Safeguarding Policy

Intent:

This Policy aims to inform everyone of the various types of risks children are faced with and the process that can be followed to help protect them.

This policy applies to all Staff, Volunteers, Directors (Governors) and Visitors to the school. We recognise that child protection is the responsibility of all adults at Wolfdale School. Child protection is at the forefront of Wolfdale School and is underpinned throughout this policy. The systems and processes operate with the best interests of the child, keeping the child at the heart of Wolfdale School.

We will ensure that all parents and other working partners are aware of our child protection policy by mentioning it in our school prospectus, displaying appropriate information in our reception and on the school website, and by raising awareness at meetings with parents as appropriate.

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1 – Outline

At Wolfdale School we recognise that Safeguarding and promoting the welfare of children is everyone's responsibility. Those responsible include families, carers, school staff and practitioners.

Keeping Children Safe in Education (September 2023) identifies Safeguarding and promoting the welfare of children as:

- protecting children from maltreatment
- preventing impairment of children's mental and physical health or development
- ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- taking action to enable all children to have the best outcomes
- children include everyone under the age of 18

This Policy has been written using guidance including:

- Keeping Children Safe in Education (September 2023)
- Guidance for safer working practice for those working with children and young people in education settings (May2019)
- The Prevent Duty Departmental advice for schools and childcare providers (June 2015)

This policy is consistent with the legal duty to safeguard and promote the welfare of children, as described in section 175 of the Education Act 2002 [or section 157 of the Education Act 2002 for independent schools and academies] and the statutory guidance "Keeping children safe in education – Statutory guidance for schools and colleges", September 2023 and "Working Together to Safeguard Children", 2018.

Governing bodies and proprietors should be aware of their obligations under the Human Rights Act 1998, the Equality Act 2010, (including the Public Sector Equality Duty), and their local multi-agency safeguarding arrangements.

Human Rights Act

The Human Rights Act 1998 (HRA) sets out the fundamental rights and freedoms that everyone in the UK is entitled to and contains the Articles and protocols of the European Convention on Human Rights (ECHR) (the Convention) that are deemed to apply in the UK. It compels public organisations to respect and protect an individual's human rights when they make individual decisions about them.

Under the HRA, it is unlawful for schools and colleges to act in a way that is incompatible with the Convention. The specific convention rights applying to schools and are:

- Article 3: the right to freedom from inhuman and degrading treatment (an absolute right)

- Article 8: the right to respect for private and family life (a qualified right) includes a duty to protect individuals' physical and psychological integrity
- Article 14: requires that all of the rights and freedoms set out in the Act must be protected and applied without discrimination
- Protocol 1, Article 2: protects the right to education.

Being subjected to harassment, violence and or abuse, including that of a sexual nature, may breach any or all of these rights, depending on the nature of the conduct and the circumstances.

Further information (including on absolute and qualified rights and Equality Act 2010) can be found at Human Rights | Equality and Human Rights Commission https://equalityhumanrights.com/en

Equality Act 2010

Schools and colleges have obligations under the Equality Act 2010. According to the Equality Act, schools and colleges must not unlawfully discriminate against pupils because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics).

Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools in relation to safeguarding and promoting the welfare of children, it is important that students develop their understanding of particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race. This is delivered through the schools PSHE curriculum.

Provisions within the Equality Act allow schools to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting pupils or students with a particular protected characteristic in order to meet their specific need, this includes a duty to make reasonable adjustments for disabled children and young people, including those with long term conditions.

The children at Wolfdale School all have Education Health & Care Plans which identifies individual diagnosis of difficulties and/or disabilities including ASD, ADHD, Anxiety, Communication Difficulties & Social Emotional Mental Health. All children regardless of their diagnosis have the right to be protected from abuse.

The children at the school have a heightened vulnerability as many have difficulties:

- Communicating feelings
- Communicating experiences
- Recognising risk including socially unacceptable behaviours/attitudes
- Social interactions

In addition, it is important to recognise that some children often display behaviours, including when in anxiety and crisis, that may be similar with signs of abuse such as:

- Isolation
- Verbal Aggression
- Physically Aggressive
- Use of socially inappropriate language

It is vital that when supporting the children at the school, such behaviours are not ignored or seen as ‘that’s them’ attitude. Staff should report behaviours and changes in line with schools Behaviour Policy. If staff have any concerns regarding a child, they must report it to a DSL.

All staff should be aware that children may not feel ready or know how to tell someone that they are being abused, exploited, or neglected, and/or they may not recognise their experiences as harmful. For example, children may feel embarrassed, humiliated, or being threatened. This could be due to their vulnerability, disability and/or sexual orientation or language barriers. This should not prevent staff from having a professional curiosity and speaking to the DSL if they have concerns about a child. It is also important that staff determine how best to build trusted relationships with children and young people which facilitate communication.

At Wolfdale school, all students are encouraged to share concerns with trusted staff. Where it is identified that a student may have a specific need including LGBTQ or Trauma related experiences, an identified safe staff will be allocated for the student to seek, however can speak to any staff they feel secure with.

For the children at the school the behaviours associated with their difficulties can often be:

- traits of perpetrators where there is an expression of control over environments or actions
- traits of victims where they struggle to recognise unacceptable social behaviours being ‘easily led’

Through the individual behaviours being identified in PSPs, responses are advised in addition with recording of concerns for the Inclusion team to review actions which may include referral for therapeutic support. The outcome of such interventions gives guidance to staff through responses or through their curriculum programme.

This Policy aims to inform of the various types of risks children are faced with and the process that can be followed to help protect them.

Our school will therefore:

- Establish and maintain an ethos where children feel secure and are encouraged to talk and are listened to.

- Ensure that children know that there are adults in the school whom they can approach if they are worried or are in difficulty.
- Include in the curriculum, activities and opportunities for PSHE/Citizenship/Relationships Education, Relationships and Sex Education and Health Education which equip children with the skills they need to stay safe from abuse (including online and other contexts children are in), and to know to whom they can turn for help.
- Ensure every effort is made to establish effective working relationships with parents and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out and recorded on the single central record for new staff and volunteers who will work with children, including identity, right to work, enhanced DBS criminal record and barred list (and overseas where needed), references, and prohibition from teaching or managing in schools (s.128) etc.

Staff at Wolfdale School must report all concerns of welfare to a Designated Safeguarding Lead (DSL) free of:

- Prejudice
- Pre-conceived notions of families and environment
- Pre-conceived notions of the child

Role	Name	Contact
• Principal • School lead for Safeguarding • Designated Safeguarding Lead (DSL)	Sachin (Sunny) Dogra	Sachin.dogra@wolfdaleschool.leics.sch.uk 0116 235 5600
• Head of School • Deputy DSL (dDSL)	Amy McMurray	amy.mcmurray@wolfdaleschool.leics.sch.uk 0116 235 5600
• Head of School • Deputy DSL (dDSL)	Daniel McMurray	daniel.mcmurray@wolfdaleschool.leics.sch.uk 0116 235 5600
• Head of School • Deputy DSL • (dDSL)	Jade Robinson	Jade.robinson@wolfdaleschool.leics.sch.uk 0116 265 5600
• SENCO • Deputy DSL (dDSL)	Charleigh Keemer	charleigh.keemer@wolfdaleschool.leics.sch.uk 0116 235 5600

• Director • Deputy DSL (dDSL)	Gemma Thompson	Gemma.thompson@wolfdaleschool.leics.sch.uk 0116 235 5600
Data and Exams Officer • Deputy DSL (dDSL)	Stephanie Lowe	stephanie.lowe@wolfdaleschool.leics.sch.uk 0116 235 5600

Concerns regarding child's welfare must be communicated to any of the named DSL's above.

All Staff, in particular DSL and dDSL, must consider all the factors inside and outside the school when reviewing information. KCSIE (2023) identifies Contextual Safeguarding which requires all 'to consider whether wider environmental factors are present in a child's life that are a threat to their safety and/or welfare'. Ensuring the whole picture is explored and understood allows for all evidence and information to be in place when reviewing concerns.

The DSL complete compulsory, external safeguarding training which enables them to investigate concerns raised and:

- Take all steps identified in this policy to ensure child's safety
- Communicate/liaise with relevant external services including Early Help, First Response, CAMHS and Allegations Officer
- Communicate/liaise with relevant internal teams including Inclusion, Therapy, SENCO, Curriculum, HR and Directors
- Deliver Safeguarding training to all staff to support them in recognising the various risks children are faced with along with the manner which they can report it.

Further Contacts

Department	Name	Contact
Head of Service Safeguarding and Performance Service	Kelda Claire	0116 3059084 / 07507686100
LADO / Allegations:	Kim Taylor Lovona Brown Shellie Miskella	0116 305 4141 cfs-lado@leics.gov.uk
Safeguarding Development Officers		educationeffectiveness@leics.gov.uk
First Response		Telephone1: 0116 3050005 Email: childrensduty@leics.gov.uk

Children's Duty (Tier 4 Same-day referrals)		Address First Response Children's Duty Room 100b County Hall Championship Way Glenfield LE3 8RF
All other referrals including Early Help (Children & Family Wellbeing) Service http://lrsb.org.uk/childreport **Early Help queries and Consultation Line:** 0116 305 8727		

If staff feel they cannot share the concerns with any of the DSLs above, they can contact the NSPCC's dedicated helpline is available as an alternative route for staff who do not feel able to raise concerns regarding child protection failures internally or have concerns about the way a concern is being handled by the school.

Staff can call 0800 028 0285 – line is available from 8:00 AM to 8:00PM, Monday to Friday and email: help@nspcc.org.uk

Keeping Children Safe in Education 2023 Part 1 and Annex A is available here and hard copies are available on request.

2 - Early Help

A key risk for the children at the school would be a failure to recognise the signs of abuse or neglect. The ideal is for 'Prevention' by creating an environment where staff and children feel safe and secure to communicate. If the early signs are recognised there is the opportunity for the school to offer support such as meeting with relevant staff, signposting to local support services and, with permission, access Early Help services.

Early Help aims to provide support at the earliest points to help families, carers and children. It is important that assessments consider the risks of harm outside the home on contextual safeguarding such as relationships that children form in their neighbourhoods, schools and online which can feature violence and abuse.

The NSPCC outline:

Early help services can be delivered to parents, children or whole families, but their main focus is to improve outcomes for children. For example, services may help parents who are living in challenging circumstances provide a safe and loving environment for their child. Or, if a child is displaying risk-taking behaviour, early help practitioners might work with the child and their parents to find out the reasons for the child's behaviour and put strategies in place to help keep them safe.

Staff can make Early Help referrals themselves if they have had permission from the family/carer. If this occurs staff must inform the DSL. They would be required to fill in an online Multi Agency Referral Form (MARF).

Early Help (Leicestershire)	0116 305 8727
Early Help (Leicester City)	0116 454 1004

Together to Safeguard Children (July 2018) identifies all staff should be alert to the potential need for Early Help for children, including the those at the school who have special educational needs, along with a child who:

- is disabled and has specific additional needs
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan)
- is a young carer
- is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
- is frequently missing/goes missing from care or from home
- is at risk of modern slavery, trafficking or exploitation
- is at risk of being radicalised or exploited
- 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 a privately fostered child

The following information is from the NSPCC website https://learning.nspcc.org.uk/safeguarding-child-protection/early-help-early-intervention :

Early Help can take many forms, such as:

- home visiting programmes
- school-based programmes
- mentoring schemes

(EIF, 2018).

Early help services should be part of a continuum of support which enables practitioners to respond to the different levels of need children and families may experience (DfE, 2018).

It's important that Early Help services are holistic, looking at the wider needs of the family and how to provide appropriate support.

Why Early Help is important

Early Help can offer children the support needed to reach their full potential (EIF, 2018). It can improve the quality of a child's home and family life, enable them to perform better at school and support their mental health (EIF, 2018).

Research suggests that early help can:

- protect children from harm
- reduce the need for a referral to child protection services
- improve children's long-term outcomes

(Haynes et al, 2015).

Early Help can also support a child to develop strengths and skills that can prepare them for adult life (EIF, 2018).

Identifying a child or young person who may benefit from Early Help

Signs that a child or young person may benefit from Early Help include:

- displaying disruptive or anti-social behaviour
- being bullied or bullying others
- having poor attendance at school
- being involved in, or at risk of, offending
- having poor general health
- having anxiety, depression or other mental health issues
- misusing drugs or alcohol
- having a particularly challenging relationship with parents or appearing to be unusually independent from their parents
- experiencing difficulties at home, such as domestic abuse, parental substance abuse or parental mental health problems
  (Department for Education (DfE), 2018).

Some groups of children may be more likely to need Early Help than their peers. These include children who:

- have been excluded from school
- have special educational needs
- are disabled
- are in care
- are leaving or preparing to leave care
- are young carers
- are young parents (or about to become young parents)
- are experiencing housing issues
  (DfE, 2018)

Recording concerns

It's important to record any concerns you may have about a child, to build up an overview of the child's lived experience so patterns of potentially abusive behaviour can be identified. These records should be shared with your nominated child protection lead who will consider all the available information and decide whether a referral to the local child protection services is necessary.

How to make a referral for Early Help

If you think a child, young person or a family might benefit from early help services, you should:

- keep a written record of your concerns
- inform your nominated child protection lead.

You can also contact the NSPCC Helpline on 0808 800 5000 or by emailing help@nspcc.org.uk Our trained professionals will talk through your concerns and give you expert advice.

Keeping a written record

If you think that a child, young person or a family might benefit from early intervention services write down the reasons why you think this type of support could be helpful. It's important to keep a written record of any concerns you have about a child.

Sharing your concerns

You should share your concerns with your nominated child protection lead. They will look at all the available evidence and decide what to do.

If the DSL thinks a child may be at risk of abuse or neglect, they will follow your organisation's child protection procedures immediately.

If they think the child and their family may benefit from co-ordinated support from more than one agency, they can request an Early Help assessment.

An Early Help assessment is where a lead practitioner (such as a GP, family support worker, school nurse, teacher, health visitor, and/or special educational needs co-ordinator) makes an assessment of the child's needs. It can only happen with the consent of the child (if they are able to give consent) and their parent or carer.

Working with the child and their family

The DSL will discuss things with the child and their family.

When talking to families that may benefit from Early Help, it is important to:

- be patient and calm. Listen carefully to the child and parent/carer and let them describe the challenges they are facing. Don't try to investigate or

quiz the child or parent/carer, but make sure you understand what they're saying
- find out what the child/family would like to happen. Ask what they would like to improve about the situation
- use non-judgmental language
- reassure the child/family that they can get support to move forward with their life
- agree on next steps with the child/young person and family.

The DSL must guide all conversations with the child and the child's family.

Having a collaborative approach is key to making sure children and families receive the right help at the right time. We will work proactively with other organisations to identify children and families in need of support and help them access the services they need.

Schools as relevant agencies, should be part of discussions with statutory safeguarding partners to agree the levels for the different types of assessment and services to be commissioned and delivered, as part of the local arrangements.
Safeguarding partners should publish a local threshold document which includes the process for the local early help assessment and the type and level of early help services to be provided, and DSLs (and their deputies) will need to familiarise themselves with this document.

2.1 – Operation Encompass

Operation Encompass operates in all police forces across England. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when the police are called to an incident of domestic abuse, where there are children in the household who have experienced the domestic incident, the police will inform the key adult (usually the designated safeguarding lead (or deputy) in school before the child or children arrive at school the following day.

This ensures that the school has up to date relevant information about the child's circumstances and can enable immediate support to be put in place, according to the child's needs. Operation Encompass does not replace statutory safeguarding procedures. Where appropriate, the police and/or schools should make a referral to local authority children's social care if they are concerned about a child's welfare. More information about the scheme and how schools can become involved is available on the Operation Encompass website.

Operation Encompass provides an advice and helpline service for all staff members from educational settings who may be concerned about children who have experienced domestic abuse.

Operation Encompass	8AM to 1PM, Monday to Friday on **0204 5139990** (charged at local rate). https://www.operationencompass.org/

3 - Signs of Abuse and Neglect

When creating an environment for staff to be responsive it is vital that it is understood that signs of abuse often crossover and any recognition of signs should be reported as a concern to the DSL. Such signs include:

- physical marks
- changes in behaviour, heightened or reduced
  changes in physical appearance
- lack of personal hygiene
- lack of nutrition
- non-attendance
- self-harm, self-injury
- isolation
- sexualised behaviours
- low self-esteem
- comments linked to illegal activity
- radical beliefs – including a sudden change and progressive change, stereotypes of race and culture

There are various risks and types of abuse the students may be victim to.

Abuse is defined as 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.

Abusers could include peers, people the child knows and people the child does not know. Abuse can occur at home, school, community and online.

Risks of abuse identified throughout the policy do not always involve physical contact they also include the use of technology. The use of social media, messaging services and gaming highlight a risk to many children. The schools e-safety policy highlights the school's position, but it is important to remember the risks technology can pose include:

- messaging comments to make others feel low or create an imbalance of power
- grooming
- inappropriate image/video sharing
- radicalisation
- group messaging including exclusion of individuals

4 - Physical Abuse

A child who is a victim of physical 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. This links to Fabricated Induced Illness (FII) where close monitoring of non-attendance and reasons would be explored.

5 - Emotional Abuse

A child who is exposed to the persistent emotional maltreatment that causes severe and adverse effects on the child's emotional development.

This includes an environment where a child is left to feel:
- a lack of worth
- a lack of love
- inadequate
- only feel valued for meeting the needs of another person
- picked on for their personality, interests or mannerisms
- unable to achieve or meet expectations
- overprotected or restricted from experiences
- not having opportunities to express their views
- being silenced
- made 'fun of' by their communication
- bullied or frightened to complete activities including online

Many of the children at Wolfdale School have social emotional difficulties along with ASD or ADHD. Such difficulties include traits of low self-esteem and difficulties interacting socially.

Through initial assessments of students which include review of EHCP, parent/carer meeting and school visits allow for a picture to be made on areas including matters such as this. The school offer wellbeing and therapeutic sessions which allow for such areas of difficulties to be worked on and approaches to support shared.

Domestic Abuse

Domestic abuse can encompass a wide range of behaviours and may be a single incident or a pattern of incidents. That abuse can be, but is not limited to, psychological, physical, sexual, financial or emotional. Children can be victims of domestic abuse. They may see, hear, or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse). All of which can have a detrimental and long-term impact on their health, well-being, development, and ability to learn.

6 - Sexual Abuse

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. Whether or not the child knows or not they are involved in sexual activity it is still abuse, this does not always include the application of violence and can occur with another adult or peer.

Sexual activities include:

- Assault by penetration including rape or oral sex
- Non-penetrative acts such as kissing, masturbating, upskirting
- Non-contact such as looking at or sharing sexual images or activities
- Grooming a child in preparation for abuse (including via the internet)

6.1 - Sexual Harassment

When referring to sexual harassment we mean ‘unwanted conduct of a sexual nature’ that can occur online and offline. This is also about peer-on-peer sexual harassment.

Sexual harassment is likely to: violate a child’s dignity, and/or make them feel intimidated, degraded, or humiliated and/or create a hostile, offensive or sexualised environment. Whilst not intended to be an exhaustive list, sexual harassment can include:

- 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
- displaying pictures, photos or drawings of a sexual nature

6.2 - Online Sexual Harassment

This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence. It may include:

- consensual and non-consensual sharing of nudes and semi-nude images and/or videos
- sexualised online bullying
- unwanted sexual comments and messages, including, on social media
- sexual exploitation
- coercion and threats
- upskirting

6.3 - Responding to Harmful Sexual Behaviour

Sexual violence and sexual abuse can happen anywhere, and all staff working with children are advised to maintain an attitude of '**it could happen here'**. Schools and colleges should be aware of and respond appropriately to all reports and concerns about sexual violence and/or sexual harassment both online and offline, including those that have happened outside of the school.

At Wolfdale the designated safeguarding lead (or deputy) is likely to have a complete safeguarding picture and be the most appropriate person to advise on the initial response by the school.

Important considerations will include:

• the wishes of the victim in terms of how they want to proceed. This is especially important in the context of sexual violence and sexual harassment. Victims should be given as much control as is reasonably possible over decisions regarding how any investigation will be progressed and any support that they will be offered. This will however need to be balanced with the school's duty and responsibilities to protect other children

• the nature of the alleged incident(s), including whether a crime may have been committed and/or whether HSB has been displayed

• the ages of the children involved

• the developmental stages of the children involved

• any power imbalance between the children. For example, is/are the alleged perpetrator(s) significantly older, more mature, confident, and well-known social standing? Does the victim have a disability or learning difficulty?

• if the alleged incident is a one-off or a sustained pattern of abuse (sexual abuse can be accompanied by other forms of abuse and a sustained pattern may not just be of a sexual nature)

• that sexual violence and sexual harassment can take place within intimate personal relationships between children

• importance of understanding intra familial harms and any necessary support for siblings following incidents

• are there ongoing risks to the victim, other children, adult students, or school staff

• other related issues and wider context, including any links to child sexual exploitation and child criminal exploitation.

7 - Neglect

Concerns of this nature link to 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)
- access to appropriate medical care or treatment
- neglect of, or unresponsiveness to, a child's basic emotional needs

At Wolfdale School we recognise the difficulties many families and carers are faced with. As a school we work collaboratively with both families and carers to understand the relationships and behaviours at home. This is vital to give us an insight into home lives of our students to ensure the best working relationship.

Having contact with families and carers allows for potential signs of stress from families and carers to be recognised, which can often be a contributing factor of abuse and/or neglect allowing for preventive measures to be put in place such as access to food through the day, access to staff for advice in support methods at home or through contacting Early Help.

If the DSL felt there was an immediate concern to the child's safety, they would contact First Response or Police, staff with concerns can directly contact these departments.

8- Child on child

All staff should be aware that children can abuse other children (often referred to as peer-on-peer abuse). The types of abuse identified above can occur between peers including:

- bullying (including cyberbullying, prejudice-based and discriminatory bullying)
- abuse in intimate personal relationships between peers.
- physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse).
- sexual violence, such as rape, assault by penetration and sexual assault; (this may include an online element which facilitates, threatens and/or encourages sexual violence)

- sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- consensual and non-consensual sharing of nudes and semi nudes' images and or videos (also known as sexting or youth produced sexual imagery).
- upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element).

All staff should understand, that even if there are no reports in the schools it does not mean it is not happening, it may be the case that it is just not being reported. As such it is important if staff have any concerns regarding peer-on-peer abuse, they should report to the DSL or Deputy DSL.

At the school, the children often display behaviours difficulties in anxiety and crisis which may often appear to be targeted to other children. Individual Positive Support Plans will identify if such responses are common for the child and responses are given.

Such behaviours regardless of diagnosis are not acceptable and staff should always make a record of such behaviours. The school adopt a reflection process to encourage them to learn from actions taken to make better choices in the future.

Child on child abuse can take the form of Bullying which is referred to in the Anti-Bullying Policy as, "Behaviour by an individual or a group, usually repeated over time that intentionally hurts another individual either physically or emotionally" (DfE "Preventing and Tackling Bullying", March 2014), staff report concerns of the victim and perpetrator direct to a DSL.

Students at Wolfdale school are vulnerable to Peer-on-Peer abuse as many seek to make friendships and have difficulties recognising behaviours that most would recognise as inappropriate such as:

- peers offering items
- peers changing their approaches i.e., sometimes close, sometimes distant
- peers dictating choices
- peers influencing choices
- physical behaviours such as being close, brushing past each other
- physical touch of clothing

It is essential that all staff understand the importance of challenging inappropriate behaviours between peers, that are abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boys being boys” can lead to:

- a culture of unacceptable behaviours
- an unsafe environment for children and
- in worst case scenarios a culture that normalises abuse leading to children accepting it as normal and not coming forward to report it.

As a school we must take a ‘Zero Tolerance’ view and approach when addressing and reporting concerns of peer-on-peer abuse.

Many of the children find difficulties in expressing themselves even if they are upset by comments from a ‘friend’. Staff should report concerns of communication to a DSL.

It is recognised there is a risk of peer-on-peer abuse occurring outside the ‘school gates’ including cyber abuse. Incidents that occur outside the school will be addressed in accordance with the Behaviour Policy, ***Discipline beyond the school gates*** and the schools Anti Bullying Policy and the Safeguarding Policy.

In addition to this such abuse between peers can occur through online forums whether social media or gaming. Many of our students game online with one another which can result in fall out. The school encourage students to share any concerns to family/carers or staff at the school.

If staff are made aware of any online concerns through student or parent disclosure, they must report to the DSL immediately.

The school curriculum incorporates Personal Safety and a development in what is socially acceptable behaviours between different relationships including friendships.

Child on child abuse can include sexual violence and sexual harassment, “upskirting”, initiation/hazing type violence, all forms of bullying, aggravated sexting, which includes the consensual and non-consensual sharing of nudes and semi-nudes images and/or videos and physical violence experienced by both boys and girls. However, child on child abuse is more likely to be perpetrated by boys on girls.

8.1 - Harmful Sexual Behaviour (HSB)

It 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. 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 is never acceptable.

Harmful sexual behaviour in schools: a briefing on the findings, implications and resources for schools and multi-agency partners, June 2020 identified the range of behaviours including:

- Sexist or homophobic name calling and bullying
- Sexual comments in person and on social media directed at students (such as 'slag', 'sket', 'hoe', 'bitch' and 'slut')
- Rumours about other students' sexual activity
- Rating students (predominantly directed at girls in relation to attractiveness, but also "*how much of a sket she is*" (Site Y, Focus Group, Student); and rating male students around masculinity/aggressive behaviour)
- Controlling behaviour in relationships, including pressure from partners to share social media passwords and to take down images they didn't like
- Pressure to send sexual photos by another student – predominantly aimed at girls
- Sexual imagery shared on social media without consent. When asked which social media platform images were shared on, 42% of students who said that sexual imagery was shared on social media without consent cited Snapchat and 27% cited Instagram. Other means by which students said students shared sexual images without consent included: pornhub, anonymous apps, the internet, USB sticks, and 'Bait outs' – online pages where students are invited to share sexual imagery, gossip and videos of other students)
- Inappropriate or unwanted touching or groping – predominantly touching of bums in school
- Pressure to perform sexual acts, particularly fellatio and masturbation
- Sexual bullying, harassment and pressure
- Self-harm (as a result of sexual pictures being shared with other students)

It is important that all staff understand that such behaviours can be perpetrated by boys or girls however, it is more likely that girls will be the victims of sexual violence and sexual harassment and more likely it will be perpetrated by boys.

Children who are victims of HSB will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be intensified if the alleged perpetrator(s) attends the school. It is important that staff are aware such incidents can be linked with relationships outside the school including those of an intimate nature.

HSB can take various forms between peers, and it is important that staff take a 'zero-tolerance' approach with children regarding this. It is vital that the school responds appropriately to such behaviours to prevent problematic, abusive and/or violent behaviour in the future.

8.2 - Upskirting

Child on child abuse can take the form of sexual abuse as identified above. Recent updates have identified Upskirting as a criminal offence and is defined as:

'…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. It is now a criminal offence' (KCSIE, September 2023)

8.3 - Response to Child-on-Child Abuse

Child on child abuse could include sexual violence and sexual harassment, "upskirting", initiation/hazing type violence, all forms of bullying, aggravated sexting which includes the consensual and non-consensual sharing of nudes and semi-nudes images and/or videos and physical violence experienced by both boys and girls. However, child on child abuse is more likely to be perpetrated by boys on girls.

The school will respond to such events using *Sexual violence and sexual harassment between children in schools and colleges May 2018* as a guide. Further information can be found https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf

It is essential that all victims are reassured that they are being taken seriously, regardless of how long it has taken them to come forward, and that they will be supported and kept safe. Abuse that occurs online or outside of the school should not be downplayed and should be treated equally seriously.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report. It is important to explain that the law is in place to protect children and young people rather than criminalise them, and this should be explained in such a way that avoids alarming or distressing them. The school will reassure that all victims are being taken seriously, regardless of how long it has taken them to report the incident and they will be supported and kept safe.

Steps the school will take:

- All actions will be recorded and stored electronically.
- Assess the victims wishes where reasonable give them as much control in guiding the process.
- Where there has been a crime or harm the school will access relevant external services including Police or Social Care.
- Access Early Help where appropriate to have collaborative working to offer support for parties involved.
- School to complete a Risk Assessment to identify safest methods to continue placement for the victim and perpetrator this will also include the risk factors

to the remainder of the school children and staff. This will be shared with the relevant families/carers and collaborative partners, if applicable.

- The school will create a Protection Plan for the Perpetrator and Victim. This will be shared with the relevant families/carers and collaborative partners, if applicable.
- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

8.4 – Relationships and Sex Education (RSE)

Due to our increasingly complex world, both on and offline, our students are presented with opportunities but also challenges and risk. Our students need to understand and be able to keep themselves safe and healthy and manage themselves appropriately to achieve personally, socially, and academically.

"The Relationships Education, Relationships and Sex Education and Health Education (England) Regulations 2019, made under sections 34 and 35 of the Children and Social Work Act 2017, make Relationships and Sex Education (RSE) compulsory for all pupils receiving secondary education. (Department for Education, July 2020).

Parents do have the right to request that their child be withdrawn from some or all of the Relationships and Sex education (RSE) delivered as part of statutory RSE.

<u>What is Relationship and Sex Education?</u>

Relationship and Sex Education (RSE) aims to teach students about sex and the health aspects of a sexual relationship, as well as the social, emotional and physical aspects of growing up and having relationships

The aims of Relationships and Sex and Education RSERSE) at Wolfdale are to:

- Ensure that learners are able to keep healthy and safe.
- To reduce the risk of learners becoming victims of child sexual exploitation.
- Ensure access for all to quality RSE at a level appropriate to their individual needs.
- Provide a safe and supportive environment in which sensitive discussions can take place.
- Prepare learners for puberty and give them an understanding of sexual development and the importance of health and hygiene.
- Help pupils to develop feelings of self-respect, confidence and empathy.
- Create a positive attitude and culture around issues of sexuality and relationships.
- Explore the links with alcohol and substance misuse and enabling learners to make informed choices.
- Reduce the proportion of learners displaying risk taking behaviours.

What is the intent of Relationship and Sex education (RSE) at Wolfdale School?

We have a duty to our students to ensure that they are all equipped with the knowledge of healthy relationship as well as educating them on the facts about sex. Further to this, many of our students are vulnerable and lack social understanding and this can cause a barrier to them in this aspect of their lives. Therefore, it is Wolfdale's aim to ensure our students are taught the knowledge and laws around sex and relationships to keep themselves and others safe.

Our RSE programme will be set out into three main elements:

Attitudes and Values:

- Learning the value and importance of relationships
- Learning the value of respect for others
- Exploring, considering and understanding moral dilemmas.
- Critical thinking in decision making

Personal and social skills:

- Managing their emotions
- Developing self-respect and empathy for others
- Learning an appreciation of consequences
- Managing conflict
- Recognising and avoiding abuse and exploitation

Knowledge and Understanding:

- Learning and understanding physical development
- Learning and understanding sexuality, reproduction, sexual health, contraception, emotions and relationships
- Learning about the avoidance of unplanned pregnancy

Implementation of RSE at Wolfdale School

RSE is taught to each student during the spring term in their PSHE lessons. Using the guidance from the PSHE association lessons are planned around key areas of RSE such as consent, types of relationships, puberty, sexual activity and sexual health (see appendix A) PSHE frameworks. These lessons are differentiated in terms of key stage to ensure the content and resources are age appropriate. Some students may be referred for discreet bespoke lessons due to safeguarding or other reasons associated with their learning difficulties.

The Impact of RSE at Wolfdale School

As with PSHE the impact of RSE at Wolfdale can be measured and viewed in different ways. Our intent to ensure that students are aware of abuse can be measured through our safeguarding and incident statistics, whereas their understanding of relationships can be measured through their AET targets.

Qualitatively it is hoped that the impact will be seen through students' positive relationships and through the confidence and trust they have in the teachers to ask questions about sex and relationships.

Religion and Belief

At Wolfdale School we aim to build positive and informative relationships with all of our students and their families and gain a thorough understanding of their religion and beliefs. Developing relationships with local faith groups and communities will enable us to teach subject areas constructively and effectively.

9 – CCE, Serious Violence, Missing in Education, County Lines, CSE, FGM, Forced Marriage

Children are at risk of exploitation whether it is through extremism, violence, gangs, serious crimes or child sex exploitation. At Wolfdale School children are at risk of this due to the nature of their diagnosis, life experiences and lack of risk awareness.

9.1 - 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, 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.

All staff should be aware of the range of risk factors which increase the likelihood of involvement in serious violence, such as:

- being male
- having been frequently absent or permanently excluded from school
- having experienced child maltreatment
- having been involved in offending, such as theft or robbery
- family history of criminal activity

Preventing Youth Violence and Gang Involvement	https://www.gov.uk/government/publications/advice-to-schools-and-colleges-on-gangs-and-youth-violence
Criminal Exploitation of Children and Vulnerable Adults: County Lines	https://www.gov.uk/government/publications/criminal-exploitation-of-children-and-vulnerable-adults-county-lines

9.2 – Child Criminal Exploitation (CCE) and CSE

The exploitation of young and vulnerable children can be in the form of coercion into criminal activity and of sexual exploitation. CSE and CCE can affect children, both

male and female and can include children who have been moved (commonly referred to as trafficking) for the purpose of exploitation. A perpetrator will use an imbalance of power to manipulate or deceive a child. The perpetrator could be males, females, groups, adults, or children.

Factors that cause this imbalance of power include:

- Gender
- Sexual identity
- Cognitive ability
- Physical Strength
- Status
- Access to economic or other resources
- At times abuse will be in exchange for something the victim needs or wants but ultimately benefits the perpetrator

It is important to recognise the risk the students at Wolfdale School are within this, the above factors are often linked to the risks the children with ASD and ADHD. Many children seek friendships without knowing the risks. Through the PSHE curriculum this is developed. This includes the learning of Relationships, Sex & Health Education (RSHE) across the whole school.

Relationships and sex education (RSE) and health education	https://www.gov.uk/government/publications/relationships-education-relationships-and-sex-education-rse-and-health-education

Staff should record and report concerns about a child's understanding of relationships to a DSL if there is concern of immediate risk or potential dangers. If this is not the case this can be shared to the allocated teacher who can seek support from the DSL or Curriculum Team

KCSIE 2023 identifies:

'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. '

Child Criminal Exploitation (CCE)

Children are at risk of exploitation to engage in criminal activity. Children can be 'groomed' to take part in criminal activity much in the same way children are 'groomed' for sexual exploitation.

Forms of CCE can include:

- Children being forced or manipulated into transporting drugs or money through county lines, working in cannabis factories, shoplifting, or pickpocketing.
- They can also be forced or manipulated into committing vehicle crime or threatening/committing serious violence to others.
- Children can become trapped by this type of exploitation as perpetrators can threaten victims (and their families) with violence or entrap and coerce them into debt.
- They may be coerced into carrying weapons such as knives or begin to carry a knife for a sense of protection from harm from others.
- Cyber Crime.

As children involved in criminal exploitation often commit crimes themselves, their vulnerability as victims is not always recognised by adults and professionals, (particularly older children), and they are not treated as victims despite the harm they have experienced.

They may still have been criminally exploited even if the activity appears to be something they have agreed or consented to.

It is important to note that the experience of girls who are criminally exploited can be very different to that of boys. The indicators may not be the same, however professionals should be aware that girls are at risk of criminal exploitation too. It is also important to note that both boys and girls being criminally exploited may be at higher risk of sexual exploitation.

Signs of such risk can be read above and below.

Any concerns should be reported to the school's DSL or Deputies.

CSE

Child sexual exploitation is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual.

CSE is a form of child sexual abuse. Sexual abuse may involve:

- physical contact including assault by penetration (for example, rape or oral sex) or
- nonpenetrative acts such as masturbation, kissing, rubbing, and touching outside clothing
- non-contact activities, such as involving children in the production of sexual images
- forcing children to look at sexual images or watch sexual activities

- encouraging children to behave in sexually inappropriate ways or grooming a child in preparation for abuse including via the internet.

CSE can occur over time or be a one-off occurrence and may happen without the child's immediate knowledge such as through others sharing videos or images of them on social media.

CSE can affect any child, who has been coerced into engaging in sexual activities. This includes 16- and 17-year-olds who can legally consent to have sex. Some children may not realise they are being exploited for example they believe they are in a genuine romantic relationship.

As identified in the policy many of the children at the school are at risk due to their social understanding and their risk awareness. With this as a factor it is important staff consider the signs of abuse identified earlier along with:

- children who appear with unexplained gifts or new possessions
- children who associate with other young people involved in exploitation
- children who have older boyfriends or girlfriends
- children who suffer from sexually transmitted infections or become pregnant
- children who suffer from changes in emotional well-being
- children who misuse drugs and alcohol
- children who go missing for periods of time or regularly come home late
- children who regularly miss school or education or do not take part in education - Further linking risks children face within Missing from Education and County Lines include that of CSE.

9.3 - Missing from Education

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 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.

Where a child has repeated and or prolonged periods of absence that cannot be accounted for. This raises concerns of a range of abuse, exploitation and deteriorating health.

The school has an Attendance Policy which identifies the steps taken when a child's absence is not confirmed or authorised. The school hold at least two emergency contact numbers for each student who would be contacted initially. If there is no response this will be passed on to the DSL to follow up which may include contacting the Police.

There will be regular checks completed on attendance to highlight any potential patterns with absence. In response to persistent or patterns of non-attendance the school will arrange a meeting to discuss any concerns with the aim to formulate an effective plan to increase attendance.

Following actions taken from the Attendance Policy if there is a concern of a child Missing from Education, the DSL will contact the Local Authority.

Such concerns will require a Multi-Disciplinary Team approach bringing to together relevant services to address the concerns. There are many other risks that a child may be under if they are missing from education which can be identified below.

	School Actions	Unauthorised absence beyond 2 consecutive days
Student persistent 'Unaccounted for' where family/guardian cannot account for non-attendance	- Student attendance will be recorded as Unauthorised. - Report to Local Authority Child Missing in Education - Family meeting with relevant external agencies - **Aim** *to address concerns and student is safe and attends school*	The Principal will work alongside the Deputy DSL's to: - ensure a welfare check system is put in place to physically see the student. - Report to Local Authority of Child Missing in Education will be completed. - Organise a family meeting to address steps required to encourage reintegration. - Organise access to learning where appropriate. - Effectively complete regular physical
Student/Guardian/Family **<u>Refusal</u>** to access school	- Student attendance will be recorded as Unauthorised. - Initial discussion with family/guardian. - If continued refusal- Initial meeting at school to discuss challenges and implement required actions. **Aim** *to address concerns and student is safe attends.*	

Persistent Patterns of non-attendance/low attendance	- Family/Guardian will receive a letter notifying of concern. - If no further improvement meeting at school to discuss challenges and implement required actions. **Aim** *to address concerns and student is safe attends.*	checks on the student a frequency no less than fortnightly - Additional welfare check may be implemented including checks via phone, email this will be decided on a case-by-case basis.
Students who are, Looked After, have a Child in Need Plan, Child Protection or have allocated workers the school will work with relevant parties in addressing concerns of absences.		

9.4- County Lines

Exploitation of vulnerable children is no longer a city-based issue in England; gang culture is a risk across cities and counties. It is identified that children could be involved in criminal activity, drug networks or gangs that groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns.

There are numerous factors which could be signs of a child being exploited including the use of language, new items such as gifts and a lack of attendance. Within the KCSIE 2023 it identified County Lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years
- can still be exploitation even if the activity appears consensual
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence
- can be perpetrated by individuals or groups, males or females, and young people or adults
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources

Staff should raise any concerns they have linked to County Lines with the DSL immediately who will then respond accordingly including contacting the Police and/or First Response.

Further guidance regarding County Lines can be found within the link from The Children's Society:

https://www.childrenssociety.org.uk/information/professionals/resources/county-lines-toolkit

9.5 - Cyber Crime

Technology is part of everyday life for many families and children. There are many risks online as identified through this policy, whether through bullying, grooming of exposure and sharing of images.

In addition to this there is:

- Cyber Enabled Crime – crimes that are enhanced in scale with the use of computers e.g., online fraud, online grooming, cyber bullying
- Cyber Dependent Crime – crimes that can only be committed with use of technology e.g., hacking, ransomware, DDoSing (a denial of service as a result of a targeted attack)

Children involved in Cyber Dependent Crime could be at further risk of CCE (child criminal exploitation). Where gangs identify children with strong computer skills and abilities to help hack networks or target attacks.

Staff should be aware of the terminology and tools that may link to potential of act of Cyber Dependent Crime:

- Hacking – accessing computers or networks
- Spamming – where viruses can be shared
- ToR which is a browser for the Dark Web
- Virtual Machines which can hide operating systems
- Wi-Fi Pineapple which is a piece of equipment that is used to collect data over the internet
- Discord an online forum where hacking tips are shared
- Metapoint a software package that makes hacking simpler

Staff should report any concerns to the DSL or Deputy. Such concerns are then shared with police department dedicated to Cyber Crime.

9.6 - Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. Indicators that a family may be at risk of homelessness include household debt, rent arrears, domestic abuse and anti-social behaviour, as well as the family being asked to leave a property.

The DSL will contact the Local Housing Authority in conjunction with Leicestershire or Leicester City Children Safeguarding.

9.7 - Honour Based Abuse (HBA)

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving "honour" often involves a wider network of family or community pressure and can include multiple perpetrators. It is important to be aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and should be handled and escalated as such. Professionals in all agencies, and individuals and groups in relevant communities, need to be alert to the possibility of a child being at risk of HBA, or already having suffered HBA.

Actions

If staff have a concern regarding a child that might be at risk of HBA or who has suffered from HBA, they should speak to the designated safeguarding lead (or deputy). As appropriate, they will activate local safeguarding procedures, using existing national and local protocols for multi-agency liaison with police and children's social care. Where FGM has taken place, since 31 October 2015 there has been a mandatory reporting duty placed on teachers that requires a different approach.

9.8 - Forced Genital Mutilation (FGM)

FGM comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

FGM mandatory reporting duty for Teachers

Section 5B of the Female Genital Mutilation Act 2003 (as inserted by section 74 of the Serious Crime Act 2015) places a statutory duty upon teachers along with regulated health and social care professionals in England and Wales, to report to the police where they discover (either through disclosure by the victim or visual evidence) that FGM appears to have been carried out on a girl under 18. Those failing to report such cases will face disciplinary sanctions. It will be rare for teachers to see visual evidence, and they should not be examining pupils or students, but the same definition of what is meant by "to discover that an act of FGM appears to have been carried out" is used for all professionals to whom this mandatory reporting duty applies.

Teachers must personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless the teacher has good reason not to, they should still consider and discuss any such case with the school's or college's designated safeguarding lead (or deputy) and involve children's social care as appropriate. The duty does not apply in relation to at risk or suspected cases (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) or in cases where the woman is 18 or over. In these cases, teachers should follow local safeguarding procedures.

Further information can be read in Annex C.

9.9 - 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. 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 perpetrators use perceived cultural practices as a way to coerce a person into marriage. Schools and colleges can play an important role in safeguarding children from forced marriage.

The Forced Marriage Unit has published statutory guidance and multi-agency guidelines, pages 35-36 of which focus on the role of schools and colleges. School and college staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email fmu@fco.gov.uk

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

Guidelines regarding Forced Marriage can be found:
https://www.gov.uk/government/publications/the-right-to-choose-government-guidance-on-forced-marriage

The following facts are taken from the Home Office website below.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf

Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

10- Mental Health

As identified, many of our students have difficulties that consist of elements associated with Mental Health, many students have Social, Emotional and Mental

Health diagnosis. The school have an approach to Wellbeing which can be found in the Curriculum Policy and a Therapeutic Service of which further detail can be read in the Therapy Policy.

All our students have an allocated PSP which identify consistent traits and challenges associated with their difficulties. It is important staff are aware of these and observe for any increases or deterioration of traits or the start of additional behaviours that are a sign of a deterioration of Mental Health.

The KCSIE 2023 recognises that a child experiencing or having experienced any of the identified abuses above, or risks identified below, or previous trauma may display changes in their mental health. With this, staff should record, and report concerns of deterioration to a DSL or dDSL.

Further information can be found:

Promoting children and young people's emotional health and wellbeing.	https://www.gov.uk/government/publications/promoting-children-and-young-peoples-emotional-health-and-wellbeing
Rise Above	https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview
Mental Health and Behaviour in Schools	https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2

11 - Radicalisation

The school is lucky to be based within Leicester allowing for experiences and exposures to a range of cultures, religions, races and groups. The school aim is for all children is to be able to live a life they choose, free of discrimination and harm. Through the curriculum, activities are organised to promote a wide range of differences and learning experiences that incorporate British Values.

British Values promote the importance of allowing a society that includes democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs with many faiths, no faiths and beliefs and does not call for the death of armed services.

Extremists look to dismantle these fundamental values to radicalise individuals for their own cause. Radicalisation refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups.

Staff should recognise the extremist groups vary from Right Wing to Left Wing and should not stereotype terrorist groups only being based within foreign countries such

as Action First a banned group known within England. There are various reasons that make an individual vulnerable to radicalisation including:

- influence from family
- influence from peers
- difficulty in recognising coercive practice
- disability

Vulnerable people can be targeted through various forums including the internet for instance social media and the targeted bombarding of information that can be extreme in nature or based on opinion rather than facts some refer to this as ‘Fake News’. It is important to recognise that this includes the risk of online gaming where individuals are exposed to chat dialogue from others.

12 - Prevent Duty

All schools are subject to a duty under section 26 of the Counterterrorism and Security Act 2015 (the CTSA 2015), to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

This duty encourages schools to be responsive in helping Prevent the risk of radicalisation. The school’s approach to develop the children through emotional support, behaviour support and the curriculum, through embedding of the fundamental British Values to build resilience, determination, self-esteem, and confidence.

The school’s DSL will manage concerns related to radicalisation as per training through local authority which will include contacting police.

Leicestershire County	prevent.team@leicestershire.pnn.police.uk
Leicester City	0116 248 6276

Following such a referral, the police may request a submission of a ‘Refer someone to Prevent Team’. Once reviewed this may trigger a Preliminary Review which can lead to Channel Panel Meeting which can result in Channel Intervention.

The Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism, Statutory guidance for Channel panel members and partners of local panels (2015) identifies indicators:

An individual is Engaged with an extremist group, cause or ideology include:

- spending increasing time in the company of other suspected extremists
- changing their style of dress or personal appearance to accord with the group

- day-to-day behaviour becoming increasingly centred around an extremist ideology, group or cause
- loss of interest in other friends and activities not associated with the extremist ideology, group or cause
- possession of material or symbols associated with an extremist cause (e.g., the swastika for far-right groups)
- attempts to recruit others to the group/cause/ideology
- communications with others that suggest identification with a group/cause/ideology

An individual has an Intention to cause harm, use violence or other illegal means include:

- clearly identifying another group as threatening what they stand for and blaming that group for all social or political ills
- using insulting or derogatory names or labels for another group
- speaking about the imminence of harm from the other group and the importance of action now
- expressing attitudes that justify offending on behalf of the group, cause or ideology
- condoning or supporting violence or harm towards others
- plotting or conspiring with others

An individual is Capable of causing harm or contributing directly or indirectly to an act of terrorism include:

- having a history of violence
- being criminally versatile and using criminal networks to support extremist goals
- having occupational skills that can enable acts of terrorism (such as civil engineering, pharmacology or construction)
- having technical expertise that can be deployed (e.g., IT skills, knowledge of chemicals, military training or survival skills)

The School have a completed Risk Assessment in Annex G

12.1 - The Channel Process

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

The Panel can consist of:

- representation from local authority relevant to the referrals and cases to be discussed
- police representation for each of the local authorities relevant to the referrals and cases

Other panel members as referrals and cases dictate which may include:

NHS• Social workers• Schools, further education colleges and universities• Youth offending services• Directors of children's and adult's services• Chairs of Local Safeguarding Children Boards and Housing• Prisons• Probation

The school may be asked to attend a Channel panel to discuss the child referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Channel assess the vulnerability of a child through:

- Engagement with an extremist group, cause or ideology
- Intent to cause harm and.
- Capability to cause harm

If Channel recognise the child is vulnerable and there is a risk the outcome would require a Channel approved Intervention through a Channel approved provider.

If the Panel feel there is not a risk of radicalisation the outcome can be passed back to the Local Authority and partners which can include the school.

Intervention support could include:

- Mentoring support contact – work with a suitable adult as a role model or providing personal guidance, including guidance addressing extremist ideologies
- Life skills – work on life skills or social skills generally, such as dealing with peer pressure
- Anger management session – formal or informal work dealing with anger
- Cognitive/behavioural contact – cognitive behavioural therapies and general work on attitudes and behaviours
- Constructive pursuits – supervised or managed constructive leisure activities
- Education skills contact – activities focused on education or training
- Careers contact – activities focused on employment
- Family support contact – activities aimed at supporting family and personal relationships, including formal parenting programmes
- Health awareness contact – work aimed at assessing or addressing any physical or mental health issues
- Housing support contact – activities addressing living arrangements, accommodation provision or neighbourhood
- Drugs and alcohol awareness – substance misuse interventions

Staff at the school complete online training regarding Prevent see link below.

https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html

13 - Safeguarding concerns and allegations made about staff, including supply teachers, volunteers and contractors

Guidance for Safer Working Practice for those working with children and young people in education settings May 2019 (Addendum April 2020) set out the expectations for all staff and volunteers to follow within the school setting. This is provided to staff on employment along with Safeguarding in Education Induction which reinforces the key expectations.

Underpinning principles **Staff must**:

- be aware that the welfare of the child is paramount
- understand their responsibilities to safeguard and protect children
- be responsible for their own actions and behaviour, and avoid any conduct which could lead any reasonable person to question their motives and intentions
- apply the same professional standards regardless of age, disability, race, colour, ethnic or national origin, gender, religion or belief, sexual orientation, marital status or trade union membership

Safer Working Practices:

- Staff must treat information about children and their families discretely and not disclose confidential matters.
- Staff should be careful not to misuse their power and influence over children.
- Staff should ensure their behaviour remains professional at all times, including their dress, use of language and online communication which is or could become publicly seen.
- Physical intervention should never be inappropriately used, should follow relevant guidelines and be clearly recorded and reported.
- Physical contact should be minimal, time limited, age appropriate and able to be justified.
- Intimate care and first aid should only be administered according to relevant procedures.
- Staff should not offer lifts to children outside agreed requirements e.g. transport to a sports event. Any impromptu or emergency arrangement of lifts should be recorded and should be able to be justified.
- Staff should not receive gifts other than small tokens of appreciation.
- Staff should not give gifts other than as part of an agreed reward system or given to all children equally.
- Staff should not engage in personal email or telephone communication with children. This includes texting, messaging, video chat, social networking sites etc
- Any out of school contact should be planned and agreed with senior staff and parents. Appropriate social contact (e.g., when a teacher and

parent are part of the same social circle) will be easily recognised and openly acknowledged.

- Only authorised areas of the curriculum should contain any sexual or other sensitive material. Senior staff should be consulted if there is any chance of misinterpretation.
- Internet use should be according to school policy and inappropriate content must not be accessed.
- There should be no unauthorised photography of children. Photographs of children should be the property of the school and not retained on personal equipment.
- Staff should guard against young people developing an infatuation with them and report any such concerns to senior staff.
- Staff should be mindful of situations where a pupil or parent comes to depend on them for support outside their role and discuss this promptly with a senior member of staff.
- Staff are in a position of trust and should never engage in any sexual relationship with pupils in or out of school. Communication must never be sexually suggestive.

Working with children with challenging behaviour does often result in staff using ‘reasonable-force’ as they are trained through Team Teach. The schools Behaviour Policy identifies the measures in place when restraint has been used which includes immediate contact to family/carers and recording and logging of use. Reasonable Adjustments are made to ensure each child has their own Positive Support Plan which identifies steps to reduce the need for staff to use restraint.

Every effort is made to ensure that staff act accordingly with children it is important that there is not a culture of ‘that does not happen here’ when it comes to recognising concerns with staff.

Families, carers and staff can raise concerns or an allegation relating to the conduct of staff behaviour, including volunteer staff, contracted and supply staff. Such concerns could include those that:

- behave in a way that has harmed a child, or may have harmed a child
- possibly committed a criminal offence against or related to a child
- behave towards a child or children in a way that indicates he or she may pose a risk of harm to children
- behaved or may have behaved in a way that indicates they may not be suitable to work with children. This includes the review where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children. For example, a member of staff is involved in domestic violence at home. No children were involved, but the schools need to consider what triggered these actions and could a child in the school trigger the same reaction, therefore being put at risk, assessing the Transferrable Risk.

Families, carers and staff may have concerns that are considered ‘low-level’, it is important that these are not seen to be insignificant as any concern is a concern, no matter how small, and even if no more than causing a sense of unease or a ‘nagging doubt’. Such concerns could include an adult:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- using inappropriate sexualised, intimidating, or offensive language

Concerns should be raised directly with the Principal unless the concern is regarding this person, in this case concerns should be raised with the Directors. Historic allegations will be referred to the police.

When reporting you must:

- Keep the matter confidential.
- Do not alert the person you are concerned about as this could compromise any future investigation.
- Follow procedures but you have a duty to ensure matters are taken forward and can contact the Allegation Managers yourself.

Staff can contact the Allegations Officer directly:

Leicestershire	0116 305 7597
Leicester City	0116 454 2419

Following the receipt of a concern regarding staff conduct there will be an assessment and review of information. If there is an immediate and/or significant risk to a child or there has been an illegal activity, then it will be referred to the Police along with the Local Authority Allegation Officer.

If there is no immediate evidence of risk to a child or illegal activity the concern will be investigated alongside the relevant Allegations Officer. At this point the Allegations Officer may advise for further detail and input from other services or advise for the school to follow its own disciplinary procedure as set out in the Performance Management Framework.

During this period the alleged staff may be temporarily suspended from their allocated role and responsibility or have these duties amended. The outcome of investigation will result in the following:

- 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. The term, therefore, does not imply guilt or innocence.
- Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made.
- Where a teacher, including an agency, is dismissed or ceases to be used because of serious misconduct, or maybe dismissed or ceased using their services had they not left first, the school must consider whether to refer the case to the Secretary of State (via the Teaching Regulation Agency).

In relation to Supply, Contracted and Volunteer Staff the above actions will be taken, this will not necessarily follow the Performance Management Framework instead managed directly with the relevant allegations officer. Where the school use consistent supply staff the HR departments will meet to ensure collaborative practice is agreed.

Organisations or Individuals using school premises

In an instance where an allegation relating to an incident that has happened on the school site when an individual or organisation was using their school premises for the purposes of running activities for children (for example community groups, sports associations, or service providers that run extra-curricular activities) the school will respond following the procedures identified including informing the LADO.

14 –Children Potentially at Greater Risk of Harm

Wolfdale School will ensure that children at Wolfdale School, with or without Social Workers, receive effective support and access to a safe and secure environment in and out of school.

It is recognised that children with allocated Social Workers may be at a greater risk outside of school and appropriate actions and support must be in place including appropriate information sharing to relevant parties and attendance to regular review meetings.

14.1 Looked After Child (LAC)

Often a LAC would be in this position due to potential experience of abuse or neglect. Such experiences can leave the child at a heightened vulnerability of abuse and of displaying behaviours associated with an abuser.

The schools DSLs are aware of any LAC and in response to any concerns, they have the contact details for the allocated worker at Virtual School and Social Care, along with reporting any safeguarding concerns through the relevant area.

The school complete PEP meetings which allow for the child's designated teacher and relevant school leads to share progress and ensure opportunities for concerns to be shared and strategies to support to be put forward. Such meetings allow for Pupil Premium, an allowance available to a LAC to increase access, to be reviewed.

Role of Virtual School Heads

Virtual school Heads manage pupil premium plus for looked after children; they

receive this funding based on the latest published number of children looked after by the local authority.

The designated teacher should work with the virtual school head to discuss how funding can be best used to support the progress of looked after children in the school and meet the needs identified in the child's personal education plan.

The designated teacher should also work with the virtual school head to promote the educational achievement of previously looked after children. As with designated teachers, following the commencement of sections 4 to 6 of the Children and Social Work Act 2017, virtual school heads have responsibilities towards children who have left care through adoption, special guardianship, or child arrangement orders or who were adopted from state care outside England or Wales.

Their primary role for this group will be the provision of information and advice to relevant parties. In addition to their statutory duties, the role of virtual school heads was extended in June 2021, to include a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of children with a social worker.

In offering advice and information to workforces that have relationships with children with social workers, virtual school heads should identify and engage with key professionals, helping them to understand the role they have in improving outcomes for children. This should include Designated Safeguarding Leads, social workers, headteachers, governors, Special Educational Needs Co-ordinators, mental health leads, other local authority officers, including Designated Social Care Officers for SEND, where they exist.

14.2- Child Protection (CP) - **Section 47 of The Children Act 1989**

The school will be informed if a child has a Child Protection plan in place. If so, there will be an allocated Social Worker to the child and family. If such a plan is in place it is often a result of a proven safeguarding risk or likely to suffer significant harm.

The school will be required to maintain communication of concerns and issues directly with the allocated worker and to attend Child Protection Review meetings. These meetings are held regularly to ensure appropriate actions are completed within timescales.

14.3- Child in Need (CIN)- Section 17 of The Children Act 1989

The school will be informed when a CIN plan is in place. This often has an allocated Social Worker who supports the family/carers with acute needs and access to supporting services to help prevent potential harm to a child.

The school will attend regular meetings to share information and promote strategies and where possible signpost services that can support.

15 - Confidentiality

Details of concerns are scanned and stored securely electronically where the access is restricted to the DSLs only. The school use a MiS system to log information with access restricted.

With recent updates in The Data Protection Act 2018 and GDPR does not prevent the school to share information to keep a child safe. Information shared is done so with the child's safety and welfare being paramount.

Any Child Protection file that is required to be transferred between providers would be done via the DSL as soon as possible. This is completed through a 'signed for' delivery whether in person or secure post.

KCSIE 2023 identifies that staff should feel:

- 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 practitioners to share special category personal data. This includes allowing practitioners to share information without consent where there is good reason to do so, and that the sharing of information will enhance the safeguarding of a child in a timely manner, but it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- for schools, not providing pupils' personal data where the serious harm test under the legislation is met. For example, in a situation where a child is in a refuge or another form of emergency accommodation, and the serious harms

test is met, they must withhold providing the data in compliance with schools' obligations under the Data Protection Act 2018 and the GDPR. Where in doubt schools should seek independent legal advice.

Further information can be found on Data protection: toolkit for schools:

https://www.gov.uk/government/publications/data-protection-toolkit-for-schools

15.1 - Sharing with Parents/Carers

Where possible the school will discuss concerns with the parents/carers. When dealing with concerns the various conversations may be difficult for parents/carers to discuss and where appropriate a meeting at the school will be held.

There are certain times where the school will not discuss concerns relating to Safeguarding if it is felt the child could be put at further risk.

Part 2: School Approach

16- All Staff

All staff have a duty to provide a safe environment for all children, they should ensure they are aware of their responsibilities as set out within the Safeguarding Policy and Behaviour Policy.

Staff:

- Must read the Safer Working Practice (2022) guidelines which are sent prior to starting at the school along with the Staff Code of Conduct in the Staff Handbook
- Must read the whole of the Policy including all Annex's
- Must read Part 1 and Annex A of Keeping Children Safe in Education (September 2023)
- Must receive Safeguarding training delivered by school DSL which is updated along with statutory guidance
- Must attend and complete Safeguarding Training such as Online Safety including the expectations, applicable roles and responsibilities in relation to filtering and monitoring
- Will receive Safeguarding updates through workshops, staff meetings

Staff should feel confident they are aware of the school's points of contact for sharing concerns, this can be found in Section 20- DSL.

Staff should feel confident on how they can report a concern to a DSL. This can be completed directly or via telephone, numbers are available through the office.

If a Child Makes a Disclosure to You

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

- Stay Calm, do not panic and think about your non-verbal communication e.g., body language and facial expression do not show that you are shocked or upset.
- Listen to what they have to say and believe them – your role is to listen not try and solve the issue they share.
- Allow them time to talk freely and do not ask leading questions.
- Reassure the child that they have done the right thing in sharing with someone they feel safe with. Do not tell them they should have told you sooner.
- It is important you inform the child that you will need to share the information to seek the best help. Do not promise to keep it a secret.
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it.
- Sign and date the write-up and pass it on to the DSL or add directly to the school MiS system. Alternatively, if appropriate, make a referral to children's

social care and/or the police directly and tell the DSL as soon as possible that you have done so.

- All staff should be able to reassure victims that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence, or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

Staff should avoid:

- panic
- allow shock or disgust to show in your facial expression, intonation or body language
- probe for more information than is offered
- speculate or make assumptions
- make negative comments about the alleged abuser
- approach the alleged abuser
- make promises or agree to keep secrets

Staff will be asked to complete information directly onto the school MiS system or a written sheet. Staff should ensure they write the facts of what has been said and sign and date the document. Staff should follow the steps provided in training and identified in above where Child Makes a Disclosure to You.

Staff have the right to contact Early Help regarding a child if consent has been given.

Early Help (Leicestershire)	0116 305 8727
Early Help (Leicester City)	0116 454 1004

If staff feel there is an immediate risk of harm to a child, and they cannot contact the DSL they can contact the local Social Services team and report the concern.

Leicestershire County Council First Response	0116 305 0005
Leicester City Social Services	0116 454 1004

Staff **must** contact the **Police** directly if they believe FGM has **been carried out**.

Staff **must** report to the school DSL where they feel there is a child at risk of FGM.

Staff should also contact the Police of Forced Marriage Unit directly if they have concerns related to forced marriage.

Forced Marriage Unit	020 7008 0151 fmu@fco.gov.uk

Staff can contact the Police directly with concerns of Serious Violence including Radicalisation.

17 - Online Safety, Web Filtering and Monitoring

Throughout the Policy it can be seen where the risks a child can be left with online. Within the school there are appropriate filters and monitoring in place named Untangle which leverages both the IWF and CTIRU databases which are required as set out in the most recent KCSIE report. This system ensures students and staff do not access inappropriate content on any of the school devices or any devices using the school Wi-Fi. Currently this filter system is monitored in conjunction with a paper signing in and out of equipment system. If any inappropriate content is accessed, then this sends a report to the ICT technical support staff and this can then be investigated. All staff and students are made aware that they are monitored on the internet when starting at Wolfdale with reminders throughout the year.

Initial Alert of Web Filtering Safeguarding concerns	ICT Technical Support
ICT Technical Support Directly inform	DSL and dDSL Team
Response	Lead by DSL Team
Monitoring of Web Filtering	Safeguarding Meeting – DSL Team Safeguarding Audit – Directors (Governance)

Where Teachers are required to access information or resources online to support learning must inform dDSL prior and inform ICT Technician.

Students have restricted opportunities to access their personal devices, however the school are aware that at times they may access their personal devices. Students accessing personal devices not connected to web filter using 3g/4g/5g require **staff to:**

- Remain vigilant to what is accessed.
- Where appropriate ask the student.
- Monitor for any signs linked to radicalisation or abuse including language, ideologies, behaviours whether escalating or appearing withdrawn.

- Staff should immediately report concerns to DSL or dDSL.

Factors that should be considered are

- content: being exposed to illegal, inappropriate, or harmful material; for example, pornography, fake news, racist or radical and extremist views.
- contact: being subjected to harmful online interaction with other users; for example, commercial advertising as well as adults posing as children or young adults.
- conduct: personal online behaviour that increases the likelihood of, or causes, harm; for example, making, sending, and receiving explicit images, or online bullying.
- Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel a child or staff are at risk, please report it to the Anti-Phishing Working Group (https://apwg.org/).

Children at Wolfdale School will have the opportunity to learn about online risks and ways to keep safe through the PSHE curriculum. Links to support learning can be found in **Annex H.**

We recognise that technology is a significant component in many safeguarding and wellbeing issues and that children are at risk of abuse online as well as face to face. Some children may use mobile and smart technology, whilst at school and outside of school, to sexually harass their peers, share indecent images (consensually and non-consensually) and view and share pornography and other harmful content. Many children have unrestricted access to the internet via their mobile phones.

Staff will always respond if informed that children have been involved in sharing indecent images. The Department of Education Guidance “Sharing nudes and semi-nudes: advice for education settings working with children and young people” (Dec 2020) will be used to guide the school’s response on a case-by-case basis.

The key points for staff being:

- Report immediately to the DSL
- Never view, copy, print, share, store or save the imagery, or ask a child to share or download – this is illegal.
- If you have already viewed the imagery by accident (e.g., if a young person has showed it to you before you could ask them not to), report this to the DSL (or equivalent) and seek support.
- Do not delete the imagery or ask the young person to delete it.
- Do not ask the child/children or young person(s) who are involved in the incident to disclose information regarding the imagery. This is the responsibility of the DSL (or equivalent).
- Do not share information about the incident with other members of staff, the young person(s) it involves or their, or other, parents and/or carers.

- Do not say or do anything to blame or shame any young people involved.
- Do explain to them that you need to report it and reassure them that they will receive support and help from the DSL (or equivalent).
- DSL response will include contact to Police and relevant Local Authority

Staff must report immediately any concerns or instances where a student may have accessed websites which are deemed a risk to a DSL.

In response to concerns the DSL will assess the risk and consider the following actions:

- Referral to Social Care, this may include Early Help
- Referral to Prevent Team
- Engage with family/guardians
- Support child with further education in risks to safety online
- Review access with ICT Technical Support

18 - Concerned About DSL Response

If unhappy about the response the DSL or school have taken staff can follow the steps identified in the school's Whistleblowing Policy.

Staff can also report concerns to:

Department of Education	https://www.gov.uk/contact-dfe DfE helpline Telephone: 0370 000 2288 Monday to Friday, 9am to 5p
Ofsted	Email enquiries@ofsted.gov.uk Telephone: 0300 123 1231
NSPCC	Email: help@nspcc.org.uk Telephone: 0808 028 0285

19 - Remote Learning and Operations

Prior to students accessing online/remote learning the school will be in contact with families/guardians to share:

- The purposes of the activity
- What is required to be shared
- Which students and staff they will be interacting with
- Sites required to access

- The monitoring and rules in use

Guidance for Safer Working Practice addendum April 2020 provides protocols for working from home which include:

- Wherever possible, staff should use school devices and contact pupils only via the pupil school email address / log in
- Assessment with families/guardians completed for student ICT access, the school have completed this and provided resources as required
- The school have provided a timetable for access including offering appropriate screen time breaks
- DSL and dDSL have access to online learning being provided
- Staff are expected to wear appropriate clothing as set out in the Staff Handbook; staff have been informed to wear Staff Uniform
- If 1:1 online lesson is in place to agree parent presence and a member of the Management Team present
- Lessons will not be recorded unless agreed by the Principal and the explicit consent of the families/guardians has been received
- To provide guidance and support to families/guardians regarding Online Safety
- Staff are advised to sit against a neutral background
- Staff and students should avoid being sat in their bedroom
- Double check that any other tabs they have open in their browser would be appropriate for a child to see, if they are sharing their screen
- Use professional language

Attendance

Students' attendance is monitored by school. A pattern of attendance will trigger a welfare check process. This is determined on a case-by-case basis with key staff liaising with home and external professions where necessary. Priority to establish contacts firstly takes the form of telephone or email contact. In cases where it is felt by school safeguarding team a home visit maybe triggered.

Online Attendance (E-learning)

Attendance for online learning will be recorded. Absence will be reported to the school via the 'Online Learning Attendance' group. This group will advise of attendance and non-attendance, using student initials by 10am each morning. The staff supporting the lessons are included into the group, so can be responsible for sharing the information.

The Admin staff will record as per the 'Attendance Policy' and contact parents/carers to query any non-attendance etc.

Student Rules

Students have been shared the following rules and expectations within the online learning:

When using emails, Microsoft Teams, or any school devices we must make sure we follow the Wolfdale School rules.

Respect

- Show respect to each other during your online lessons
- Show respect to each other when using emails
- Show respect for each other when using Microsoft Teams
- Show respect for each other by using appropriate language and not swearing

Instructions

- Always follow staff instructions during your online lessons
- Always follow staff instructions when using your emails
- Always follow staff instructions when using Microsoft Teams
- Usernames MUST be your first name, if you use offensive names, you will be removed, and school will contact your parent/guardian
- Make positive choices about your online lessons, emails, and Microsoft Teams
- We only use our Wolfdale School emails addresses for schoolwork

Achievement

- Log onto your online lessons everyday
- Work hard during your online lessons to be the best you can be
- Be proud and share your achievements

Safety

- We always work safely during our lessons, when using emails or using Microsoft Teams
- We help each other to work safely during our lesson, when using emails or using Microsoft Teams
- We report any unsafe behaviour we see or hear to your teacher
- We do not access / download any inappropriate content onto our own devices or devices that belong to the school
- We do not use or write any personal information in our school emails, unless a teacher has asked you to do so
- We do not give out our email address to anyone other than school staff, or our parents/carers
- We do not give out our password

Tolerance

- We are kind to each other and respect our differences
- We do not hurt or upset each other
- We take turns to speak, and listen to others

Single Central Record/Recruitment

- Safer Recruitment procedures will continue to be robustly applied including where virtual interviews may be used and if so, a risk assessment will be completed
- The Single Central Record will be continuously updated and include the details of any staff who may be engaged in teaching and learning from home and any catch-up tutors employed by the school

Whistleblowing

During Remote Operations staff must continue to follow the steps identified in the school's Whistleblowing Policy.

Staff can also report concerns to:

Department of Education	https://www.gov.uk/contact-dfe DfE helpline Telephone: 0370 000 2288 Monday to Friday, 9am to 5p
Ofsted	Email enquiries@ofsted.gov.uk Telephone: 0300 123 1231
NSPCC	Email: help@nspcc.org.uk Telephone: 0808 028 0285

19.1 - Elective Home Education (EHE)

Many children may have positive experiences accessing remote learning. We would expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll.

If a parent/guardian felt it was best for their child to home educate the school would initially arrange a meeting inviting:

- Parent/Guardian
- Key Professionals, allocated workers such as CAMHs or Social Worker
- Local Authority
- Key School staff

The meeting will need to ensure the decision made to home educate keeps the child's best interests and safety at the heart and appropriate access to relevant support is established.

20 - The Directors

In accordance with the statutory guidance "Keeping children safe in education" September 2023, the Directors (Governing Body) will ensure that:

> The school has its own child protection/safeguarding policy, procedures and training in place which are effective and comply with the law at all times. The policy is made available publicly.
>
> The school operates safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Principal, nominated Director and other staff involved in the recruitment process have undertaken Safer Recruitment Training.

There are procedures for dealing with safeguarding concerns and allegations of abuse against members of staff and volunteers.

There is a senior member of the school's leadership team who is designated to take lead responsibility for dealing with child protection (the "Designated Safeguarding Lead") and there is always cover for this role with appropriate arrangements for before/after school and out of term time activities.

School Director, Gemma Thompson, undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years in addition the Directors complete annual safeguarding training led by the school's DSL.

The Director (Gemma Thompson) completes an annual Audit across Safeguarding which includes a review of:

- Online Safety
- Filtering and monitoring within the school (Untangle) – this will use Cyber Security Standards March 2023
- SCR Check
- Safeguarding Concerns
- Safeguarding Training

The Designated Safeguarding Lead undertakes effective Local Authority training (in addition to basic child protection training) and this is refreshed every two years. In addition to this formal training, their knowledge and skills are updated at regular intervals (at least annually) using safeguarding briefings etc.

The Principal, and all other staff, directors and volunteers who work with children (including early years practitioners within any settings on the school site), undertake appropriate training which is regularly updated at least annually, (and more comprehensively, every three years in compliance with the Safeguarding Children Partnership protocol); and new staff and volunteers who work with children are made aware of the school's arrangements for child protection and their responsibilities (including this policy, Part 1 of Keeping Children Safe in Education, the pupil behaviour policy and how to respond if children go missing). The Local Authority Induction leaflet, ("Safeguarding in Education Induction – Child Protection Information, Safer Working Practice") will be used as part of this induction and Annex A "Keeping children safe in education" September 2023 is provided to all staff working directly with children.

Any deficiencies or weaknesses brought to the attention of the Directors will be rectified without delay.

Gemma Thompson (Director) deals with any safeguarding concerns or allegations of abuse made against the Principal, in liaison with the Local Authority Allegations Manager (LADO).

Effective policies and procedures are in place and updated annually including a behaviour "code of conduct" for staff and volunteers - "Guidance for Safer Working Practice for those who work with children in education settings 2022". Information is provided to the Local Authority (on behalf of the Safeguarding Children Partnership) through the Safeguarding Annual Return.

Gemma Thompson will champion issues to do with safeguarding children and child protection within the school, liaise with the Designated Safeguarding Lead, and provide information and compliance/monitoring reports to the Directors.

The school contributes to inter-agency working in line with statutory guidance "Working Together to Safeguard Children" 2018 including providing a co-ordinated offer of Early Help for children who require this. This Early Help may be offered directly through school provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Leicestershire and Rutland Safeguarding Children Partnership.

21 - Principal

At Wolfdale School the Principal is the Designated Safeguarding Lead and has a responsibility of ensuring the review of actions taken by the Deputy DSL's. This includes the potential attendance in Multi-Disciplinary-Team meetings which may include social services, police or supporting services such as ADHD solutions or

National Autistic Society. The Principal is responsible for managing staff allegations where they are not involved. The Principal will ensure that:

• The policies and procedures adopted by the Governing Body are effectively implemented and followed by all staff.

• Sufficient resources and time are allocated to enable the Designated Safeguarding Lead and other staff to discharge their responsibilities, including taking part in strategy discussions and other inter-agency meetings, and contributing to the assessment of children.

• Allegations of abuse or concerns that a member of staff or adult working at school may pose a risk of harm to children or young people are notified to the Local Authority Designated Officer.

• All staff and volunteers feel able to raise concerns about poor or unsafe practice regarding children, and such concerns are addressed sensitively and effectively in a timely manner. The NSPCC whistle blowing helpline number is also available (0800 028 0285).

• All staff are made aware that they have an individual responsibility to pass on safeguarding concerns and that if all else fails to report these directly to Children's Social Care (Children and Family Specialist Services) or the Police.

22 - <u>DSL</u>

The Lead DSL is required to:

- Complete external safeguarding training which enables them to investigate concerns raised, updated every two years
- Take all steps identified in this policy to ensure child's safety
- Communicate/liaise with relevant external services including Early Help, First Response, CAMHS and Allegations Officer
- To take lead responsibility in the implementation of online safety, web filtering and monitoring
- Communicate/liaise with relevant internal teams including Inclusion, Therapy, SENCO, Curriculum, HR and Directors
- Deliver Safeguarding training to all staff to support them in recognising the various risks children are faced with along with the manner which they can report it.
- Ensure staff are able to contact a DSL or Deputy DSL through the school day
- Keep knowledge and skills updated through e-bulletins and or liaising with other safeguarding leads.

A key role for the DSL and dDSL is to work collaboratively with Multi Agencies, the mapping in 21.1 indicates the core roles/responsibilities that the DSL and Deputies have within the school and who they may work alongside.

The responsibilities of the Designated Safeguarding Lead are found in Annex B of "Keeping Children Safe in Education 2023" and include:

Manage referrals

The designated safeguarding lead is expected to:

- refer cases of suspected abuse to the local authority children's social care as required
- support staff who make referrals to local authority children's social care
- refer cases to the Channel programme where there is a radicalisation concern as required
- support staff who make referrals to the Channel programme
- refer cases where a person is dismissed or left due to risk/harm to a child to the Disclosure and Barring Service as required; and
- refer cases where a crime may have been committed to the Police as required.
- ensure the child's wishes and feelings are taken into account when determining what action to take and what services to provide

Work with Others

The designated safeguarding lead is expected to:

- act as a point of contact with the three safeguarding partners
- liaise with the headteacher or principal to inform him or her of issues- especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations
- as required, liaise with the "case manager" (as per Part four) and the designated officer(s) at the local authority for child protection concerns in cases which concern a staff member
- liaise with staff (especially pastoral support staff, school nurses, IT Technicians, and SENCOs, or the named person with oversight for SEN in a college and Senior Mental Health Leads) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies; and
- act as a source of support, advice, and expertise for all staff

Training

The designated safeguarding lead (and any deputies) should undergo training to provide them with the knowledge and skills required to carry out the role. This training should be updated at least every two years. The designated safeguarding lead should undertake Prevent awareness training. Training should provide designated safeguarding leads with a good understanding of their own role, and the

processes, procedures and responsibilities of other agencies, particularly children's social care, so they:

- understand the assessment process for providing early help and statutory intervention, including local criteria for action and local authority children's social care referral arrangements
- have a working knowledge of how local authorities conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to, and understands, the school's or college's child protection policy and procedures, especially new and part time staff
- are alert to the specific needs of children in need, those with special educational needs and young carers
- understand relevant data protection legislation and regulations, especially the Data Protection Act 2018 and the General Data Protection Regulation
- understand the importance of information sharing, both within the school and college, and with the three safeguarding partners, other agencies, organisations, and practitioners
- are able to keep detailed, accurate, secure written records of concerns and referrals
- understand and support the school or college with regards to the requirements of the Prevent duty and are able to provide advice and support to staff on protecting children from the risk of radicalisation
- are able to understand the unique risks associated with online safety and be confident that they have the relevant knowledge and up to date capability required to keep children safe whilst they are online at school or college
- can recognise the additional risks that children with SEN and disabilities (SEND) face online, for example, from online bullying, grooming and radicalisation and are confident they have the capability to support SEND children to stay safe online
- obtain access to resources and attend any relevant or refresher training courses; and
- encourage a culture of listening to children and taking account of their wishes and feelings, among all staff, in any measures the school or college may put in place to protect them.

In addition to the formal training set out above, their knowledge and skills should be refreshed (this might be via e-bulletins, meeting other designated safeguarding leads, or simply taking time to read and digest safeguarding developments) at regular intervals, as required, and at least annually, to allow them to understand and keep up with any developments relevant to their role.

DSL and dDSL can seek further information from the link below to help identify when to call the Police. This further reiterates the information from Working Together to Safeguard Children (link made available).

Raise Awareness

The designated safeguarding lead should:

- ensure the school's Safeguarding (Child Protection) Policies are known, understood, and used appropriately
- ensure the school's child protection policy is reviewed annually (as a minimum) and the procedures and implementation are updated and reviewed regularly, and work with governing bodies or proprietors regarding this
- ensure the child protection policy is available publicly and parents are aware of the fact that referrals about suspected abuse or neglect may be made and the role of the school or college in this; and
- link with the safeguarding partner arrangements to make sure staff are aware of any training opportunities and the latest local policies on local safeguarding arrangements.
- help promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff. Their role could include ensuring that the school and their staff, know who these children are, understand their academic progress and attainment and maintain a culture of high aspirations for this cohort; supporting teaching staff to identify the challenges that children in this group might face and the additional academic support and adjustments that they could make to best support these children.

Child Protection File

Where children leave the school or college (including for in-year transfers) the designated safeguarding lead should ensure their child protection file is transferred to the new school or college as soon as possible. This should be transferred separately from the main pupil file, ensuring secure transit, and confirmation of receipt should be obtained. Receiving schools and colleges should ensure key staff such as designated safeguarding leads and SENCOs or the named person with oversight for SEN in colleges, are aware as required. In addition to the child protection file, the designated safeguarding lead should also consider if it would be appropriate to share any information with the new school or college in advance of a child leaving. For example, information that would allow the new school or college to continue supporting victims of abuse and have that support in place for when the child arrives.

Availability

During term time the Designated Safeguarding Lead (or a deputy) should always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Whilst the Designated Safeguarding Lead (or deputy) would be expected to be available in person, it is a matter for individual schools, working with the designated safeguarding lead, to define what "available" means and whether in exceptional circumstances availability via phone and or Skype or other such media is acceptable. It is a matter for individual schools and colleges and the designated safeguarding lead to arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Records, Monitoring and Transfer

Well-kept records are essential to good child protection practice. All staff are clear about the need to record, and report concerns about a child or children within the school. Records of concerns are written down or directly added to the school MiS system and signed, this will be electronically when completed on the MiS system and dated and passed immediately to the Designated Safeguarding Lead (or a Deputy). When completed on the MiS system this automatically sends to the school DSL Team.

All Safeguarding concerns, discussions and decisions made, and the reasons for those decisions logged writing within the school MiS system which should include:

- a clear and comprehensive summary of the concern
- details of how the concern was followed up and resolved
- a note of any action taken, decisions reached and the outcome.

If in doubt about recording requirements, staff should discuss with the Designated Safeguarding Lead (or deputy).

The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be held or shared with other agencies (in accordance with the Data Protection Act 2018 and GDPR principles) when promoting children's welfare.

Records relating to actual or alleged abuse or neglect are stored apart from normal pupil or staff records. Normal records sometimes have markers to show that there is sensitive material stored elsewhere. This is to protect individuals from accidental access to sensitive material by those who do not need to know.

- Child protection records are stored securely, with access confined to specific staff, e.g., the Designated Safeguarding Lead (and relevant deputies) and Principal.
- Child protection records are reviewed regularly to check whether any action or updating is needed. This includes monitoring patterns of complaints or concerns about any individuals and ensuring these are acted upon. A case file

chronology, summarizing case activity and significant events in the child's life, helps to enable effective monitoring. Any actions taken are clearly indicated.

- When children transfer school, their safeguarding records are also transferred. Safeguarding records will be transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving school [or 6th form / FE college], with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. Where a child needs specific ongoing support, relevant information will be transferred prior to the child arriving at their new school. In the event of a child moving out of area and a physical handover not being possible then the most secure method should be found to send the confidential records to a named Designated Safeguarding Lead and a photocopy kept until receipt is confirmed. Files requested by other agencies e.g., Police, are copied.

At Wolfdale School staff will directly speak to a DSL/dDSL, where unavailable to speak directly access is provided via telephone. Staff can request this from the school office.

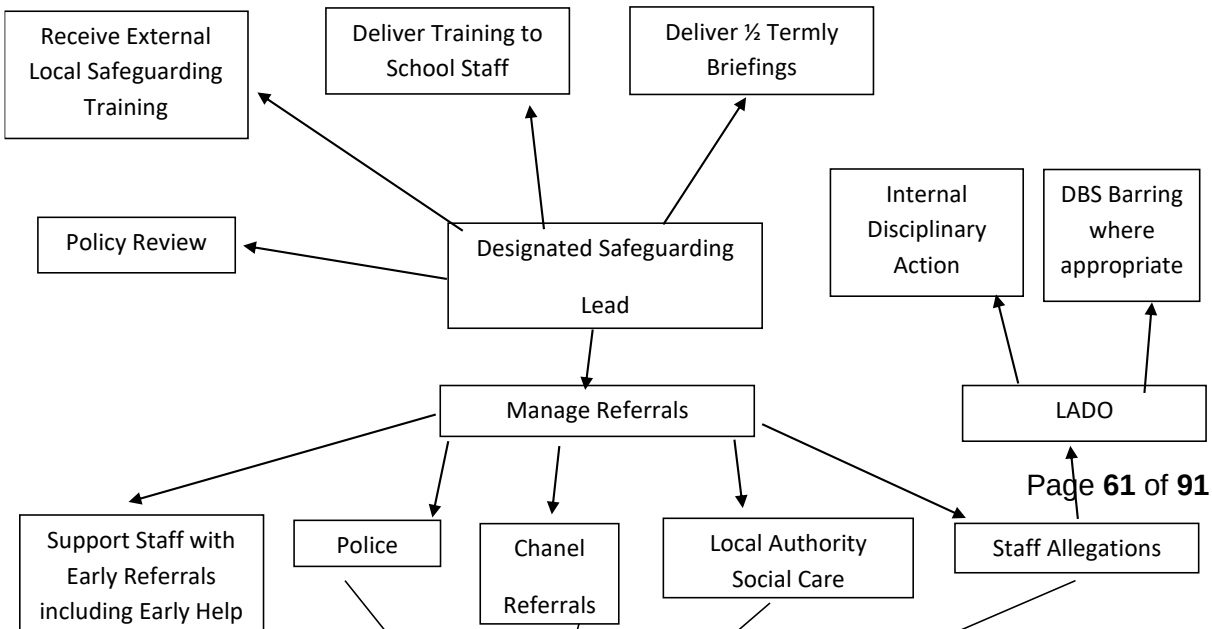
Outside of term time the school provide advice to families/guardians where they can seek support should they need.

NPCC
https://www.npcc.police.uk/documents/Children%20and%20Young%20people/When%20to%20call%20the%20police%20guidance%20for%20schools%20and%20colleges.pdf
Working Together to Safeguard Children 2018
https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

The Map below identifies that the DSL/dDSL work in collaboration with the relevant Safeguarding Partners which include the Local Authority and Police. Where necessary the DSL will attend meetings to ensure relevant sharing of information and the implementation of actions and recommendations.

Within the school structure there are monthly Safeguarding meetings held with the DSL and dDSL.

22.1 - <u>The Role of DSL Diagram</u>



Part 3: Recruitment

23 - Safer Recruitment

Wolfdale school is an equal opportunities employer which seeks to promote the employment of all people including those with disabilities, regardless of gender, race or religious beliefs. Our recruitment process is in accordance with best practice detailed in KCSIE (September 2023)- Part 3 Safer Recruitment and aims to promote our schools Equality Policies values.

Wolfdale school prevent people who pose a risk of harm by working with children, whether paid by the school or not, from being on site. This is done by performing relevant checks and having a robust recruitment process/policy in place. The school not only adheres to all required statutory responsibilities, but where proportionate

and appropriate deeper checks are needed then they will be carried out even where not mentioned in the policy.

All visitors, contractors and volunteers will be supervised by a member of Wolfdale staff who have had their checks completed.

23.1 - Recruitment Process:

1. Vacancies will normally be advertised internally and /or externally depending on the role and skill set required.

2. All applications must be submitted on the Wolfdale School application form.

3. All applicants that identify themselves as having a disability will be offered an interview if skill set meets person specification.

4. Applications will be reviewed, and suitable candidates invited for interview. as part of the shortlisting process the school will carry out an online search as part of due diligence on the shortlisted candidates, they are informed of this. This is to help identify any incidents or issues that have happened, and are publicly available online, which the school or college might want to explore with the applicant at interview.

5. Applications from unsuccessful candidates will be retained and archived in accordance with documented retention periods.

6. A formal or informal interview will always be conducted; Formal interviews will be the preferred option for all roles; however, an informal interview will be conducted where deemed necessary for the specialism of the role or the candidate.
Formal interviews will normally be conducted by at least 2 members of staff, at least one of which will be a member of the management or school director. Candidates will be interviewed using a single set of questions, with answers documented and rated, to ensure a fair selection of the successful candidate.
An informal interview will be conducted by 1 or 2 members of staff which will always again include at least one manager or director. An informal interview record will be compiled and retained on file.
All interviews will have at least one member of staff who has completed the local authority “Safer Recruitment” training program on the panel. These consist of both senior management and HR admin staff.

7. The applicant will be required to supply information and evidence of their right to work in the UK, their fitness to carry out the duties (mentally or physically) applied for and any other role specific requirements. These will be recorded in the application process, along with any reasonable adjustments necessary for the applicant to carry out their role.
Checks made that render the applicant unsuitable to continue with the employment process will be recorded and held in writing.

8. Successful candidates will receive a conditional job offer in writing via letter or email, the offer will be conditional subject to the receiving of satisfactory references

and receipt of a completed Wolfdale School DBS check. The worker may be able to commence duties before the Wolfdale DBS certificate and references are received. However, the individual person will be supervised appropriately until all checks are received. None of these impact on the compulsory requirements for pre-employment checks.

9. Wolfdale will always seek a minimum of 2 references, however in circumstances where only 1 relevant reference is available (e.g., one long term previous employer), consideration will be given to the application and a relevant safeguarding assessment made on a case-by-case basis. Where a professional second reference is not available an alternative personal reference will be obtained, where possible this will be related to other relevant activities i.e.: voluntary work with sports clubs etc.

10. An enhanced DBS (Annex E gives full break down of the flow of checks) with a barred list check will be carried out for all staff, whether paid or not, who are engaging in regulated activity, all relevant roles will be subject to a prohibition check and Section 128 Direction check where necessary, this includes proprietors, governing bodies, head teacher senior leadership and any teaching positions or leadership. As further information an individual who is subject to a section 128 direction is unable to: take up a management position in an independent school, academy, or in a free school as an employee; be a trustee of an academy or free school trust; a governor or member of a proprietor body of an independent school; or, be a governor on any governing body in an independent school, academy or free school that retains or has been delegated any management responsibilities.

The school uses the TRA, Teacher Employer Access service for prohibitions, directions, sanctions, and restrictions and has a DfE account to access these. This service is also used to confirm qualified teacher status where required.

If a conviction is shown on the DBS certificate, the Safeguarding and other risks will be assessed by the management and DSL. If it is deemed that the conviction prevents no current Safeguarding or other risks to the school, students, or staff, then the school may choose to still employ the candidate. Where applicable, DSL approval will be retained on file. No member of staff will be employed if there is reason to suspect or believe that they have been barred.

11. All professional qualifications will be verified, and Qualified teacher status (QTS) checked through the teacher services system where applicable.

12. Checks will be carried out to confirm their identity –
Documents received will include 3 forms of ID such as passport, driving, utility bill, birth certificate etc. Birth certificate being an essential ID document where able to obtain.

13. Staff who have worked overseas will be assessed in conjunction with the DSL on a case-by-case basis as to whether further checks are necessary. Where staff have had casual jobs overseas for example, as part of a gap year, the timescales and nature of the roles undertaken must be assessed and a file note appended to the

staff file accordingly. If staff have worked in an education role further check must be undertaken and / or a file note appended to the staff file as appropriate.

14. Right to work in the UK checks will be carried out in accordance with Home Office regulations and a record of the check and documents retained on file accordingly.

15. All new staff will receive a contract pack with all relevant documentation, school policies for reading covering Health and Safety, Safeguarding, Behaviour, E-safety, KCSIE -Part 1 and the Safer working practice - code of conduct together with copy of the Staff Handbook. All new staff will receive an Induction which includes Safeguarding and Prevent training.

16. All employees, specialist service providers, volunteers/work placements will be added to the SCR. The SCR is held on a spreadsheet and is to be shortly moved to Databridge along with all relevant qualifications, training, and CPD.

17. All ancillary workers, supply staff and other temporary workers will be added to a tracking spreadsheet and removed accordingly. Should the school use a contractor that will need to be on site for a period of time, will need to be unsupervised due to work being carried out, constant supervision is not achievable, and the work is unable to be completed during holiday time a DBS check will be obtained and this will be recorded on the tracking spread sheet. The manager organising the contractor visits must ensure they discuss how the contractor will be monitored with the Lead DSL in advance of the contractor being booked.

22.2 - Ancillary Workers

These are staff who are not employed by Wolfdale School but will be working on site periodically from time to time. These staff will be added to the tracking spreadsheet and be subject to an ID and enhanced DBS check and will be provided with the safeguarding in education induction leaflet.

23.3 - Specialist Service Providers

These are staff not employed by Wolfdale School but provide specialist teaching or educational services to the school e.g.: Swimming, Forest Schooling, Bike Maintenance, IT etc. These specialist providers will be subject to an ID and enhanced DBS check and will be required to read the following policies before taking up the role: Health and Safety, Safeguarding, Safer working practice - code of conduct, KCSIE Part 1 and Behaviour Policy. These staff will be added to the SCR. These staff will be kept updated with revisions of the relevant policies e.g.: KCSIE part 1 revision.

23. 4 – Volunteers/work placements

To share good practice and expertise and assist with vocational training, from time to time we accept volunteer work placements. They will be over 16, subject to an ID and enhanced DBS check and will be required to read the following policies before taking up the placement: Health and Safety, Safeguarding, Safer working practice -

code of conduct and Behaviour Policy. We will also take one reference for each volunteer placement. A risk assessment would be carried out to establish appropriate supervision. These staff will be added to the SCR for the duration of their voluntary period.

23.5 - Supply Staff and Other Temporary Workers

The school do not use supply staff or other temporary workers however should the need ever arise school will require evidence of the same or equivalent standard of safeguarding checks. Wolfdale school would obtain written notification from any agency or third-party organisation that it has carried out necessary safer recruitment checks that the school would otherwise perform. The persons identification would also be confirmed on arrival to confirm it is the same person.

23.6 - Outside Contractors/Visitor

None of these regulations refer to outside contractors/visitor unless they are involved in regulated activity (Annex D). They will not adhere to the recruitment policy and/or requirements. However, they will never be on site unsupervised whilst the students are on the premises. Any contractor involved in the delivery of regulated activity or regular contact with students will however be required to have DBS check and a barred list check. Should the school use a contractor that will need to be on site for a period of time, will need to be unsupervised due to work being carried out, constant supervision is not achievable, and the work is unable to be completed during holiday time, a DBS check will be obtained, and this will be recorded on the tracking spread sheet. The manager organising the contractor visits must ensure they discuss how the contractor will be monitored with the Lead DSL in advance of the contractor being booked.

23.7 - Proprietors

The Department of Education carried out the relevant checks on both the proprietors Gemma Thompson and Tony Blanchard when registering the school.

23.8 - DBS

Staff will be re checked on a 3 yearly basis to ensure that their status has not changed. If the school believes or suspects that a staff members suitability to work raises concern, all relevant checks will be carried out as if a new member of staff. In line with legal requirement the school will report to the DBS anyone they know to have been given a caution or conviction.

23.9 - Recruitment Procedure:

The documentation used in the recruitment process is:

1. Application Form
2. Referencing Form
3. Staff File Checklist
4. Pre-employment Health Declaration

5. Policy Sign off Sheet
6. GDPR Consent Form
7. Emergency Contact Form

Copies of DBS certificates and records of criminal information disclosed by the candidate are covered by UK GDPR/DPA 2018 Article 10. To help schools and comply with the requirements of the Data Protection Act 2018, when a school or college chooses to retain a copy, there should be a valid reason for doing so and it should not be kept for longer than six months. When the information is destroyed a school or college may keep a record of the fact that vetting was carried out, the result and the recruitment decision taken if they choose to. Schools and colleges do not have to keep copies of DBS certificates, in order to fulfil the duty of maintaining the single central record.

Appendix

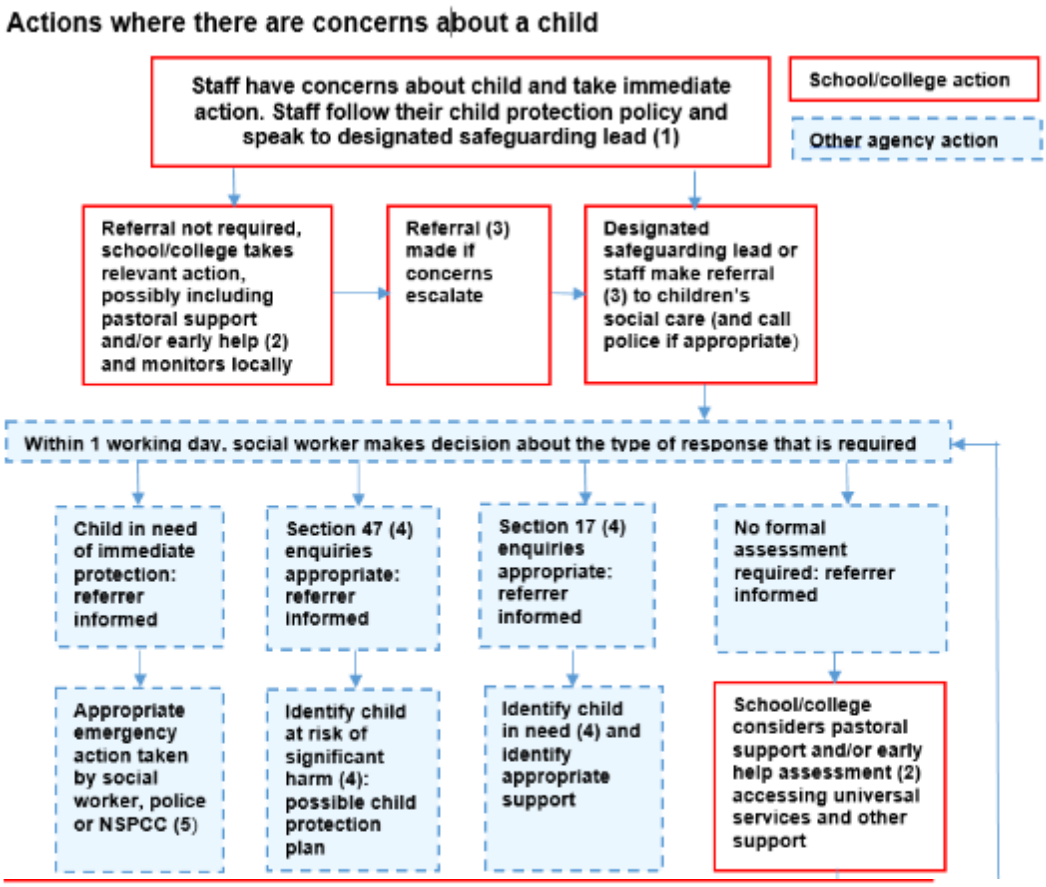
Annex A – Dealing with Concerns	Annex B – Early Help	Annex C –FGM	Annex D – Regulated Activity
Annex E – DBS Flow Chart	Annex F – Prevent Risk Assessment	Annex G – Low Levels Concerns Policy	Annex H – Useful Links

Links/Guidance Used in Creating This Policy

Keeping children safe in education Statutory guidance for schools and colleges September 2023
KCSIE 2023: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1181955/Keeping_children_safe_in_education_2023.pdf
Independent School Standards April 2019
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/800615/Independent_School_Standards-_Guidance_070519.pdf
Sexual violence and sexual harassment between children in schools and colleges Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads May 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
Channel Duty Guidance Protecting vulnerable people from being drawn into terrorism 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/425189/Channel_Duty_Guidance_April_2015.pdf

The Prevent duty Departmental advice for schools and childcare providers June 2015
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf
Criminal Exploitation of children and vulnerable adults: County Lines guidance September 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/741194/HOCountyLinesGuidanceSept2018.pdf
Sexual violence and sexual harassment between children in schools and colleges Advice for governing bodies, proprietors, headteachers, principals, senior leadership teams and designated safeguarding leads May 2018
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/719902/Sexual_violence_and_sexual_harassment_between_children_in_schools_and_colleges.pdf
Guidance for safer working practice for those working with children and young people in education settings February 2022
https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/d71d6fd8-b99e-4327-b8fd-1ac968b768a4~110/original?tenant=vbu-digital

Annex A



(1) In cases which also involve a concern or an allegation of abuse against a staff member, see Part Four of this guidance.

(2) Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter one of Working Together to Safeguard Children provides detailed guidance on the early help process.

(3) Referrals should follow the process set out in the local threshold document and local protocol for assessment. Chapter one of Working Together to Safeguard Children.

(4) Under the Children Act 1989, 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. Under section 47 of the Children Act 1989, where a local authority has reasonable cause to suspect that a child is suffering or likely to suffer significant harm, it has a duty to make enquiries to decide whether to take action to safeguard or promote the child's welfare. Full details are in Chapter one of Working Together to Safeguard Children.

(5) This could include applying for an Emergency Protection Order (EPO).

Annex B
Early Help Forms

Link to Leicestershire MARF form:
https://leicestershirecc-self.achieveservice.com/AchieveForms/?mode=fill&consentMessage=yes&form_uri=sandbox-publish://AF-Process-5fc464a5-365d-4018-baa8-c81c01a096a5/AF-Stage-4e9d6964-051b-47ec-aacf-48c361b19880/definition.json&process=1&process_uri=sandbox-processes://AF-Process-5fc464a5-365d-4018-baa8-c81c01a096a5&process_id=AF-Process-5fc464a5-365d-4018-baa8-c81c01a096a5

Link to Leicester City MARF Form
https://my.leicester.gov.uk/AchieveForms/?mode=fill&consentMessage=yes&form_uri=sandbox-publish://AF-Process-b3fcc6a3-5330-4a67-a460-eea1837a83ef/AF-Stage-e08f28ff-336f-4911-ab41-8cc5c21651ec/definition.json&process=1&process_uri=sandbox-processes://AF-Process-b3fcc6a3-5330-4a67-a460-eea1837a83ef&process_id=AF-Process-b3fcc6a3-5330-4a67-a460-eea1837a83ef

Annex C

FGM Information

Home Office

New duty for health and social care professionals and teachers to report female genital mutilation (FGM) to the police

What is the new duty?

On 31 October 2015 a new duty was introduced that requires health and social care professionals and teachers to report 'known' cases of FGM in girls aged under 18 to the police.

For example, if a doctor sees that a girl aged under 18 has had FGM they will need to make a report to the police. Or, if a girl tells her teacher that she has had FGM, the teacher will need to report this to the police.

What will happen after the case has been reported to the police?

FGM is a serious crime and the police will need to investigate each reported case appropriately. The police will work with social care professionals to make sure that the girl is safe and her needs are put first.

Why is it being introduced?

When a girl has undergone FGM, a serious crime has taken place so it is very important that the police are involved as soon as possible. This will make sure that a proper investigation can take place.

The purpose of the new duty is to help make sure that professionals have the confidence to confront FGM and to help increase the number of referrals to the police so that cases can be investigated appropriately.

What the new duty won't do

It **doesn't mean** that police will take action without consulting appropriately with social care professionals and other relevant professionals.

It **won't require** professionals to report cases to the police where they suspect FGM may have been carried out or think a girl may be at risk. The duty also doesn't apply to women aged 18 or over. Professionals will follow existing safeguarding procedures in these cases.

Summary: Mandatory reporting of FGM*

Duty applies to regulated health and social care professionals and teachers in England and Wales.

Requires these professionals to make a report to the police if, in the course of their professional duties, they:

- are informed by a girl under 18 that an act of FGM has been carried out on her; or
- observe physical signs which appear to show that an act of FGM has been carried out on a girl under 18 and have no reason to believe that the act was necessary for the girl's physical or mental health or for purposes connected with labour or birth.

*introduced in Section 5B of the FGM Act 2003, as inserted by section 74 of the Serious Crime Act 2015

Annex D- Regulated Activity

Regulated activity

The full legal definition of regulated activity is set out in Schedule 4 of the Safeguarding Vulnerable Groups Act 2006 as amended by the Protection of Freedoms Act 2012. HM Government has produced a Factual note on regulated activity in relation to children: scope.

Regulated activity includes:

a) teaching, training, instructing, caring for (see (c) below) or supervising children if the person is unsupervised, or providing advice or guidance on physical, emotional or educational well-being, or driving a vehicle only for children;

b) work for a limited range of establishments (known as 'specified places', which include schools and colleges), with the opportunity for contact with children, but not including work done by supervised volunteers.

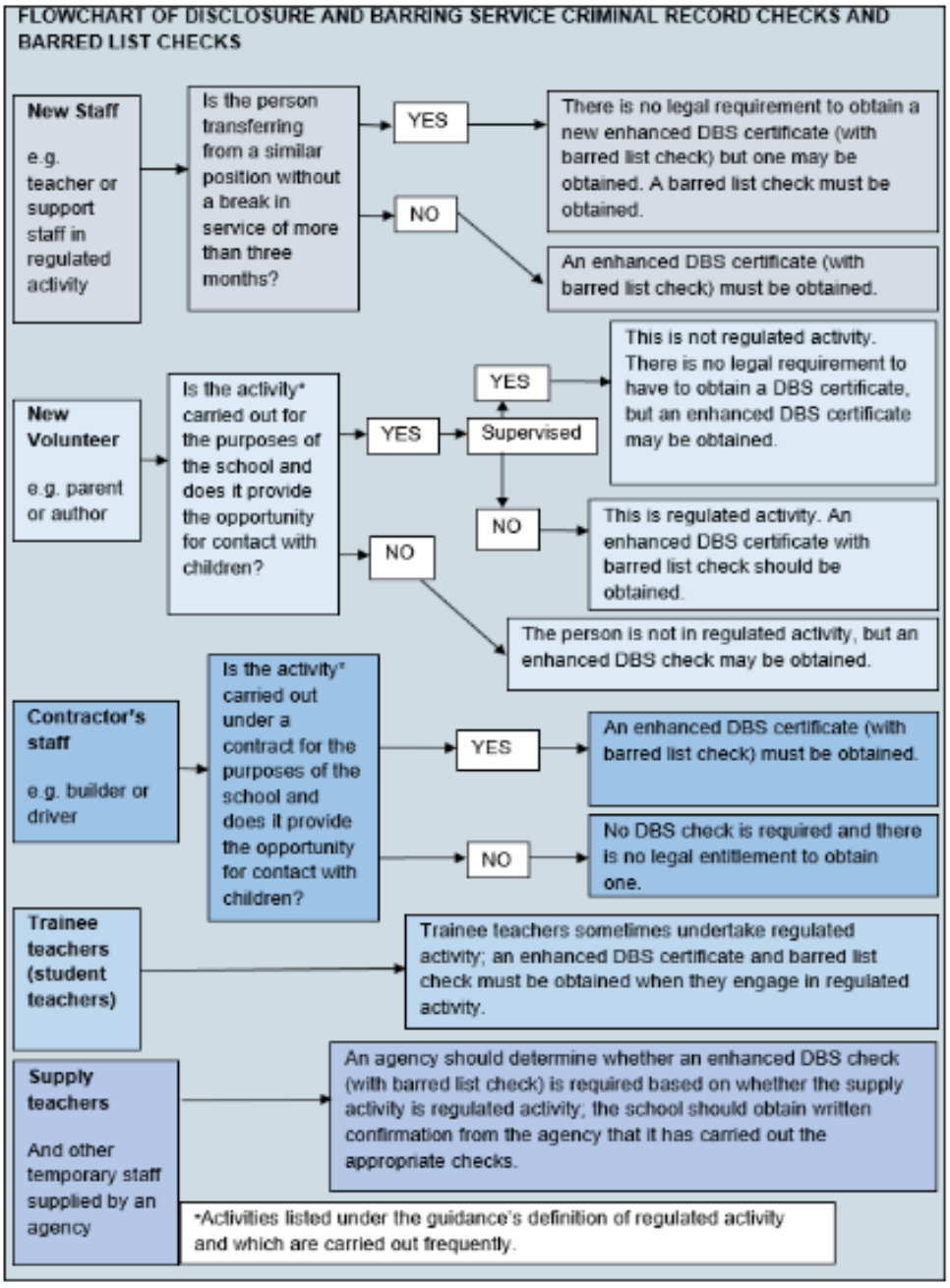
Work under (a) or (b) is regulated activity only if done regularly.[48] Some activities are always regulated activities, regardless of frequency or whether they are supervised or not. This includes:

c) relevant personal care, or health care provided by or provided under the supervision of a health care professional:

- personal care includes helping a child with eating and drinking for reasons of illness or disability or in connection with toileting, washing, bathing and dressing for reasons of age, illness of disability;[49]
- health care means care for children provided by, or under the direction or supervision of, a regulated health care professional.

[48] The Safeguarding Vulnerable Groups Act 2006 provides that the type of work referred to at (a) or (b) will be regulated activity if "it is carried out frequently by the same person" or if "the period condition is satisfied". Paragraph 10 of Schedule 4 to this Act says the period condition is satisfied if the person carrying out the activity does so at any time on more than three days in any period of 30 days and, for the purposes of the work referred to at (a), apart from driving a vehicle only for children, it is also satisfied if it is done at any time between 2am and 6am and it gives the person the opportunity to have face to face contact with children.
[49] It is not intended that personal care includes such activities as, for example, parent volunteers helping with costumes for school plays or helping a child lace up football boots.

Annex E- DBS Chart



Annex F- Prevent Risk Assessment

PREVENT RISK ASSESSMENT FORM

VENUE/ADDRESS~ **Wolfdale School – Anstey, Victoria Rad**
ASSESSOR/JOB TITLE~ **Sachin Dogra – Principal, DSL**
SIGNATURE~

DATE ~ **19/11/2020 – 21/05/2021-14/07/2022-August 2023**
SETTING THE SCENE

The school is lucky to be based within Leicester allowing for experiences and exposures to a range of cultures, religions, races, and groups. The school's aim is for all children is to be able to live a life they choose, free of discrimination and harm. The curriculum activities are organised to promote a wide range of differences and learning experiences that incorporate British Values.
British Values promote the importance of allowing a society that includes democracy, the rule of law, individual liberty and the mutual respect and tolerance of different faiths and beliefs with many faiths, no faiths and beliefs and does not call for the death of armed services.

Extremists look to dismantle these fundamental values to radicalise individuals for their own cause.

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

The risk assessment below indicates the core steps taken to 'Prevent' the risk of students being a radicalised and to be protected from extremist views.
The school complete an individual Safeguarding Risk Assessment for those that have Concerns raised. This Risk Assessment assess the range of safeguarding risks including radicalisation.

RISK MATRIX

https://wolfdaleschoolanstey-my.sharepoint.com/personal/sachin_dogra_ /2023
UPDATE/SAFEGUARDING POLICY Sept 2

WHAT ARE THE HAZARDS WHICH MAY BE CAUSED State the hazard and any injuries that might be caused	**WHO/WHAT MAY BE HARMED?** give specific groups of people e.g., staff, visitors, contractors, students, residents, cleaners, disabled etc. and estimate numbers; include significant property damage	**WHAT IS DONE NOW?** provision of training, corporate and local standards complied with, existing codes of safe working practice, protective equipment, guarding, supervision, monitoring systems, specific assessments under health and safety regulations e.g., COSHH, DSE, noise, manual handling, fire etc.	**HOW BAD IS THE RISK?** use the risk assessment matrix system to evaluate the risk	**WHAT NEEDS TO BE DONE**? What action should be taken or needs to be considered in order that the risks identified are effectively controlled Include in action plan	**BY WHEN AND BY WHOM?** What is the target date for completion? Include in action plan
Staff or other contracted providers (e.g., regular supply or agency staff) are not aware of the school procedure for handling concerns and or do not feel comfortable sharing issues internally	• Students • Staff • Families/ Guardians • Public	• Designated Safeguarding Lead to have received 'Prevent' awareness training and has disseminate the training and salient points to all staff, Directors, and other regular contracted staff in the setting • Contracted staff are made aware of the person to whom concerns are to be reported • Preventing students from being exposed to radicalisation or extremism is part of Safeguarding policies and procedures	Low Green 4	• Prevent refresher required for staff through employment	

		including E-safety, Anti-Bullying, Behaviour • Staff have received appropriate training and are familiar with our Safeguarding Policy and procedures • Concerns are reported to the DSL • Records are held of any referrals with an audit trail being maintained – regular monitoring by the DSL takes place • Staff complete Online Prevent training which is part of the Induction Process			
Students are radicalised by factors internal or external to the school	• Students • Staff • Families/ Guardians • Public	• The school has an approach to use a range of activities to promote the spiritual, moral, social and emotional needs of students. The aim is to provide a greater understanding of positive rights and to protect them from radical and extremist influences • Students will develop critical thinking around influence, social media and other on-line safety	Low Green 4		

		• Staff are aware to challenge students' opinions or language that is contrary to community cohesion or 'British values' • Staff are able to challenge students, parents or Directors if opinions expressed are contrary to community cohesion or 'British values' • Staff are aware of local factor i.e., political views etc. which might have an influence on students			
School does not work with statutory partners and agencies and/or does not feel comfortable sharing extremism related concerns externally	• Students • Staff • Families/ Guardian • Public	• We communicate regularly with statutory partners and agencies regarding a range of concerns • All staff are aware that concerns are reported to the DSL • We have an appropriate internal referral process in place for all child protection matters including extremism and the DSL is aware of how to expedite concerns to other agencies.	Low Green 4		
Students are exposed by school staff or contracted providers to messages supportive of extremism, terrorism or which contradicts 'British values'	• Students • Staff • Families/ Guardian • Public	• We have appropriate whistleblowing procedures and a range of 'safeguarding' policies which are known and understood by staff,	Low Green 4		

		volunteers and regular contracted staff • Staff and other adults working with students are challenged if opinions or language expressed are contrary to community cohesion or 'British values' • Opportunities to promote 'British values' are clearly identified within all curriculum areas • Areas of the curriculum e.g., PSHE are used for controlled and safe debate and discussion on radical or extreme issues and ideologies • We have appropriate filters in place which reduce the risk of students being able to access inappropriate information via the school IT system.			
Behaviours which harm the ability of different groups and individuals to learn and work together are left unchallenged	• Students • Staff • Families/ Guardian • Public	• Students are taught about respect for other cultures and gain an understanding of community cohesion • Opportunities are created both within the environment and the curriculum to promote the setting's inclusive ethos and values • Whole School	Low Green 4	• Displays and other literature available in school reflects and encourages diversity and community cohesion	

		Behaviour Policy includes information on anti-bullying strategies and preventative measures for dealing with bullying • Inappropriate behaviour, language and attitudes are challenged by staff and, where staff or other adults are involved, by Leaders			
Staff or contracted providers are not aware of/do not subscribe to the ethos and values of the school	• Students • Staff • Families/ Guardian • Public	• Leadership Team are aware of the 'Prevent' Strategy and its objectives as it relates to both the national and local context and take steps to ensure that the overall values and ethos of the school reflect strategies to support the 'Prevent' duty • Clear awareness of roles and responsibilities regarding 'Prevent' exist across the school • Recruitment, selection and induction programmes exist which include reference to the ethos and values of the school		Evidence of the Leadership Team and the Prevent Strategy Staff development programmes include reference to 'British values' and to the promotion of community cohesion Guidance and literature are available for staff on the 'Prevent duty' and local aspects of extremism and radicalisation -	

		• A process is in place to identify and develop 'lessons learned' identified either by us or by other organisations/advisers			
Staff are unable to raise extremism related organisational concerns due to the lack of an appropriate whistleblowing procedure	• Students • Staff • Families/ Guardian • Public	• Appropriate whistleblowing procedures are in place and adults working with students are made aware of them • Records are kept of incidents which are reported to the DSL for consideration and, where appropriate, are referred on to the appropriate agency	Low Green 4		
Students/staff are exposed by visiting speakers to messages supportive of extreme ideologies or which contradict 'British values' Extremist or terrorist related material is displayed within the setting	• Students • Staff • Families/ Guardian • Public	• Materials to be delivered by external speakers are discussed with the speaker prior to delivery • Visiting speakers are not left alone with students • The appropriateness and relevance of all materials or literature are considered prior to display • Staff concerns are discussed with the DSL before materials are used • Requests for externally provided materials to be displayed are considered and, where appropriate, authorised by the Head teacher	Low Green 4		

Students access extremist or terrorist material whilst using school networks	• Students • Staff • Families/ Guardian • Public	• The ICT network has appropriate filters which block sites which are deemed to be inappropriate • School has robust acceptable use procedures for both students and staff • Students are encouraged to report to an adult any material which leaves them feeling worried or uncomfortable	Low Green 4	- Students who access the internet through their personal Data which does not run through the school's ICT network and should be overseen by staff. - If there are concerns regarding staff or students, the school can review and monitor their E-mail accounts for content	
On-line/social media communications relating to extremist or terrorist materials feature the school's branding	• Students • Staff • Families/ Guardian • Public	Currently the school do not use social media. The school has a website where we have oversight of, or administration rights for	Low Green 1		
Web Filtering and Monitoring	• Students • Staff • Families/ Guardian • Public	The school have a web filter in place to restrict access to material that could harm or risk radicalisation. Students who access personal devices		Students who attempt or access material of harm: - An alert is sent to ICT Technician - ICT Technician informs DSL Team (on the day) - DSL Team assess next steps, this may include police, or referral to Channel. Outcome may include steps with Channel, Police or Curriculum input to educate. Where Teachers are required to access information or resources online to support learning must	

				inform dDSL prior and inform ICT Technician. Students accessing personal devices not connected to web filter using 3g/4g/5g: - Staff to remain vigilant to what is accessed. - Where appropriate ask the student. - Monitor for any signs linked to radicalisation or abuse including language, behaviours whether escalating or appearing withdrawn. - Staff should immediately report concerns to DSL or dDSL.	

Students access extremist or terrorist materials out of the school setting	• Students • Staff • Families/ Guardian • Public	• Parents of students that have been identified as potential concern have had advice shared on monitoring internet usage and signposted to advice • The school recognise that many students present as isolated and spend a high amount of time online. There is a consistent risk that outside of school this usage is not monitored. As a result, the school will keep this as a risk that needs monitoring and address as per Safeguarding Actions	Yellow 8	• Need to provide parents/guardians advice on where they can access information and support in relation to on-line extremism and radicalisation and how to help keep their children safe on-line	

Annex G- Low Levels Concerns Policy

Low-Levels Concerns Policy

Intent

This policy aims to ensure the safety and welfare of all students at Wolfdale School. Keeping Children Safe in Education 2023 identifies where staff are expected to report concerns, no matter how small, about their own behaviour or that of another member of staff, volunteer, supply teacher, contractor or other person working in school.

Its purpose is to help create and embed a culture of openness, trust and transparency in which the clear values and expected behaviour set out in the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019) (sometimes called the safeguarding code of conduct) are lived, monitored, and reinforced.

The policy should be read in conjunction with the current statutory guidance – "Keeping Children Safe in Education" Part 4, Section 2.

This policy applies to all staff and other individuals who work or volunteer in school.

Policy –

Definition of a low-level concern

A low-level concern is any concern, no matter how small, even if no more than causing a sense of unease or a 'nagging doubt', that a person working in or on behalf of the school may have acted in a way that:

- is inconsistent with the "Guidance for safer working practice" (May 2019), including inappropriate conduct outside of work, and
- does not meet the allegations threshold or is otherwise not considered serious enough to make a referral to the LADO.

Reporting low-level concerns

Where a low-level concern has been identified this will be reported as soon as possible to the **Principal**. However, it is never too late to share a low-level concern if this has not already happened.

Where the Principal who is the Designated Safeguarding Lead is not available, the information will be reported to a Deputy Designated Safeguarding Officer. When this has been reported the dDSL they will inform the Principal as soon as possible.

Low-level concerns about the Deputy Designated Safeguarding Lead will be reported to the Principal.

Low-level concerns about the Principal/ Designated Safeguarding Lead will be reported to Gemma Thompson.

Director Deputy DSL (dDSL)	Gemma Thompson	Gemma.thompson@wolfdaleschool.leics.sch.uk 0116 235 5600

Recording concerns

Staff must immediately inform the DSL or dDSL and then complete a written summary of the low-level concern. This should be written down, signed, timed, dated and shared by the person bringing the information. This will be completed on the school's MiS system Event Log – STAFF Safeguarding.

Responding to low-level concerns

Where a low-level concern has been raised this will be taken seriously and dealt with promptly. The Principal will:

- Speak to the person reporting the concern to gather all the relevant information.
- Speak to the individual about the concern raised to ascertain their response, unless advised not to do so by the LADO or Police (HR advice may also need to be taken).
- Where necessary further investigation will be carried out to gather all relevant information. This may involve speaking to any potential witnesses.
- The information reported and gathered will then be reviewed to determine whether the behaviour,

    i) is consistent with the "Guidance for safer working practice for those working with children and young people in education settings" (May 2019): no further action will be required,

    ii) constitutes a low-level concern: no further action is required, or additional training/guidance/support may be required to rectify the behaviour via normal day to day management processes. The employee should understand that failure to improve or a repeat of the behaviour may lead to further action being taken, e.g., via the Performance Management Policy.

    iii) is serious enough to consult with or refer to the LADO: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Performance Management Policy will be followed.

    iv) when considered with any other low-level concerns that have previously been raised about the same individual, should be

reclassified as an allegation and referred to the LADO or Police: a referral should be made to the LADO and advice taken from HR. In this case the school's Managing Allegations procedure within the Safeguarding Policy and Performance Management Policy will be followed.

v) Low-level concerns which are shared about supply staff and contractors should be notified to their employers, so that any potential patterns of inappropriate behaviour can be identified.

- Records will be made of

  i) all internal conversations including any relevant witnesses,
  ii) all external conversations e.g., with the LADO
  iii) the decision and the rationale for it,
  iv) any action taken.

Can the reporting person remain anonymous?

The person bringing forward the concern will be named in the written record. Where they request to remain, anonymous this will be respected as far as possible. However, there may be circumstances where this is not possible e.g., where a fair disciplinary investigation is needed or where a later criminal investigation is required.

Should staff report concerns about themselves (i.e., self-report)?

It may be the case that a person finds themselves in a situation which could be misinterpreted or might appear compromising to others; or they may have behaved in a manner which on reflection they consider falls below the standard set out in the "Guidance for safer working practice". In these circumstances they should self-report. This will enable a potentially difficult situation to be addressed at an early opportunity if necessary.

Where behaviour is consistent with the "Guidance for safer working practice" (May 2019)

Feedback will be given to both parties to explain why the behaviour was consistent with the "Guidance for safer working practice".

Should the low-level concerns file be reviewed?

The records will be reviewed periodically, and whenever a new low-level concern is added, so that potential patterns of concerning, problematic or inappropriate behaviour can be identified and referred to the LADO if required. A record of these reviews will be retained.

References

Low-level concerns will not be included in references unless a low-level concern, or group of concerns, has met the threshold for referral to the LADO and found to be substantiated.

What is the role of the Governing Body?

The Principal will regularly inform the Governing Body about the implementation of the low-level concerns policy including any evidence of its effectiveness e.g., with relevant data. The Safeguarding Governor may also review an anonymised sample to ensure that these concerns have been handled appropriately.

Annex H

Links to support learning:

https://tce.researchinpractice.org.uk/ - non-statutory guidance for local areas, developed by the Tackling Child Exploitation (TCE) Support Programme, funded by the Department for Education and supported by the Home Office, the Department for Health and Social Care and the Ministry of Justice

The following resources, plus many more listed in Annex B, may also help schools and colleges understand and teach about safeguarding:
• DfE advice for schools: teaching online safety in schools https://www.gov.uk/government/publications/teaching-online-safety-in-schools
• UK Council for Internet Safety (UKCIS) guidance: Education for a connected world https://www.gov.uk/government/publications/education-for-a-connected-world
• UKCIS guidance: Sharing nudes and semi-nudes: advice for education settings working with children and young people https://www.gov.uk/government/publications/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people/sharing-nudes-and-semi-nudes-advice-for-education-settings-working-with-children-and-young-people
• The UKCIS external visitors guidance will help schools and colleges to ensure the maximum impact of any online safety sessions delivered by external visitors https://www.gov.uk/government/publications/using-external-visitors-to-support-online-safety-education-guidance-for-educational-settings
• National Crime Agency's CEOP education programme: Thinkuknow https://www.thinkuknow.co.uk/
• Public Health England: Every Mind Matters https://campaignresources.phe.gov.uk/schools/topics/rise-above/overview
• Harmful online challenges and online hoaxes - this includes advice on preparing for any online challenges and hoaxes, sharing information with parents and carers and where to get help and support. https://www.gov.uk/government/publications/harmful-online-challenges-and-online-hoaxes

- LGFL 'Undressed' provided schools advice about how to teach young children about being tricked into getting undressed online in a fun way without scaring them or explaining the motives of sex offenders https://undressed.lgfl.net/

Related Policies: Behaviour Policy, E-Safety Policy, Complaints Policy, Positive Handling Policy, Absconding Policy, SMSC Policy, Anti-Bullying (including Cyberbullying) Policy, Transport Policy, First Aid Policy, Health and Safety Policy, Attendance Policy, PSHE a& RSE Policy, Therapy Policy

Policy owned by: SD

Name: *Principal*

Signature:

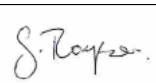
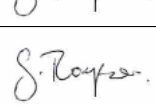
Training Dates		
18.09.2019	**Safeguarding**	Training for 3 x new staff
04.03.2020 10.03.2020	**Safeguarding**	Whole school
25.08.2020 26.10.2020	**Safeguarding**	Whole School – including KCSIE update Sept 2020
30.10.2019	**Safeguarding Update**	Covered – How to report and updates including serious violence, county lines, missing in education and CSE
22.01.2020	**Safeguarding Update**	Covered – Radicalisation, Prevent and Channel
2.03.2020	**Safeguarding Update**	Covered – Intent, Implementation and Impact
27.01.2021	**Safeguarding Induction**	4x new staff- Induction with DSL on first day. Given Safeguarding in Education leaflet as part of session.
12.02.2021	**Safeguarding Training**	Covered- KCSIE update September 2020 and Annex 1
22.02.2021	**Safeguarding Workshop**	9x Staff Covered- Bullying and Radicalisation
25.02.2021	**Safeguarding Workshop**	25x Staff Covered- Bullying and Radicalisation
24.03.2021	**Safeguarding Training**	2x new staff KCSIE 2020 and Annex 1
29.04.2021	**Safeguarding Workshop**	Covered- Peer on peer abuse
28.05.2021	**Safeguarding Workshop**	Whole school- Harmful sexual behaviour
23.08.2021	**Safeguarding Training**	Whole school- KCSIE 2021 update
External training		
27.01.2020	**DSL Training**	GT & KG
04.02.2020	**DSL Training**	SL
16.12.2019	**DSL Refresher**	JW & SD
29.09.2020	**DSL Refresher**	SMc
04.03.2020	**Allegations Management Training**	GT & SD
16.09.2020	**Allegations Management Training**	EC
19.11.2019	**Safer Recruitment Training**	KG & EC

16.11.2020	**Safer Recruitment Training**	GT & AMc
22.12.2020	**Prevent (Online- The Key)**	1x new staff
22.12.2020	**Safeguarding & Child Protection The Essentials 2020/21 (Online- The Key)**	1x new staff
05.01.2021	**KCSIE Part 1 Assessment (Online- The Key)**	Refresher one staff
25.01.2021	**DSL Refresher**	SMc
06.05.2021	**DSL Initial Training**	JA & JR
19.05.2021	**Safer Recruitment (Online- The Key)**	DMc & CD

Version Control:			
Revision Number	Page Number/s	Revision explanation	Date of change
1-4		Created	Feb 2016
5		Reviewed	Sep 2017
6		Reviewed	June 2018
7		Reviewed	Jan 2019
8		Reviewed	Sep 2019
9		Reviewed and checked against Independent School Standards and KCSIE 2019 by Head of School and Director	Dec 2019
10		Updated to include CCE, Cyber Crime and updated Annex A	Jan 2020
11		Updated to include Peer on Peer Abuse Actions and Covid 19 Response	April 2020
12		Minor changes- updated email addresses and edited layout	May 2020
13		Updated to include Peer on Peer Abuse Actions and Covid 19 Response	July 2020
14		Updated with KCSIE September 2020	August 2020
15		Updated annexes in line with KCSIE September 2020 and included links to Part 1 and Annex A	September 2020
16		Updated Annex, Safer Recruitment, FGM, Early Help, Role of DSL, Directors, Contact Information, Prevent	

		RA, Allegations (included areas from Safer Working Practices)	
17		Annex F updated	January 2021
18		Signatures added to Prevent RA, Prevent RA read and checked	May 2021
19		2021 update to include KCSIE 2021 changes	August 2021
20		2022 updated to include KCSIE 2022 changes	August 2022
21		Updated terminology – 'Peer on Peer' updated to 'Child on Child' Attendance paragraph Added DSLs	February 2022
22		Updated following KCSIE 2023	September 2023

Approved Sign off:			
Sign needed by:	Name	Signed	Date
Head of School	Sachin Dogra		21st May 2021
Head of School	Sachin Dogra		31st August 2021
Head of School	Sachin Dogra		31st August 2022
Head of School	Sachin Dogra		15th February 2023
Principal	Sachin Dogra		1st September 2023

Approved Sign off:			
Sign needed by:	Name	Signed	Date
Proprietor	Gemma Thompson		21st May 2021
Proprietor	Gemma Thompson		31st August 2021
Proprietor	Gemma Thompson		31st August 2022
Proprietor	Gemma Thompson		15th February 2023
Proprietor	Gemma Thompson		1st September 2023

Review Date: September 2023