domestic abuse, and anti-social behaviour, as well as a family being asked to leave a property. If staff are made aware or suspect that a pupil may be at risk of homelessness they should talk to the DSL in the first instance. Whilst referrals to the Local Housing Authority should be

progressed as appropriate, and in accordance with local procedures, this does not and should not replace a referral to the LADO where a child has been harmed or is at risk of harm, in accordance with this policy.

**Children who are absent from school:** Children being absent from education for prolonged periods and/or on repeat occasions can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines. It is important the school or college's response to persistently absent pupils and children missing education supports identifying such abuse, and in the case of absent pupils, helps prevent the risk of them becoming a child missing education in the future. This includes when problems are first emerging but also where children are already known to local authority children's social care and need a social worker (such as a child who is a child in need or who has a child protection plan, or is a looked after child), where being absent from education may increase known safeguarding risks within the family or in the community.

A child going missing from School is a potential indicator of a range of safeguarding issues including abuse, neglect, sexual abuse, CSE and CCE. It may indicate mental health problems, risk of substance abuse, risk of travelling to conflict zones, risk of FGM, so-called 'honour'-based abuse or risk of forced marriage. Staff must follow the School's procedures for dealing with children who go missing, particularly persistently. The School's procedure for dealing with children who go missing can be found in the School's Missing Persons Policy (B9). All unexplained absences will be followed up in accordance with this Missing Persons Policy (B9).

The School shall inform the local authority of any pupil who is going to be added to or deleted from the School's admission register at non-standard transition points in accordance with the requirements of the Education (Pupil Registration) (England) Regulations 2006 (as amended). This will assist the local authority to:

- a) fulfil its duty to identify children of compulsory school age who are missing from education; and
- b) follow up with any child who might be in danger of not receiving an education and who might be at risk of abuse, neglect, or radicalisation.

School attendance registers are carefully monitored to identify any trends. The School will inform the local authority (and the local authority where the child is normally resident) of any pupil who fails to attend school regularly, or has been absent without the School's permission for a continuous period of 10 school days or more, at such intervals as are agreed between the School and the local authority.

Action should be taken in accordance with this policy if any absence of a pupil from the School gives rise to a concern about their welfare. The School's policy supports identification of abuse and provides preventative measures against the risk of the child going missing in the future. This applies when issues are first emerging as well as where children are already known to the local authority children's social care and need a social worker.

**Child abduction and community safety incidents:** Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by people known but not related to the victim (such as neighbours, friends, and acquaintances); and by strangers.

Other community safety incidents in the vicinity of a school can raise concerns amongst children and parents, for example, people loitering nearby or unknown adults engaging children in conversation.

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important they are given practical advice on how to keep themselves safe. Many schools provide outdoor-safety lessons run by teachers or by local police staff.

It is important that lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

Children and the court system: Children are sometimes required to give evidence in criminal courts, either for crimes committed against them or for crimes they have witnessed. There are two age appropriate guides to support children 5-11 year olds and 12-17 year olds available on the gov.uk website.

The guides explain each step of the process and support and special measures that are available. There are diagrams illustrating the courtroom structure and the use of video links is explained.

Making child arrangements via the family courts following separation can be stressful and entrench conflict in families. This can be stressful for children. The Ministry of Justice has launched an online child arrangements information tool with clear and concise information on the dispute resolution service. The School may refer some parents and carers to this service where appropriate. Children with family members in prison: Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. The National Information Centre on Children of Offenders (NICCO) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

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Note: Governing bodies should ensure DSL has the appropriate status and authority within the school to carry out the duties of the post. Annex C of KCSIE details the role and responsibilities of the DSL.

## Appendix 2

### What to do if you are worried a child is being abused or neglected for staff, volunteers and visitors in all agencies and settings



This flowchart is intended for use as a brief guide. Refer to the DfE Guidance [What to do if you are worried a child is being abused](#) for more information, definitions and possible indicators of abuse (including child sexual exploitation).

SVPP website: [www.wiltshiresvpp.org.uk](http://www.wiltshiresvpp.org.uk)

Reviewed: September 2023

## Appendix 3a

### Concern Form Part A

- **Part A** is to be completed by the adult who first has a concern and reported to the Designated Safeguarding Lead (DSL) without delay.  
Separate concern forms should be completed for both alleged instigator(s) and victim(s) of incidents.
- **Part B** is to be completed by the DSL

Child's name			
Date of birth <small>This may be added by the DSL having ensured there is no risk of confusion if children have similar names</small>			
Name of member of staff/person reporting the concern	PLEASE PRINT		
	Signature		
Role			
Date DD/MM/YYYY		Time	
Concern(s) - Use the body- map show any marks or injuries.			
Additional form used?		Yes / No	Page of



## Appendix 3b

### Concern Form Part B

To be completed by the Designated Safeguarding Lead (D/DSL)

Name of D/DSL reviewing the concern					
<b>Safeguarding support already in place</b>					
Tick and add name where known at time of report					
None	ESA or Support Assessment	Child in Need	Child Protection Plan	Looked After	Previous social care involvement
Name and role of allocated worker					
Data analysis: if the concern relates to child on child abuse, state which:		<i>This includes any reports and concerns, including those outside the school and online:</i> <ol style="list-style-type: none"> <li>1. bullying (including cyberbullying, prejudice-based and discriminatory bullying)</li> <li>2. abuse in intimate personal relationships between peers</li> <li>3. physical abuse</li> <li>4. sexual violence</li> </ol>		<ol style="list-style-type: none"> <li>5. sexual harassment</li> <li>6. causing someone to engage in sexual activity without consent</li> <li>7. consensual and non-consensual sharing of nudes and semi nudes images and or videos</li> <li>8. upskirting</li> <li>9. initiation/hazing type violence and rituals</li> </ol>	

Name of person taking actions	Actions/next steps Please detail conversation and rationale for decisions – include whether concerns were shared with parents/carers, MASH and if not outline reasons why.	Date of action

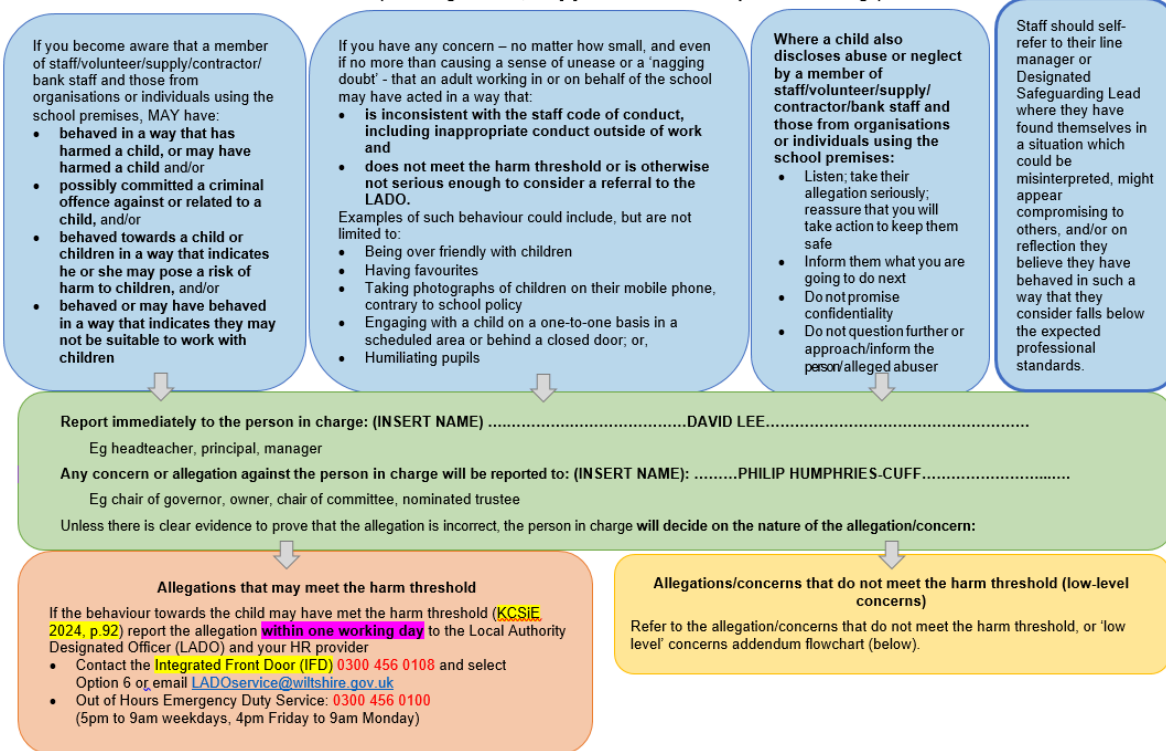
<b>What would the child like to happen next?</b>		
Has the child's wishes been considered when deciding action to be taken?	Yes	No
If no, please indicate why not		

A summary of actions must be shared with the person who raised the concern			
<p>Summary of action discussion - please include any 'gut feeling elements' in the discussion and also the potential impact on the child.</p>		Date	
<p>If actions agreed Signature of person (overleaf) who raised the concern</p>			
<p>If actions <i>not</i> agreed A file note added to the child's file with a summary of discussion and the outcome/s. Signature of person who raised the concern overleaf</p>		File note document number	

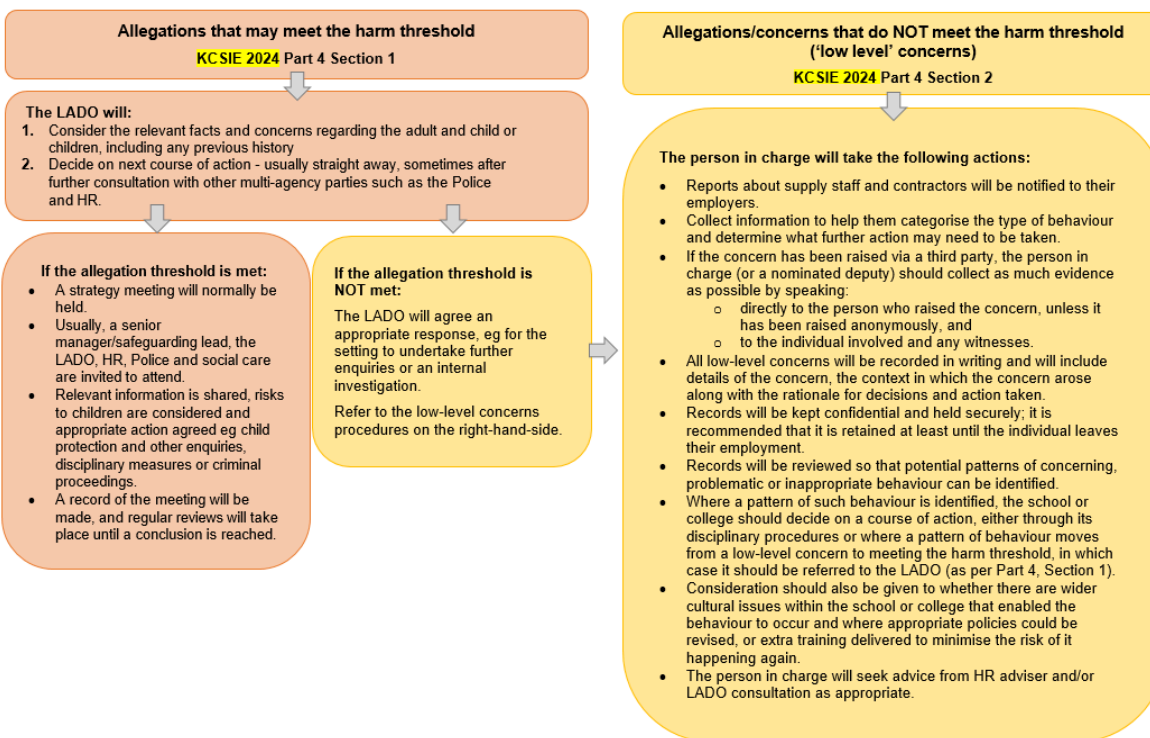
# Appendix 4



## Allegations and concerns against adults in education settings – July 2024 (including schools, early years and alternative provision settings)



## Allegation/concerns guidance for persons in charge – July 2024



## Appendix 5

### Low-Level Concern Form

Please use this form to share any concern – no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’ – that an adult may have acted in a way that:

- is inconsistent with St Francis School’s Staff Code of Conduct Policy, including inappropriate conduct outside of work, and
- does not meet the allegation threshold, or is otherwise not serious enough to consider a referral to the LADO.

You should provide a concise record – including brief context in which the low-level concern arose, and details which are chronological, and as precise and accurate as possible – of any such concern and relevant incident(s) (and please use a separate sheet if necessary).

The record should be signed, timed, and dated.

**Name of Staff Member:**

Department/Role:

**Details of concern** (please state any specific dates).

Name of referrer:

Signed:

Date:

Time:

**Received by:**

At: (time)

On: (Date)

**Context:** (include any historical information, for example, any previous low-level concerns, any LADO consultation, and or referrals).

**Action Taken:** (please specify, including rationale for action and outcome).

Signed:

This record will be held securely in accordance with St Francis School's low-level concerns policy which forms part of the School's Staff Code of Conduct Policy. Please note that low-level concerns will be treated in confidence as far as possible, but St Francis School may in certain circumstances be subject to legal reporting requirements or other legal obligations to share information with appropriate persons, including legal claims and formal investigations.

<b>Compiled by:</b> <i>Julie Thomas, HR Manager</i> <i>August 2022</i>		<b>Approval required by</b> <b>Governing Body</b>		<b>Review</b> <b>Responsibility</b> <b>lies with</b> <b>(Role)</b>	<b>Next Review</b> <b>due:</b>
<b>Reviewed by:</b>	<b>Date</b> <b>Reviewed:</b>	<b>Approved by:</b>	<b>Date</b> <b>Approved</b>		
Jonty Butler	22/08/2023	Governors	01/09/23	DSL	July 2025
Updates by:					
Jonty Butler	19/02/24				
Jonty Butler	12/07/24				