



# Safeguarding and Child Protection Policy

## Kisimul School Woodstock House

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## Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Kim McConnell	07826 871 290
Deputy DSL	Richard Burbage	07507 455 877
Surrey Children's SPA	Children's Referrals	0300 470 9100
Local authority designated officer (LADO)	Surrey LADO Service	0300 123 1650 LADO@surreycc.gov.uk
Acting Director of Education and Residential Services (Improvement)	Dom Cook	07969 336 572
Channel helpline		020 7340 7264

## 1. Aims

The school aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote child/young person / young people's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues

## 2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2020\)](#) and [Working Together to Safeguard Children/young people \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- Part 3 of the Schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children's Act 1989](#) (and [2004 Amendment](#)), which provides a framework for the care and protection of child/young person/young people
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory Guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children/young people
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children /young people
- [Statutory Guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Child/Young Person Care \(Disqualification\) and Child/Young Person Care \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the "2018 Children in Care Disqualification Regulations") and [Children's Care Act 2006](#), which set out who is disqualified from working with children/young people
- This policy also takes into account the Local Children's Safeguarding Partners procedures with Surrey by ensuring that DSLs follow local training pathways and are mindful of local processes and referral information.

### 3. Definitions

A detailed breakdown of definitions and symptoms of potential safeguarding concerns are outlined in Appendix 1 of this policy document.

**Safeguarding and promoting the welfare of children/young persons** means:

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

**Child Protection** is part of this definition and refers to activities undertaken to prevent children/young people suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child/young person, and may involve inflicting harm or failing to act to prevent harm. Appendix 1 explains the different types of abuse.

**Neglect** is a form of abuse and is the persistent failure to meet a child/young person's basic physical and/or psychological needs, likely to result in the serious impairment of the child/young person's health or development. Appendix 1 defines neglect in more detail.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children/ young people

**Child** includes everyone under the age of 18. Given the vulnerable nature of our young people, vigilance and application should be applied for those YP over 18 in respect of this policy and adult safeguarding referrals should be made accordingly.

**Child criminal exploitation (CCE), and Child Sexual Exploitation (CSE)** are forms of abuse, where an individual or groups takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity.

**Contextual safeguarding** means that all staff should be aware that safeguarding incidents can be associated with factors outside school and/or can occur between children outside of this environment. Staff should consider whether children could be at risk of abuse outside their families (e.g. sexual exploitation, criminal exploitation, serious youth violence).

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

- › The local authority (LA)
- › A clinical commissioning group for an area within the LA
- › The chief officer of police for a police area in the LA area

### 4. Equality statement

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

We give special consideration to children/young people who:

- › Have special educational needs (SEN) or disabilities (see section 9), by ensuring they have personalised plans that take account of their specific needs and presentation
- › Are young carers
- › May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- › Have English as an additional language
- › Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- › Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- › Are asylum seekers
- › Are at risk due to either their own or a family member's mental health needs
- › Are looked after or previously looked after

## 5. Roles and responsibilities

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

### 5.1 All staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education](#), and review this guidance at least annually. A breakdown of definitions of safeguarding and related abuse is outlined in the Annex 1 to this policy, referring to the categories of abuse outlined in KCSIE 2020 main body of text and that document's Annex A of additional information.

All staff will be aware of:

- › Our systems which support safeguarding, including this child/young person protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children/young people who go missing from education.
- › The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- › The process for making referrals to local authority children/young people's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- › What to do if they identify a safeguarding issue or a child/young person tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- › The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.
- › Identifying the impact of mental health as a safeguarding concern for the well-being of young people, specifically 'preventing the impairment of children's mental and physical health or development' (KCSIE 2020)

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

### 5.2 The designated safeguarding lead (DSL)

The DSL and deputies are members of the senior leadership team. The DSL takes lead responsibility for child/young person protection and wider safeguarding.

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

When the DSL is absent, the deputies will act as cover.

If the DSL and deputies are not available, Care DSLs and deputies will act as cover.

Contact details for DSLs are outlined at the beginning of this policy and in appendix 5.

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

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

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

The full responsibilities of the DSL and deputies are set out in their job description.

### 5.3 The board of directors

The board of directors will approve this policy at each review, ensure it complies with the law and hold the headteacher to account for its implementation.

The board of directors will appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full board of directors. This is always a different person from the DSL.

The Acting Director of Education and Residential Services will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All directors will read Keeping Children Safe in Education.

Section 13 has information on how directors are supported to fulfil their role.

## 5.4 The headteacher

The headteacher is responsible for the implementation of this policy, including:

- › Ensuring that staff (including temporary staff) and volunteers are informed of our systems which support safeguarding, including this policy, as part of their induction.
- › Communicating this policy to parents when their child/young person joins the school and via the school website.
- › Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
- › Ensuring that all staff undertake appropriate safeguarding and child/young person protection training and update this regularly.
- › Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

## 6. Confidentiality

Kisimul is mindful of the following principles in respect of confidentiality and safeguarding:

- › Timely information sharing is essential to effective safeguarding
- › Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children/young people
- › The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children/young people safe
- › If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child/young person at risk.
- › Staff should never promise a child/young person that they will not tell anyone about a report of abuse, as this may not be in the young person's best interests
- › The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- › If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- › Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

## 7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue. Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

### 7.1 If a child/young person is suffering or likely to suffer harm, or in immediate danger

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

Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.

If a member of education staff has a concern about actual or potential abuse of a child/young person, they should report it to the DSL or deputy as soon as possible. There should be no delay in reporting issues, unless to do so would leave a child/young person unsupervised or in a vulnerable position.

The DSL or deputy should determine whether or not the child/young person needs medical attention and that their immediate welfare is considered with priority.

### 7.2 If a child/young person makes a disclosure to you

If a child/young person discloses a safeguarding issue to you, you should:

- › Listen to and believe them. Allow them time to talk freely and do not ask leading questions.
- › Stay calm and do not show that you are shocked or upset.
- › Tell the child/young person /they have done the right thing in telling you. Do not tell them they should have told you sooner.

- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child/young person's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children/adults social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so.

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

The Department for Education's Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".

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

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

**Any teacher** who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a **pupil under 18** must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

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

It has been agreed that regulated professionals with this duty will do the following in Surrey:

- Call 101, outlining that this is an FGM referral reporting under the mandatory reporting duty, and providing the necessary information requested.
- Further information can be found at:

<https://surreyscb.procedures.org.uk/hkphh/procedures-for-specific-circumstances/female-genitalmutilation>

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

Figure 1 on page 10 illustrates the procedure to follow if you have any concerns about a child/young person's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to any member of the senior leadership team and/or take advice from local authority child / adult social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000.

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

#### Early Help

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

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

Anyone who has contact with children can make an early help referral to Surrey Early Help Advisor by calling 0300 470 9100 (Children's Single Point of Access) or emailing [cspa@surreycc.gov.uk](mailto:cspa@surreycc.gov.uk)

Further information can be found at:

<https://surreyscb.procedures.org.uk/hkphh/procedures-for-specific-circumstances/female-genitalmutilation>

## Referral

If it is appropriate to refer the case to local authority child/adult social care or the police, the DSL will make the referral or support you to do so.

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

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

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

Where a member of staff is concerned that worries or agreed actions regarding a child/young person are not being addressed or acted upon in a timely and consistent manner, it is expected that the Surrey practitioner resolution and escalation protocol should be used to reach a satisfactory outcome that is in the best interests of the child/young person. This can be found at <https://surreyscb.procedures.org.uk/sktp/complaints-and-disagreements/inter-agency-escalation-policy-andprocedure/>

## 7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority child / adult social care. Make a referral to local authority child / adults social care directly, if appropriate (see 'Referral' above). Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include [Channel](#), the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children / adults social care team.

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

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

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

## 7.6 Concerns about a staff member or volunteer

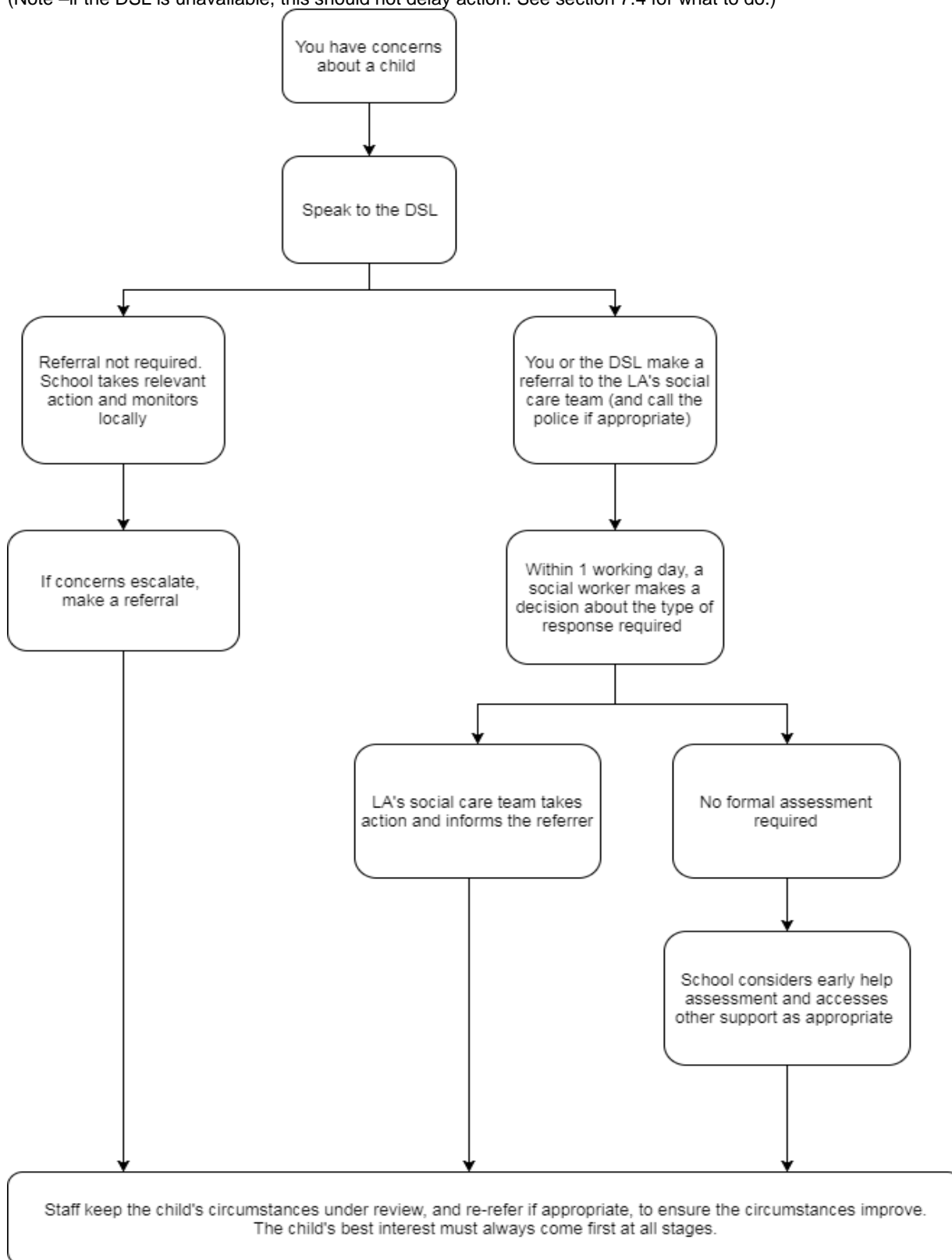
If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to child/young person, speak to the headteacher. If the concerns/allegations are about the headteacher, speak to the Acting Director of Education and Residential Services.

The headteacher / Acting Director of Education and Residential Services will then follow the procedures set out in appendix 3, if appropriate.

You should also use this procedure when allegations are made against supply staff, even if they are employed by an agency.

**Figure 1: Procedure if you have concerns about a child/young person’s welfare (as opposed to believing a child/young person is suffering or likely to suffer from harm, or in immediate danger)**

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



**Click here for Surrey Partnership Working Pathways and Referrals**  
<https://www.surreyscp.org.uk/>



## 7.7 Allegations of abuse made against other pupils

We recognise that child / young people are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”.

We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys’ perpetrators). However, all peer-on-peer abuse is unacceptable and will be taken seriously. Most cases of pupils hurting other pupils will be dealt with under our school’s behaviour policy, but this child/young person protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

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

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

- › You must record the allegation and tell the DSL, but do not investigate it
- › The DSL will contact the local authority child / young people’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- › The DSL will put a risk assessment and support plan into place for all child / young people involved (including the victim(s), the child / against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- › The DSL will contact the child / young people and adolescent mental health services (CAMHS), if appropriate

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

- › Challenging any form of derogatory or sexualised language or behaviour, including requesting or sending sexual images
- › Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- › Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- › Ensuring pupils know they can talk to staff confidentially by providing suitably symbolised information so that this is accessible to young people
- › Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child/young person is being abused themselves, and that this would fall under the scope of this policy

## 7.8 Sexting

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

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

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

### Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- › Whether there is an immediate risk to pupil(s).
- › If a referral needs to be made to the police and/or social care.
- › If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed).
- › What further information is required to decide on the best response.
- › Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown).

- › Whether immediate action should be taken to delete or remove images from devices or online services.
- › Any relevant facts about the pupils involved which would influence risk assessment.
- › If there is a need to contact another school, college, setting or individual.
- › Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)
- › If the young person is over 18 and in education, the same thresholds should apply in respect of determining safeguarding concerns in respect of sexting within Kisimul given the vulnerability and SEN of our young people.

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

- › The incident involves an adult
- › There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- › What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- › The imagery involves sexual acts and any pupil in the imagery is under 13
- › The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

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

#### **Further review by the DSL**

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks. If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to social care and/or the police immediately.

#### **Informing parents**

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

#### **Referring to the police**

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

#### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

#### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting in a way that is meaningful for children/young people with special educational needs and/or disabilities as part of our PSHE education. Teaching covers the following in relation to sexting:

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

Pupils also learn the strategies and skills needed to manage:

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

## **8. Notifying parents/carers**

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

Other staff will only talk to parents/carers about any such concerns following consultation with the DSL.

If we believe that notifying the parents/carers would increase the risk to the child/young person, we will discuss this with the local authority relevant social care team before doing so.

In the case of allegations of abuse made against other children /young people, we will normally notify the parents/carers of all the individuals involved.

## 9. Pupils with special educational needs and disabilities

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

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child/young person's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

## 10. Mobile phones and cameras

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

For further information, see the staff code of conduct and the group's GDPR policy.

## 11. Complaints and concerns about school safeguarding policies

### 11.1 Complaints against staff

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

### 11.2 Whistle-blowing

Kisimul has a whistleblowing policy that can be found on the school's website. This outlines what you should do if you have any concerns about the application of safeguarding procedures within school. The group's whistleblowing number is **0800 313 4338**. The NSPCC whistleblowing advice line is **0800 028 0285**.

## 12. Record-keeping

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL. Non-confidential records will be easily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

If a child/young person for whom the school has, or has had, safeguarding concerns moves to another school, the DSL will ensure that their child/young person protection information is forwarded promptly and securely, and separately from the main pupil file. In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child/young person.

While it is usually good practice to seek consent for making any referral, there are some exceptions when it comes to safeguarding concerns. For example, you do not need consent if having a conversation with the family would place the child/young person or someone else at increased risk of suffering harm. There is no need to seek consent if doing so might undermine the investigation of a serious crime. This includes making a child protection referral for a child/young person who has made an allegation about a physical or sexual assault by a parent or carer, or where a delay in getting consent may mean the child/young person is put at further risk of harm.

There may be occasions, such as criminal investigation or Local Authority proceedings, which require an element of confidentiality from the family involved. Any professional ambiguity should be clarified with the relevant agency to ensure that investigations or proceedings are not compromised. For further advice about information sharing please go to:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## 13. Training

### 13.1 All staff

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

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

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

Contractors who are provided through a private finance initiative (PFI) or similar contract will also receive safeguarding training.

Volunteers will receive appropriate training, if applicable.

### 13.2 The DSL and deputies

The DSL and deputies will undertake child/young person protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

### 13.3 Directors

All directors receive information about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

The assistant directors of education may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher.

### 13.4 Recruitment – interview panels

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

## 14. Monitoring arrangements

This policy will be reviewed **annually** by the director of education. At every review, it will be approved by the full board of directors.

## 15. Links with other policies

This policy links to the following policies and procedures:

- Behaviour policy education
- Anti-bullying policy
- SEN and inclusion policy
- Staff code of conduct policy
- Complaints policy
- Health and safety policy
- Health and safety on educational visits policy
- Supporting pupils with medical conditions
- Attendance policy
- Online safety policy
- Equality and diversity
- Sex and relationship policy
- First aid policy
- Curriculum policy
- Whistleblowing policy

These appendices are based on the Department for Education's statutory guidance, **Keeping Children Safe in Education 2020**.

## Appendix 1: types of abuse and specific safeguarding issues

### Indicators of abuse and neglect

**Abuse:** 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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others. Abuse can take place wholly online, or technology may be used to facilitate offline abuse. Children may be abused by an adult or adults or by another child or children.

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

**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 from participating in normal social interaction. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

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

**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, for example, 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.

**Safeguarding issues** . All staff should have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking, alcohol abuse, deliberately missing education and sexting (also known as youth produced sexual imagery) put children in danger.

**Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)** . Both CSE and CCE are forms of abuse and both occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into sexual or criminal activity. 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. In some cases, the abuse will be in exchange for something the victim needs or wants and/or will be to the financial benefit or other advantage (such as increased status) of the perpetrator or facilitator. The abuse can be perpetrated by individuals or groups, males or females, and children or adults. The abuse 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. Victims can be exploited even when activity appears consensual and it should be noted exploitation as well as being physical can be facilitated and/or take place online.

**Peer on peer abuse** All staff should be aware that children can abuse other children (often referred to as peer on peer abuse). This is most likely to include, but may not be limited to:

- bullying (including cyberbullying);
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm;
- sexual violence, such as rape, assault by penetration and sexual assault;
- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be stand-alone or part of a broader pattern of abuse;
- 

**Upskirting**, which typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

**Sexting (also known as youth produced sexual imagery)**; and • initiation/hazing type violence and rituals. All staff should be clear as to the school's or college's policy and procedures with regards to peer on peer abuse.

**Serious violence** 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, 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.

### **So-called 'honour-based' violence (including FGM and forced marriage)**

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

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

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

### **FGM**

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

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl:
  - Having difficulty walking, sitting or standing, or looking uncomfortable
  - Finding it hard to sit still for long periods of time (where this was not a problem previously)
  - Spending longer than normal in the bathroom or toilet due to difficulties urinating
  - Having frequent urinary, menstrual or stomach problems
  - Avoiding physical exercise or missing PE
  - Being repeatedly absent from school, or absent for a prolonged period
  - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
  - Being reluctant to undergo any medical examinations
  - Asking for help, but not being explicit about the problem
  - Talking about pain or discomfort between her legs

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

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

➤ A girl:

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

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

### **Forced marriage**

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

**Mental Health** All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. 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 other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education

If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following their child protection policy and speaking to the designated safeguarding lead or a deputy.

**County lines** is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line".

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence

(including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, pupil referral units, special educational needs schools, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked for the purpose of transporting drugs. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of availability of local services/third sector providers who offer support to victims of county lines exploitation.

**Domestic abuse** The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass, but is not limited to: psychological; physical; sexual; financial; and emotional. 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. Exposure to domestic abuse and/or violence can have a serious, long lasting emotional and psychological impact on children. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Operation Encompass operates in the majority of police forces across England. It connects the police with schools to ensure better outcomes for children who are subject to or witness police attended incidents of domestic abuse.

**Preventing radicalisation** Children are vulnerable to extremist ideology and radicalisation. Similar to protecting children from other forms of harms and abuse, protecting children from this risk should be a part of a schools' or colleges' safeguarding approach.

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

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

**Terrorism** is an action that endangers or causes serious violence to a person/people; causes serious damage to property; or seriously interferes or disrupts an electronic system. The use or threat must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious or ideological cause.

**The Prevent duty** All schools and colleges are subject to a duty under section 26 of the Counter Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of their functions, to have "due regard to the need to prevent people from being drawn into terrorism". This duty is known as the Prevent duty. The Prevent duty should be seen as part of schools' and colleges' wider safeguarding obligations. Designated safeguarding leads and other senior leaders should familiarise themselves with the revised Prevent duty guidance: for England and Wales, especially paragraphs 57-76, which are specifically concerned with schools (and also covers childcare).

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

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



- Possessing extremist literature
- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

**Channel** is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn into terrorism. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all

**Peer on peer/ child on child abuse** Children can abuse other children. This is generally referred to as peer on peer abuse and can take many forms. This can include (but is not limited to): abuse within intimate partner relationships; bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm; sexting and initiation/hazing type violence and rituals.

**Sexual violence** It is important that school and college staff are aware of sexual violence and the fact children can, and sometimes do, abuse their peers in this way. When referring to sexual violence we are referring to sexual violence offences under the Sexual Offences Act as described on page 93 of KCSIE 2020

**Sexual harassment** When referring to sexual harassment we mean 'unwanted conduct of a sexual nature' that can occur online and offline. When we reference sexual harassment, we do so in the context of child on child sexual harassment. Sexual harassment is likely to: violate a child's dignity, and/or make them feel intimidated, degraded or humiliated and/or create a hostile, offensive or sexualised environment. Staff should refer to KCSIE page 93/94 for behaviour that could be deemed as being denoted as sexual harassment,

**Upskirting** The Voyeurism (Offences) Act, which is commonly known as the Upskirting Act, came into force on 12 April 2019. 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm. It is a criminal offence. Anyone of any gender, can be a victim.

### **Children/young people missing from education**

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

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

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

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

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

If a staff member suspects that a child/young person is suffering from harm or neglect, we will follow local safeguarding procedures, including with respect to making reasonable enquiries. We will make an immediate referral to the local authority social care team, and the police, if the child/young person is suffering or likely to suffer from harm, or in immediate danger.

### **Homelessness**

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

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

Where a child/young person has been harmed or is at risk of harm, the DSL will also make a referral to social care.

## Appendix 2: safer recruitment and DBS checks – policy and procedures

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

### New staff

When appointing new staff, we will:

- › Verify their identity
- › Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below).
- › Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- › Verify their mental and physical fitness to carry out their work responsibilities
- › Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- › Verify their professional qualifications, as appropriate
- › Ensure they are not subject to a prohibition order if they are employed to be a teacher or are involved in teaching work
- › Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- › Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

We will ask for written information about previous employment history and check that information is not contradictory or incomplete.

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children/young people.

**Regulated activity** means a person who will be:

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

### Existing staff

If we have concerns about an existing member of staff's suitability to work with children/young people, we will carry out all the relevant checks as if the individual was a new member of staff. We will also do this if an individual moves from a post that is not regulated activity to one that is.

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

- › We believe the individual has engaged in [relevant conduct](#); or
- › The individual has received a caution or conviction for a relevant offence, or there is reason to believe the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or
- › The 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- › The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

## Agency and third-party staff

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

## Contractors

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

- › An enhanced DBS check with barred list information for contractors engaging in regulated activity
- › An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children/young people

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

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

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

## Trainee/student teachers

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

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

## Volunteers

We will:

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

## Directors

All directors will have an enhanced DBS check without barred list information.

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

The CEO will have their DBS check countersigned by the secretary of state.

All directors and education managers will also have the following checks:

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

### **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

### **Adults who supervise pupils on work experience**

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

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

### **Pupils staying with host families**

Where the school makes arrangements for pupils to be provided with care and accommodation by a host family to which they are not related (for example, during a foreign exchange visit), we will request enhanced DBS checks with barred list information on those people.

Where the school is organising such hosting arrangements overseas and host families cannot be checked in the same way, we will work with our partner schools abroad to ensure that similar assurances are undertaken prior to the visit.

## Appendix 3: allegations of abuse made against staff

This section of this policy applies to all cases in which it is alleged that a current member of staff or volunteer has:

- › Behaved in a way that has harmed a child/young person, or may have harmed a child/young person, or
- › Possibly committed a criminal offence against or related to a child/young person, or
- › Behaved towards a child/young person in a way that indicates he or she would pose a risk of harm

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

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

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

### Suspension

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

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

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

### Definitions for outcomes of allegation investigations

- › **Substantiated:** there is sufficient evidence to prove the allegation
- › **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- › **False:** there is sufficient evidence to disprove the allegation
- › **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- › **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

### Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the headteacher (or assistant director where the headteacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- › Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or child/young person social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children/young people or there is evidence of a possible

criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)

- › Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or social care services, where necessary). Where the police and/or child / adults social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- › Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children/ young people at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or social care services, as appropriate
- › **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- › **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- › **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or social care services as appropriate
- › Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. A 24 hour helpline from Health Assured is available to all employees as part of the employee assistance programme on **0800 030 5182**.
- › Inform the parents or carers of the child/young person involved about the allegation as soon as possible if they do not already know (following agreement with social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- › Keep the parents or carers of the child/young person involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- › Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child/young person, or if the individual otherwise poses a risk of harm.

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

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

## Timescales

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

## Specific actions

### Action following a criminal investigation or prosecution

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

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

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

### Individuals returning to work after suspension

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

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

### Unsubstantiated or malicious allegations

If an allegation is shown to be deliberately invented, or malicious, the headteacher, or other appropriate person in the case of an allegation against the headteacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

## Confidentiality

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

The case manager will take advice from the local authority's designated officer, police and child / young people's social care services, as appropriate, to agree:

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

## Record-keeping

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

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

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



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

## References

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

## Learning lessons

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

This will include consideration of (as applicable):

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

## Appendix 4: specific safeguarding issues

### Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification.

Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

### Non-collection of children/young people

If a child/young person is not collected at the end of the session/day, we will:

- Ensure that they are appropriately supervised and reassured
- Contact parents/carers to arrange collection
- Refer to social services if no contact can be made
- Keep a record of any occurrences and potential safeguarding issues

### Missing pupils

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. Each pupil has a set of protocols that identify key risks in relation to their presenting behaviour and also outline key information which is easy to hand should there be an instance where they abscond or go missing in education.

## Appendix 5: contact details

### Safeguarding Contact Details

#### Designated Safeguarding Leads for Kisimul School Woodstock House - Education



DSL  
Kim McConnell  
Acting Headteacher  
07483 062 260



Richard Burbage  
Deputy DSL  
Assistant Headteacher  
07507 455 877

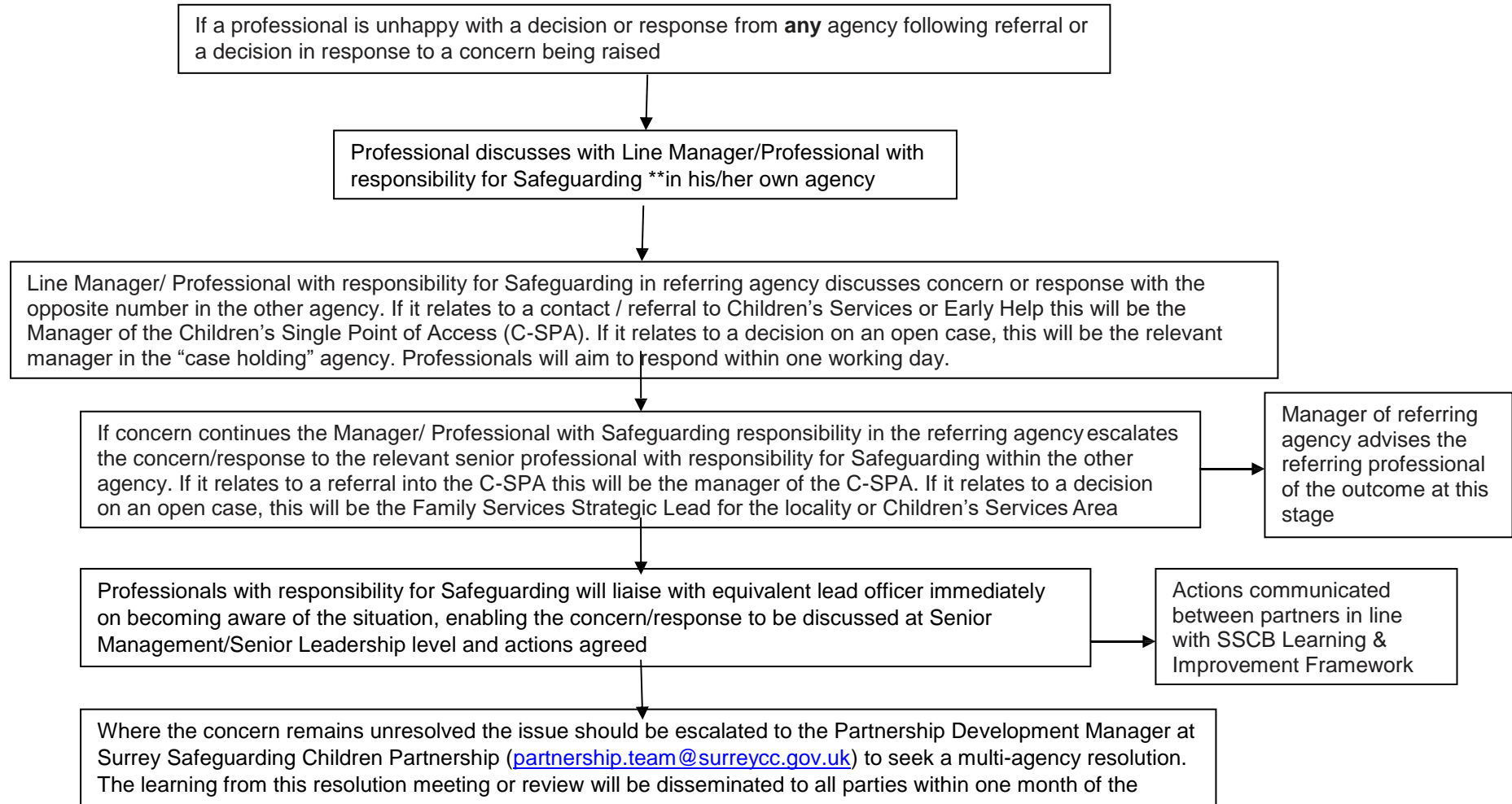
**Surrey Children's SPA  
Adult Services  
Emergency Duty Team  
LADO  
Channel Helpline  
Whistleblowing Helpline**

#### Local Safeguarding Contact Details

0300 470 9100  
0300 470 9100  
01483 517898  
0300 123 1650  
020 7340 7264  
0800 313 4338



## Inter-Agency Escalation Procedure for Professionals with Child Welfare Concerns



**\*\*** The job title and job description of the professional with safeguarding responsibility within an organisation will vary between partner agencies. Individual organisations should ensure that as part of their induction training employees are aware of who to contact to discuss a safeguarding concern or where to seek advice/supervision. It is anticipated that escalation concerns will be handled as a priority and within seven of initial receipt. If the concerns are urgent and a child is at risk of Serious Harm contact Surrey C-SPA on 0300 470 910, (if out of hours the Emergency Duty Team on 01483 517898) or Police on 999

020 73407264