



Pebworth First and Blackminster Middle Schools  
Federation



# Safeguarding and Child Protection Policy Federation

Review date:	September 2022
Written and revised by:	Linda McQuone
Reviewed by:	Phil Jones
Approved by:	Governing Body
Next review:	September 2023

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## Section 1 – Child Protection and Safeguarding 2022 - 2023

<b>Governors' Committee Responsible:</b>	<b>Performance Committee</b>
<b>Governor Lead:</b>	<b>Phil Jones</b>
<b>Designated Safeguarding Lead of Staff:</b>	<b>Linda McQuone</b>
<b>Prevent Lead:</b>	<b>Linda McQuone</b>
<b>Child Exploitation GET SAFE lead:</b>	<b>Linda McQuone</b>
<b>Status &amp; Review Cycle:</b>	<b>Statutory Annual</b>
<b>Next Review Date:</b>	<b>August 2023</b>

## Section 2 – Safeguarding Statement

Pebworth First and Blackminster Middle Schools' Safeguarding /Child protection policy draws upon duties conferred by the Children Acts 1989 and 2004, The Children and Families Act 2014, S175 of the 2020 Education Act, The Education (Independent School Standards) Regulations 2014 (for independent schools), the Non-maintained Special Schools (England) Regulations 2015 (for non-maintained special schools) and the guidance contained in [Working Together to Safeguard Children 2018](#), the DfE's statutory Guidance - [keeping children safe in education](#)

## Section 3 – Key Contacts

### Key Personnel:

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**The Designated Safeguarding Lead (DSL) is Linda McQuone (Neil Champs at Pebworth)**

Contact details:

email: [lmcquone@blackminster.worcs.sch.uk](mailto:lmcquone@blackminster.worcs.sch.uk) / [nchamps@pebworthfirst.worcs.sch.uk](mailto:nchamps@pebworthfirst.worcs.sch.uk)

Telephone: 01386 830311 / 01789 720726

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**The deputy DSL(s) is/are Matt Sandell, Teresa Johnson, Lisa Tanner**

Contact details:

email: [msandell@blackminster.worcs.sch.uk](mailto:msandell@blackminster.worcs.sch.uk), [tjohnson@blackminster.worcs.sch.uk](mailto:tjohnson@blackminster.worcs.sch.uk), [office@pebworthfirst.worcs.sch.uk](mailto:office@pebworthfirst.worcs.sch.uk)

Telephone: 01386 830311

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**The nominated safeguarding governor is Phil Jones**

Contact details:

email: [pjones@blackminster.worcs.sch.uk](mailto:pjones@blackminster.worcs.sch.uk)

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**The Headteacher is Linda McQuone**

Contact details: as above

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**The Chair of Governors is Phil Jones**

Contact details: as above

**Other named staff and contacts:**

- Designated Teacher for Children in Care – Linda McQuone

- Online safety Co-ordinator – Rachel Adkins
- Safeguarding in Education Adviser, WCF Denise Hannibal
- Local Authority Designated Officer/Position of Trust \_\_\_\_\_
- Chanel Chair Paul Kinsella Advanced Public Health Practitioner
- Family Front Door: **01905 822666** (core working hours)  
Out of hours or at weekends: **01905 768020**

[NSPCC's whistleblowing advice line](#) 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 [*school/college*]. The NSPCC whistle blowing helpline number is also available (0800 028 0285).

Staff can call 0800 028 0285 – line is available from 8:00 am to 8:00 pm, Monday to Friday and email: [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

[NSPCC - When to call the police](#)

## Section 4 - Introduction

The Federation recognises the contribution it can make to protect and support pupils in School. The aim of this policy is to safeguard and promote our pupils' welfare, safety, health, and well-being by creating an honest, open, caring and supportive environment. The pupils' welfare is of paramount importance.

This policy is also based on the following legislation:

Keeping Children Safe in Education has been extended from early years, schools and colleges to cover 16-19 academies (and apprenticeships). There is reference to the Education and Training (Welfare of Children) Act 2021 which amends the Education Act 2002 and the Apprenticeships, Skills, Children and Learning Act 2009 and places safeguarding duties on 16 to 19 academies and further education to ensure that safeguarding responsibilities are understood and prohibiting funding being given if safeguarding requirements not complied with.

- Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques
- Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- The Children Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the Serious Crime Act 2015, which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children
- Statutory guidance on the Prevent duty, which explains schools' duties under the Counterterrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

- Where a school or college has charitable status, Charity Commission guidance on charity and trustee duties to safeguard children is available at [Charity Commission Guidance](#)

Our staff are aware of:

[West Midlands procedures:](#)

Welcome to your West Midlands Child Protection and Safeguarding Procedures Manual. Within the West Midlands, there are twelve local areas that collaborate with regards to child safeguarding procedures. With the introduction of *Working Together to Safeguard Children 2018*, each local area's multi-agency safeguarding arrangements are led by the statutory safeguarding partners/organisations: local authorities, clinical commissioning groups and the police.

These child protection and safeguarding procedures are for nine participating areas and are effective from 31<sup>st</sup> March 2017.

### **Background**

A project proposal was successfully submitted to DfE on behalf of the West Midlands Safeguarding Children Partnerships to develop regional safeguarding procedures. It was felt that it would be sensible to move to a more regional approach to multi-agency working around safeguarding, especially in light of the fact that so many partner organisations (including Police, Probation, Health and many others) span an area that crosses local authority boundaries.

[WCF levels of need guidance:](#)

#### Introduction

Working Together to Safeguard Children (2018) requires the safeguarding partners to publish a threshold document which sets out the local criteria for action when an early help response and the criteria for making a referral to local authority children's social care. Effective early help relies upon local organisations and agencies working together to

- identify children and families who would benefit from early help
  - undertake an assessment of the need for early help
  - provide targeted early help services to address the assessed needs of a child and their family which focuses on activity to improve the outcomes for the child
- Local authorities, under section 10 of the Children Act 2004, have a responsibility to promote inter-agency cooperation to improve the welfare of all children. The terms 'early help' and 'early intervention' are often used interchangeably, and this can cause confusion.

The Department for Education and Ofsted both use the term 'Early Help' and this has also been adopted by Worcestershire. The term refers to the support which is needed for children and families at the first sign of additional unmet needs, at any point in the child's life from pre-birth through to 18 years. Providing the right help at the earliest opportunity can help to solve problems before they become more pressing and complex and avert the need for statutory intervention later on in their life. This document is intended to assist professionals to make decisions about how to respond to the needs of the children, young people and families they are in contact or working with. It is not intended to be prescriptive or exhaustive or is a definitive way to open or close a gateway to a particular service or range of services. Every child and family are unique, and their needs should be considered on a case-by-case basis and decisions made using professional judgement, supported by this guidance.

## Section 5 – Management of Safeguarding

The Federation's policy applies to all our staff, governors, volunteers, and visitors to our schools. Child protection is the responsibility of all our staff. We will ensure that we will comply with our duties under all relevant legislation. We will ensure this policy and our procedures are effective and comply with the law at all times, this includes training for all staff.

We will ensure that all our parents and working partners are aware of this policy by mentioning it in our school prospectuses, displaying appropriate information in our receptions and on the school websites and by raising awareness at meetings with our parents/carers.

In Blackminster and Pebworth our Governing body will ensure we facilitate a whole school approach to safeguarding. Ultimately, all our systems, processes and policies will operate with the best interests of the child/children at their heart. Where there is a safeguarding concern, our governing body and school leaders should ensure the child's wishes and feelings are sought and taken into account when determining what action to take and what services to provide. Systems should be in place for children to express their views and give feedback.

**Raising concerns/complaints.** We respond robustly when concerns are raised or complaints made (from children, adults including parent/carers) as we recognise that this promotes a safer environment and we seek to learn from complaints and comments. The federation will take action and seek to resolve the concerns in a timely way, keeping people informed as to progress wherever possible. The federation complaints procedures are available on either of the schools' websites.

All our staff are aware of their duty to raise concerns, where they exist, about the attitude or actions of colleagues using the school's confidential reporting (whistleblowing) policy.

Whistleblowing concerns about the Headteacher should be raised with the Chair of Governors.

Statutory guidance contains further information on: [The Role and Responsibilities of the Designated Teacher](#)

### 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.

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) can be found at Human Rights | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

Guidance to help schools understand how the Equality Act affects them and how to fulfil their duties under the act can be found at Equality Act 2010: advice for schools - GOV.UK ([www.gov.uk](http://www.gov.uk)), it may also be useful for colleges. For further information Equality Act guidance | Equality and Human Rights Commission ([equalityhumanrights.com](http://equalityhumanrights.com)).

## Section 6 – Whole School Approach to Safeguarding

### What federation staff will do if they have concerns about a child

Federation staff working with children are advised to maintain an attitude of '*it could happen here*' where safeguarding is concerned. When concerned about the welfare of a child, staff should always act in the best interests of the child.

If staff have any concerns about a child's welfare, we act on them immediately. If staff have a concern, we follow this safeguarding policy and speak to the designated safeguarding lead (or deputy).

Options will then include:

- managing any support for the child internally via the federation's own pastoral support processes.
- undertaking an early help assessment; or
- making a referral to statutory services, or example as the child might be in need, is in need or suffering, or is likely to suffer harm.

### **Early Help**

Any child may benefit from early help. Federation staff are experienced and appropriately trained to identify early the potential need for early help for a child who:

- is disabled or has certain health conditions and has specific additional needs;
- has special educational needs (whether or not they have a statutory Education, Health and Care Plan);
- has a mental health need.
- is a young carer.
- is showing signs of being drawn in to anti-social or criminal behaviour, including gang involvement and association with organised crime groups or county lines;
- is frequently missing/goes missing from care or from home;
- is at risk of modern slavery, trafficking, sexual or criminal exploitation;
- is at risk of being radicalised or exploited;
- has a family member in prison, or is affected by parental offending;
- is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse;
- is misusing drugs or alcohol themselves.
- has returned home to their family from care;
- is at risk of 'honour'-based abuse such as Female Genital Mutilation or Forced Marriage;
- is a privately fostered child; and
- is persistently absent from education, including persistent absences for part of the school day.

[Our Early Help Offer accessible on our schools' websites. As part of our early offer, we support children and young people by completing an early help assessment.](#)

[Worcestershire Children First Early Help information page](#)

## **Section 7 – Head Teacher**

The Executive Head Teacher of the Pebworth First and Blackminster Middle Schools Federation will ensure that:

- The Safeguarding 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 a child or young person are notified to the Local Authority Designated Officer in a timely manner.
- 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’s Services) or the Police.

## Section 8 – School Governors/Trustees

In accordance with the Statutory Guidance “Keeping Children Safe in Education” September 2022, the federation’s Governing Body will ensure that:

- Child protection/safeguarding policy, procedures and training are in place which are always effective and comply with the law. The policy is made available publicly.
- We will ensure that **all** governors and trustees receive appropriate safeguarding and child protection (including online) training at induction. This training will equip them with the knowledge to provide strategic challenge to test and assure themselves that the safeguarding policies and procedures in place in our federation are effective and support the delivery of a robust whole
- The policy will be reviewed at least annually or more often, for example in the event of new guidance or a significant incident.
- Governors have an enhanced criminal records certificate from the DBS.
- We carry out a section 128 check for school governors, because a person subject to one is disqualified from being a governor.
- We check if a person we recruit as a governor is barred because of being subject to a section 128 direction.
- We operate safer recruitment practices, including appropriate use of references and checks on new staff and volunteers. Furthermore, the Head Teacher, a nominated Governor and other staff involved in the recruitment process have undertaken Safer Recruitment Training
- Procedures are in place for dealing with allegations of abuse against members of staff and volunteers/ people in a position of trust.
- There is a senior member of the federation 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 (at least one deputy) with appropriate arrangements for before/after school and out of term activities.
- 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) via safeguarding e-briefings etc.
- The Head Teacher, and all other staff and volunteers who work with children (including early years practitioners within settings on the school site), undertake appropriate training which is regularly updated (at least every year); and that 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 and Part 1 of Keeping Children Safe in Education 2022). Training includes FGM/Prevent/Child Exploitation.
- Any deficiencies or weaknesses in these arrangements brought to the attention of the Governing Body and will be rectified without delay.
- The Chair of Governors (or, in the absence of a Chair, the Vice Chair) deals with any allegations of abuse made against the Head Teacher, with advice and guidance from the Local Authority Designated Officer (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 October 2015”](#).
- Information is provided to the Local Authority (on behalf of the WSCP) when requested, for example through the Annual Safeguarding Return (e.g. section 175 audit)

- Our school Governing body ensure that children are taught about safeguarding, including online safety. This as part of providing a broad and balanced curriculum.
- There is an individual member of the Governing Body, Phil Jones, who will champion issues to do with safeguarding children and child protection within the schools, liaise with the Designated Safeguarding Lead, and provide information and reports to the Governing Body.
- The federation 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. Early Help may be offered directly through our schools’ early help provision or via referral to an external support agency. Safeguarding arrangements take into account the procedures and practice of the local authority and the Worcestershire Safeguarding Children Partnership (WCSP).
- GDPR - Our governing body are aware that among other obligations, the [Data Protection Act 2018](#) and the GDPR place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information we hold safe and secure in . [Data protection: toolkit for schools - GOV.UK \(www.gov.uk\)](#)
- The federation complies with all legislative safeguarding duties, including the duty to report suspected or known cases of FGM and the duty to prevent young people from being drawn into terrorism. The Head and DSLs assess the level of risk within the schools and put actions in place to reduce that risk.

In our schools we will :

- 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 schools whom they can approach if they are worried or are in difficulty.
- Include in the curriculum activities and opportunities (specifically through PHSE/ ICT/RSE, which equip children with the skills they need to stay safe from abuse (including online) and to know where to get help.
- Ensure every effort is made to establish effective working relationships with parents/carers and colleagues from other agencies.
- Operate safer recruitment procedures and make sure that all appropriate checks are carried out on 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 “s128” for Governors in maintained schools (Since September 2018)
- As Education Safeguarding Practitioners we will liaise with the three safeguarding partners in line with Working Together 2018.
- Criminal history and suitability to work with children information is only requested from applicants who have been shortlisted.
- As part of the shortlisting process we consider conducting an online search as part of our due diligence on the shortlisted candidates. This may help identify any incidents or issues that have happened, and are publicly available online, which the federation might want to explore with the applicant at interview.
- We identify crime statistics in our local area <https://www.crimestatistics.co.uk>

## Section 9 – The Designated Safeguarding Lead

The federation ensures an appropriate senior member of staff from our schools is on our leadership team in the role of the designated safeguarding lead (DSL). Our designated safeguarding lead has lead responsibility for safeguarding and child protection (including online safety). This DSL role is explicit in their job description

We also have deputy designated safeguarding leads who have been trained the same as our DSL. Whilst the activities of the designated safeguarding lead can be delegated to appropriately trained deputies, the ultimate lead responsibility for safeguarding and child protection remains with our designated safeguarding lead. This responsibility will not be delegated.

The designated safeguarding lead and any deputies will liaise with the safeguarding partners, and work with other agencies in line with [Working Together to safeguard children](#) .

During term time, our designated safeguarding lead and/or a deputy will always be available (during school hours) for staff in the school to discuss any safeguarding concerns. Where appropriate our designated safeguarding lead will arrange adequate and appropriate cover arrangements for any out of hours/out of term activities.

Our designated safeguarding lead and deputies have undertaken training to provide them with the knowledge and skills required to carry out the role.

In addition to our formal training as set out above, their knowledge and skills will be updated (for example via e-bulletins, meeting other designated safeguarding leads, or taking time to read and digest safeguarding developments), at regular intervals, and at least annually, to keep up with any developments relevant to their role.

## Section 10 – Multi-agency Working

In our federation we have a pivotal role to play in multi-agency safeguarding arrangements. Our Governing body ensures that we contribute to multi-agency working in line with statutory guidance *Working Together to Safeguard Children*

In our school our leaders and governing body understand our local safeguarding arrangements and work with partners from Worcestershire Childrens safeguarding partnership (WSCP) to safeguard and promote the welfare of local children, including identifying and responding to their needs. The Worcestershire children first WCF Head teacher safeguarding steering group (who have representatives from all phases of education) are part of our WSCP and make all schools aware of and ensure they follow the local arrangements and assessment policies and procedures. We are also prepared to supply information as requested by the safeguarding partners.

[Worcestershire Children First \(worcestershirechildrenfirst.org.uk\)](http://worcestershirechildrenfirst.org.uk)

Our federation works with WCF social care, the police, health services and other services to promote the welfare of children and protect them from harm. This includes providing a coordinated offer of early help when additional needs of children are identified and contributing to inter-agency plans to provide additional support to children subject to child protection plans.

We allow access for children's social care from the host local authority (according to where the child lives) and, where appropriate, from a placing local authority, for that authority to conduct, or to consider whether to conduct, a section 17 or a section 47 assessment.

## Section 11 – What School Staff Need to Know

**All** staff are aware of systems within our federation which support safeguarding, and these are explained to them as part of staff induction. This includes the:

- child protection policy.
- behaviour policy (which should include measures to prevent bullying, including cyberbullying),
- staff handbook and code of conduct.
- safeguarding response to children who go missing from education; and
- role of the designated safeguarding lead (including the identity of the designated safeguarding lead and deputies).
- Copies of policies and a copy of Part one (or Annex A in Keeping Children Safe if appropriate) of this document is provided to staff at induction.

- **All our** staff will receive appropriate safeguarding and child protection training (including online safety) at induction. The training is regularly updated. In addition, all staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.
- **All our** staff are aware of their local early help process and understand their role in it.
- **All our** staff are aware of the process for making referrals to children's social care and for statutory assessments under the Children Act 1989, especially section 17(children in need) and section 47 (a child suffering, or likely to suffer, significant harm) that may follow a referral, along with the role they might be expected to play in such assessments.
- **All our staff** are 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.
- **All our** staff know what to do if a child tells them he/she is being abused, exploited, or neglected. Staff know how to manage the requirement to maintain an appropriate level of confidentiality. This means only involving those who need to be involved, such as the designated safeguarding lead (or a deputy) and children's social care. Staff never promise a child that they will not tell anyone about a report of any form of abuse, as this may ultimately not be in the best interests of the child.
- **All our** staff are able to reassure victims that they are being taken seriously and that they will be supported and kept safe.

**All our** staff receive appropriate safeguarding and child protection training (including online safety) at induction. The training is regularly updated. In addition, all our staff receive safeguarding and child protection (including online safety) updates (for example, via email, e-bulletins and staff meetings), as required, and at least annually, to provide them with relevant skills and knowledge to safeguard children effectively.

### **Abuse and neglect**

All our staff are aware of indicators of abuse and neglect. As part of our safeguarding training, staff know what signs to look for to identify early signs of abuse and neglect and specific safeguarding issues such as child criminal exploitation and child sexual exploitation, to safeguard children who may be in need of help or protection. If staff are unsure, they always speak to the designated safeguarding lead, or deputy.

All our staff are aware that technology is a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face. In many cases abuse will take place concurrently via online channels and in daily life.

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

All our staff have an awareness of safeguarding issues that can put children at risk of harm. Behaviours linked to issues such as drug taking and or alcohol misuse, deliberately missing education and sharing nudes and semi-nudes' images and or videos can be signs that children are at risk.

**Our staff are also aware of the following safeguarding issues:**

## Section 11.1 – Online Safety

### Online safety

It is essential that children are safeguarded from potentially harmful and inappropriate online material. An effective whole school approach to online safety empowers a school to protect and educate pupils, students, and staff in their use of technology and establishes mechanisms to identify, intervene in, and escalate any concerns where appropriate. All staff are aware that abuse can take place solely online.

The breadth of issues classified within online safety is considerable and ever evolving, but can be categorised into four areas of risk:

**content:** being exposed to illegal, inappropriate, or harmful content, for example: pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation, and extremism.

**contact:** being subjected to harmful online interaction with other users; for example: peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.

**conduct:** online behaviour that increases the likelihood of, or causes, harm; for example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography, sharing other explicit images and online bullying, and

**commerce:** - risks such as online gambling, inappropriate advertising, phishing and or financial scams. If you feel your pupils, students or staff are at risk, please report it to the Anti-Phishing Working Group [APWG | Unifying The Global Response To Cybercrime](#)

Our Governing body ensures that online safety is a running and interrelated theme whilst devising and implementing our whole school approach to safeguarding and related policies and procedures. This includes considering how online safety is reflected as required in all relevant policies and considering online safety whilst planning the curriculum, any teacher training, the role and responsibilities of the designated safeguarding lead (and deputies) and any parental engagement.

## Section 11.2 – Online Safety Policy

At the Pebworth First and Blackminster Middle Schools Federation we have a clear policy on the use of mobile and smart technology. We understand the fact many children have unlimited and unrestricted access to the internet via mobile phone networks (i.e. 3G, 4G and 5G). This access means some children, whilst at school, sexually harass, bully, and control others via their mobile and smart technology, share indecent images consensually and non-consensually (often via large chat groups) and view and share pornography and other harmful content. We have carefully considered how this is managed on their premises and reflect this in their mobile and smart technology policy and their child protection policy.

## Section 11.3 – Remote Education

To support our schools to help keep pupils, students and staff safe whilst learning remotely, we are in regular contact with parents and carers. These communications are be used to reinforce the importance of children being safe online and parents and carers are likely to find it helpful to understand what systems our schools use to filter and monitor online use. It will be especially important for parents and carers to be aware of what their children are being asked to do online, including the sites they will be asked to access and be clear who from the schools (if anyone) their child is going to be interacting with online.

The NSPCC also provide helpful advice - <https://learning.nspcc.org.uk/news/covid/undertaking-remote-teaching-safely>

## Section 11.4 – Filters and Monitoring

Our governing body are reasonable and need to ensure the limit of children’s exposure to the above risks from the schools’ IT system. Our governing body ensures our schools have appropriate filters and monitoring systems in place and regularly review their effectiveness. The leadership team and relevant staff have an awareness and understanding of the provisions in place and manage them effectively and know how to escalate concerns when identified. We also consider the age range of our children, the number of children, how often they access the IT system and the proportionality of costs verses safeguarding risks.

## Section 11.5 – Opportunities to Teach Safeguarding

In our Federation, children are taught about safeguarding, including online safety, as part of providing a broad and balanced curriculum, through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools). The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education \(RSE\)and health education.](#)

Furthermore, we recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.

## Section 12- Safeguarding and the Curriculum

Children are taught about safeguarding in our schools. The following areas are among those addressed in **PSHE/RSE** and in the wider curriculum.

- Bullying/Cyber Bullying
- Drugs, Alcohol and Substance Abuse
- Online Safety / Mobile technologies
- Stranger Danger
- Fire and Water Safety
- Child on Child abuse
- Sexual Violence and Sexual Harassment
- Road Safety
- Domestic Abuse
- Healthy Relationships / Consent
- So called Honour Based Violence issues (HBV) e.g. Forced Marriage, Female Genital Mutilation (FGM)
- Child Exploitation of Children
- <https://www.gov.uk/government/publications/promoting-fundamental-british-values-through-smisc>
- Extremism and Radicalisation (in line with the DfE advice Promoting Fundamental British Values as part of SMSC (spiritual, moral, social and cultural education) in Schools (2014)<sup>1</sup>.

## Section 13 – Information Sharing

We recognise the importance of information sharing between practitioners and local agencies. We have ensured arrangements are in place that set out clearly the processes and principles for sharing information within our schools and with WCF children’s social care, the safeguarding partners, other organisations, agencies, and practitioners as required.

In our schools our staff are proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children, whether this is when problems are first emerging, or where a child is already known to the local authority children's social care.

Our governing body are aware that among other obligations, the Data Protection Act 2018, and the UK General Data Protection Regulation (UK GDPR) place duties on organisations and individuals to process personal information fairly and lawfully and to keep the information they hold safe and secure.

This includes:

- We are confident of the processing conditions which allow us to store and share information for safeguarding purposes, including information, which is sensitive and personal, and is 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. 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 UK GDPR. Where in doubt we will seek independent legal advice.*

The Data Protection Act 2018 and UK GDPR do not prevent the sharing of information for the purposes of keeping children safe. Fears about sharing information must not be allowed to stand in the way of the need to safeguard and promote the welfare and protect the safety of children.

When children transfer from our schools the safeguarding records are also transferred, either by CPOMS (the system we use) or paper copies if other schools do not use CPOMS. Safeguarding records are transferred separately from other records and best practice is to pass these directly to a Designated Safeguarding Lead in the receiving education setting, with any necessary discussion or explanation and to obtain a signed and dated record of the transfer. In the event of a child moving out of area and a physical handover not being possible then the most secure method is found to send the confidential records to a named Designated Safeguarding Lead. Files requested by other agencies e.g. Police, will be copied.

## Section 14 – Records, Monitoring and Transfer

All staff are clear about the need to record and report concerns about a child or children within the school. Staff know to include the child's words as far as possible and that all statements should be timed, dated and signed. The Designated Safeguarding Lead is responsible for such records and for deciding at what point these records should be passed over to other agencies.

Where children leave our schools, the designated safeguarding lead will ensure their child protection file is transferred to the new school or college as soon as possible, and **within 5 days** for an in-year transfer or within the **first 5 days** of the start of a new term to allow the new school or college to have support in place for when the child arrives. The designated safeguarding lead will ensure secure transit, and confirmation of receipt should be obtained, this will be transferred separately from the main pupil file. The receiving schools and colleges should ensure key staff such as designated safeguarding leads and special educational needs co-ordinators (SENCOs) or the named persons with oversight for special educational needs and disability (SEND) in a college, are aware as required.

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. Designated Safeguarding Leads and the Head Teacher.

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 (eg child who repeatedly goes missing) and ensuring these are acted upon. Each stand - alone file should have a chronology of significant events.

A record of any allegations (proven) made against staff is kept in a confidential file by the Executive Headteacher.

All concerns, discussions and decisions made, and the reasons for those decisions, are recorded in detail on CPOMS. Information is kept confidential and stored securely. Any paper files are stored in a locked filing cabinet in the Hub office.

Records 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).

## Section 15 – Procedures for Managing Concerns

Pebworth First and Blackminster Middle Schools Federation adheres to child protection procedures that have been agreed locally through the Safeguarding Worcestershire [www.safeguardingworcestershire.org.uk](http://www.safeguardingworcestershire.org.uk)

Where we identify children and families in need of support, we carry out our responsibilities in accordance with the [West Mercia Consortium inter-agency procedures](#) and the [WSCP Levels of Need Guidance](#).

The Designated Safeguarding Lead (DSL) is first point of contact for concerns and queries regarding any safeguarding concern in our schools. Any member of staff or visitor to either of the schools who receives a disclosure of abuse or suspects that a child is at risk of harm must report it immediately to the DSL or, if unavailable, to the deputy designated lead. In the absence of either of the above, the matter should be brought to the attention of the most senior member of staff.

All concerns about a child or young person are to be reported without delay and recorded in writing using the agreed template.

The DSL will consider what action to take and have appropriate discussions with parents/carers prior to referral to children's social care or another agency unless, to do so would place the child at risk of harm or compromise an investigation

All referrals will be made in line with [local procedures](#) as detailed on the [Worcester Children First Website](#).

If, at any point, there is a risk of immediate serious harm to a child the staff member is expected to call 999 and make referral is made to Children's Services immediately. Anybody can make a referral. If the child's situation does not appear to be improving the staff member with concerns should press for re-consideration by raising concerns again with the DSL and/or the Head teacher. Concerns should always lead to help for the child at some point.

Staff follow the reporting procedures outlined in this policy in the first instance. However, they may also share information directly with Children's Services, or the police if:



- the situation is an emergency and the designated senior person, their deputy and the Head teacher are all unavailable.
- they are convinced that a direct report is the only way to ensure the pupil's safety.

Any member of staff who does not feel that concerns about a child have been responded to appropriately and in accordance with the procedures outlined in this policy should raise their concerns with the Head teacher or the Chair of Governors. If any member of staff does not feel the situation has been addressed appropriately at this point, they should contact Children's Services directly with their concerns.

## Section 16 – Child Sexual Exploitation (CSE) and Child Criminal Exploitation (CCE)

Both CSE and CCE are forms of abuse that occur where an individual or group takes advantage of an imbalance in power to coerce, manipulate or deceive a child into taking part in sexual or criminal activity, in exchange for something the victim needs or wants, and/or for the financial advantage or increased status of the perpetrator or facilitator and/or through violence or the threat of violence. 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.

### Child Criminal Exploitation (CCE)

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

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

### Child Sexual Exploitation (CSE)

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. It may include 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 e.g. 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 e.g. they believe they are in a genuine romantic relationship.

## Section 17 – Child Abduction and Community Safety Incidents

Child abduction is the unauthorised removal or retention of a minor from a parent or anyone with legal responsibility for the child. Child abduction can be committed by parents or other family members; by

people known but not related to the victim (such as neighbours, friends and acquaintances); and by strangers.

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

As children get older and are granted more independence (for example, as they start walking to school on their own) it is important we provide practical advice on how to keep themselves safe. As a Federation we provide outdoor-safety lessons run by our teachers or by local police staff. Lessons focus on building children's confidence and abilities rather than simply warning them about all strangers. Further information is available at: [www.actionagainstabduction.org](http://www.actionagainstabduction.org) and [www.clevernevergoes.org](http://www.clevernevergoes.org).

## Section 18 – Children Missing from Education

Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation. It is important the schools' response to children missing from education supports identifying such abuse and also helps prevent the risk of them going missing 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 on a child in need or child protection plan, or as a looked after child), where going missing from education may increase known safeguarding risks within the family or in the community.

Children at risk of missing in education are children of compulsory school age who are:

- not on a school roll
- not being educated other than at school
- identified as having been out of any educational provision for a substantial period of time (4 weeks)

Children go missing from education for a number of reasons including:

- they don't start school at the appropriate time and so they do not enter the educational system
- they are removed by their parents
- behaviour and/or attendance difficulties
- they cease to attend, due to exclusion, illness or bullying
- they fail to find a suitable school place after moving to a new area
- the family move home regularly
- problems at home

The law requires all children between the ages of 5 and 16 to be in full time education.

The federation's duties regarding children missing education, including information schools **must** provide to the local authority when removing a child from the school roll at standard and non-standard transition points can be found in the department's statutory guidance:

[Worcestershire children first children missing from education guidance.](#)

[Statutory guidance children missing in education](#)

Further information for colleges providing education for a child of compulsory school age can be found in [Full-time-Enrolment of 14 to 16-year olds in Further Education and Sixth Form Colleges.](#)

General information and advice for schools and colleges can be found in the [Government's Missing Children and Adults Strategy.](#)

### **Elective Home Educated**

Many home educated children have an overwhelmingly positive learning experience. In the federation we expect the parents' decision to home educate to be made with their child's best education at the heart of the decision. However, we know 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, we must inform our Worcestershire Children First all deletions from our admission register when a child is taken off roll.

Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, we will work together to coordinate a meeting with parents/carers where possible.

### **Section 19 -Children with Family Members in Prison**

Approximately 200,000 children in England and Wales have a parent sent to prison each year. These children are at risk of poor outcomes including poverty, stigma, isolation, and poor mental health. [NICCO](#) provides information designed to support professionals working with offenders and their children, to help mitigate negative consequences for those children.

### **Section 20 – County Lines**

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

Exploitation is an integral part of the county lines offending model with children and vulnerable adults exploited to move [and store] drugs and money. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools (mainstream and special), further and higher educational institutions, pupil referral units, children's homes and care homes. Children are often recruited to move drugs and money between locations and are known to be exposed to techniques such as 'plugging', where drugs are concealed internally to avoid detection. Children can easily become trapped by this type of exploitation as county lines gangs create drug debts and can threaten serious violence and kidnap towards victims (and their families) if they attempt to leave the county lines network.

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

If we identify that a child may be at risk of exploitation the designate safeguarding lead will work with and support and consider completion of a GET SAFE risk assessment which will be referred to Worcestershire children first get safe team for further assessment and support. The designated safeguarding lead will also consider referral to Worcestershire children first family front door as part of our schools and local safeguarding procedures. More information can be found: [Get Safe - keeping children and young people safe from criminal exploitation](#)

[County Lines Guidance](#)

### **Section 21 – Domestic Abuse**

[Ending Domestic abuse Save Lives](#)

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are, or have been, intimate partners or family members regardless of sex or sexuality.

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 detrimental and long-term impacts on their health, well-being, development, and ability to learn.

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

Where we identify a victim of domestic abuse being high risk, we will consider a referral to MARAC (multi agency risk assessment conference). The purpose of MARAC is to share information and establish a multi-agency action plan to support the victim and to make links with other public protection procedures, particularly safeguarding children, vulnerable adults and the management of offenders. We will continue to provide help and support in order to safeguard children. This will usually be led by the designated safeguarding lead. MARAC does not replace a referral to children social care.

[Worcestershire children first Domestic abuse guidance](#)

## Section 22 – Operation Encompass

DSLs in the Federation are receiving Operation Encompass Notifications. The purpose of Operation Encompass is to highlight that a Domestic Abuse Incident has taken place and the police have been called. We will be keeping an eye on changed behaviour and logging anything out of the ordinary. Operation Encompass is working well in Worcestershire Schools and Worcestershire Children First have successfully notified over 8000 incidents since 2019. All this is great news for children and their families. It helps police and schools work together to provide emotional and practical help to children. The system ensures that when 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 Worcestershire Children First, who then inform the School (usually the Designated Safeguarding Lead) before the child or children arrive at school the following day. This is so we have up to date relevant information about the child's circumstances and can enable support to be given to the child according to their needs.

## Section 23 – Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The designated safeguarding lead and deputies are aware of contact details and referral routes into the Local Housing Authority so they can raise/progress concerns at the earliest opportunity. 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. Whilst referrals and/or discussion with the Local Housing Authority should be progressed as appropriate, and in accordance with local procedures, this does not, and should not, replace a referral into children's social care where a child has been harmed or is at risk of harm. The Homelessness Reduction Act 2017 places a new legal duty on English councils so that everyone who is homeless or at risk of homelessness will have access to meaningful help including an

assessment of their needs and circumstances, the development of a personalised housing plan, and work to help them retain their accommodation or find a new place to live. The following factsheets usefully summarise the new duties: [Homeless Reduction Act Factsheets](#). The new duties shift focus to early intervention and encourage those at risk to seek support as soon as possible, before they are facing a homelessness crisis.

## Section 24 – Honour-Based Abuse (including Female Genital Mutilation and Forced Marriage)

Honour-Based’ abuse (HBA) encompasses incidents or crimes which have been committed to protect or defend the honour of the family and/or the community, including female genital mutilation (FGM), forced marriage, and practices such as breast ironing. Abuse committed in the context of preserving “honour” often involves a wider network of family or community pressure and can include multiple perpetrators. We are aware of this dynamic and additional risk factors when deciding what form of safeguarding action to take. All forms of HBA are abuse (regardless of the motivation) and are 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.

[The right to choose: government guidance on forced marriage - GOV.UK \(www.gov.uk\)](#)

### 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.

### 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 may 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. Information on when and how to make a report can be found at: [Mandatory reporting of female genital mutilation procedural information](#)

Teachers must and will personally report to the police cases where they discover that an act of FGM appears to have been carried out. Unless a teacher has good reason not to, they will still consider and discuss any such case with the school’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. The following is a useful summary of the FGM mandatory reporting duty: [FGM Fact Sheet](#).

## Section 25 – 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. Federation staff understand we could potentially 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. Staff can contact the Forced Marriage Unit if they need advice or information: Contact: 020 7008 0151 or email [fmufco.gov.uk](mailto:fmufco.gov.uk).

## Section 26 – Preventing Radicalisation

The Federation knows that children are vulnerable to extremist ideology and radicalisation. As part of our whole safeguarding approach we include and consider the following;

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

As defined in the Government's Counter Extremism Strategy

<https://www.gov.uk/government/publications/counter-extremism-strategy>.

As defined in the Revised Prevent Duty Guidance for England and Wales

<https://www.gov.uk/government/publications/prevent-duty-guidance/revised-prevent-duty-guidance-for-england-and-wales>.

As defined in the Terrorism Act 2000 (TACT 2000)

<http://www.legislation.gov.uk/ukpga/2000/11/contents>

There is no single way of identifying whether a child is likely to be susceptible to an extremist ideology. Background factors combined with specific influences such as family and friends may contribute to a child's vulnerability. Similarly, radicalisation can occur through many different methods (such as social media or the internet) and settings (such as within the home).

However, it is possible to protect vulnerable people from extremist ideology and intervene to prevent those at risk of radicalisation being radicalised. As with other safeguarding risks, staff are alert to changes in children's behaviour, which could indicate that they may need help or protection. Staff use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the designated safeguarding lead (or deputy) making a Prevent referral.

The designated safeguarding lead (and deputies) are aware of local procedures for making a Prevent referral.

## Section 27 – The Prevent Duty

As all schools, we are subject to a duty under section 26 of the Counter-Terrorism and Security Act 2015 (the CTSA 2015), in the exercise of our functions, to have “due regard to the need to prevent people from being drawn into terrorism”. This duty is known as the Prevent duty.

The Prevent duty is part of our Federation wider safeguarding obligations. Designated safeguarding leads and other senior leaders are familiar with the revised [Prevent duty guidance: for England and Wales](#),

There is additional guidance: [Prevent duty guidance: for further education institutions](#) in England and Wales that applies to colleges.

## Section 28 – Channel

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

Guidance on Channel is available at: [Channel guidance](#).

The Home Office has developed three e-learning modules:

- [Prevent awareness e-learning](#) offers an introduction to the Prevent duty.
- [Prevent referrals e-learning](#) supports staff to make Prevent referrals that are robust, informed and with good intention.
- [Channel awareness e-learning](#) is aimed at staff who may be asked to contribute to or sit on a multi-agency Channel panel.

[Educate Against Hate](#) is a government website designed to support school teachers and leaders to help them safeguard their students from radicalisation and extremism. The platform provides free information and resources to help school staff identify and address the risks, as well as build resilience to radicalisation.

For advice specific to further education, the Education and Training Foundation (ETF) hosts the [Prevent for FE and Training](#). This hosts a range of free, sector specific resources to support further education settings comply with the Prevent duty. This includes the Prevent Awareness e-learning, which offers an introduction to the duty, and the Prevent Referral e-learning, which is designed to support staff to make robust, informed and proportionate referrals.

The ETF Online Learning environment provides online training modules for practitioners, leaders and managers, support staff and governors/Board members outlining their roles and responsibilities under the duty.



## Section 29 – Relationships and Sex Education

This may include covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which was made compulsory from September 2020. The statutory guidance can be found here: Statutory guidance: [relationships and sex education \(RSE\) and health education](#).

The following resources may be helpful:

- [Child Exploitation and Online Protection command](#): is a law enforcement agency which aims to keep children and young people safe from sexual exploitation and abuse. Online sexual abuse can be reported on their website and a report made to one of its Child Protection Advisors
- The NSPCC provides a helpline for professionals at 0808 800 5000 and [help@nspcc.org.uk](mailto:help@nspcc.org.uk) The helpline provides expert advice and support for school and college staff and will be especially useful for the designated safeguarding lead (and their deputies)
- Support from specialist sexual violence sector organisations such as [Rape Crisis](#) or [The Survivors Trust](#)
- The Anti-Bullying Alliance has developed [guidance for schools about Sexual and sexist bullying](#). Online: Schools and colleges should recognise that sexual violence and sexual harassment occurring online (either in isolation or in connection with face-to-face incidents) can introduce a number of complex factors. Amongst other things, this can include widespread abuse or harm across a number of social media platforms that leads to repeat victimisation. Online concerns can be especially complicated and support is available from:
- The UK Safer Internet Centre provides an [online safety helpline](#) for professionals at 0344 381 4772. The helpline provides expert advice and support for school and college staff with regard to online safety issues
- [Internet Watch Foundation](#): If the incident/report involves sexual images or videos that have been made and circulated online, the victim can be supported to get the images removed by the Internet Watch Foundation (IWF)
- [Childline/IWF Report Remove](#) is a free tool that allows children to report nude or sexual images and/or videos of themselves that they think might have been shared online
- [UKCIS Sharing nudes and semi-nudes advice](#): Advice for education settings working with children and young people on responding to reports of children sharing non-consensual nude and semi-nude images and/or videos (also known as sexting and youth produced sexual imagery).
- [Thinkuknow](#) from NCA-CEOP provides support for the children's workforce, parents and carers on staying safe online
- [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.
- Public Health England: Rise Above Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which will be compulsory from September 2021. Schools have flexibility to decide how they discharge their duties effectively within the first year of compulsory teaching and are encouraged to take a phased approach (if needed) when introducing these subjects.



### **Children who are lesbian, gay, bi, or trans (LGBT)**

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that at Pebworth and Blackminster we endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff.

LGBT inclusion is part of the statutory Relationships Education, Relationship and Sex Education and Health Education curriculum and there is a range of support available to help us to counter homophobic, biphobic and transphobic bullying and abuse.

### **Section 30 – Child on Child Abuse**

All our staff are aware that children can abuse other children (often referred to as peer on peer abuse) and that it can happen both inside and outside of school and also online. It is important that all staff recognise the indicators and signs of child on child abuse and know how to identify it and respond to reports.

All our staff understand, that even if there are no reports in our 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 child on child abuse, they should speak to their designated safeguarding lead (or deputy).

All our staff understand the importance of challenging inappropriate behaviours between peers, many of which are listed below, that are actually abusive in nature. Downplaying certain behaviours, for example dismissing sexual harassment as “just banter”, “just having a laugh”, “part of growing up” or “boy 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.

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

- 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; and
- 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 our staff are clear as to the federation's policy and procedures for dealing with child on child abuse and the important role they have to play in preventing it and responding where they believe a child may be at risk from it.

### **Child on child sexual violence and sexual harassment**

Sexual violence and sexual harassment can occur between two children of any age and sex. It can also occur through a group of children sexually assaulting or sexually harassing a single child or group of children. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and face to face (both physically and verbally) and are never acceptable.

Pebworth First and Blackminster Middle Schools Federation will respond to reports of child on child sexual violence and sexual harassment.

For detailed information on what sexual violence and sexual harassment constitutes, important context to be aware of, related legal responsibilities for schools and colleges, advice on a whole school or college approach to preventing child on child sexual violence and sexual harassment and more detailed advice on responding to reports see:

[Sexual Violence and Sexual Harassment Between Children in Schools and Colleges.](#)

### **Sexual harassment**

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

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

- 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 (schools and colleges should be considering when any of this crosses a line into sexual violence - it is important to talk to and consider the experience of the victim) and displaying pictures, photos or drawings of a sexual nature; and
- online sexual harassment. This may be standalone, or part of a wider pattern of sexual harassment and/or sexual violence.

It may include non-consensual sharing of sexual images and videos.

- sexualised online bullying.
- unwanted sexual comments and messages, including, on social media.
- sexual exploitation; coercion and threats; and upskirting.

### **Upskirting**

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

The initial response to a report from a child is important. It is essential that all victims are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given

the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

### Section 31 – Children with Additional Vulnerabilities

There are many children who have additional needs or whose living arrangements may mean that they are more vulnerable to harm, for example children with special educational needs, disabled children, children in public care or privately fostered children. It is essential that the schools know who shares parental responsibility for children and has effective relationships with partner agencies in relation to these children (for example, Virtual School for Children in Care).

We will ensure that staff have sufficient knowledge and guidance so that they are aware of the additional challenges faced by these children and the impact of their additional vulnerabilities. These can include: assumptions that indicators of possible abuse such as behaviour, mood and injury relate to a child's disability without further exploration; no single point of contact for the school as a child has a number of care-givers and involved professionals; assumptions that state approved care-givers are providing safe care for the child; communication needs of a child which can lead to over reliance on parental accounts and interpretations.

### Section 32 – Safeguarding Concerns and Allegations made about Staff, including Supply Teachers, Volunteers and Contractors

The Pebworth First and Blackminster Middle Schools Federation has processes and procedures in place to manage any safeguarding concerns about staff members (including supply staff and volunteers).

If staff have safeguarding concerns or an allegation is made about another member of staff (including supply staff and volunteers) posing a risk of harm to children, then:

- this should be referred to the executive headteacher;
- where there are concerns/allegations about the executive headteacher, this should be referred to the chair of governors

The federation will comply with guidance about conduct and safe practice, including safe use of mobile phones. Pupils' allegations or concerns about staff conduct will be taken seriously and followed up in a transparent and timely way.

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

- behaved 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.
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

Allegations against a teacher who is no longer teaching we may refer to the police. Historical allegations of abuse should also be referred to the police.

We have a duty of care to their employees. We will ensure we provide effective support for anyone facing an allegation and provide them with a named contact if they are suspended. Where the federation is not the employer of an individual, they still have responsibility to ensure allegations are dealt with appropriately and that they liaise with relevant parties (this includes supply teachers and volunteers, see paragraphs on supply teachers below). It is essential that any allegation of abuse made against a teacher or other member of staff or volunteer in a school or college is dealt with very quickly, in a fair and consistent

way that provides effective protection for the child and, at the same time supports the person who is the subject of the allegation

### **Concerns and or allegations that do not meet the harm threshold**

Our governing body has policies and processes to deal with any concerns (including allegations) which do not meet the harm threshold, referred to as 'low-level' concerns.

#### **Low Level concerns**

We ensure that our federation promotes an open and transparent culture in which all concerns about all adults working in or on behalf of our schools (including supply teachers, volunteers and contractors) are dealt with promptly and appropriately.

Creating a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately, is critical. If implemented correctly, this should:

- encourage an open and transparent culture
- enable schools and colleges to identify inappropriate, problematic or concerning behaviour early
- minimise the risk of abuse and ensure that adults working in or on behalf of the school or college are clear about professional boundaries and act within these boundaries, and in accordance with the ethos and values of the institution.

#### **What is a low-level concern?**

The term 'low-level' concern does not mean that it is insignificant. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the school or college may have acted in a way that:

- is inconsistent with the staff code of conduct, including inappropriate conduct outside of work and does not meet the harm threshold or is otherwise not serious enough to consider a referral to the LADO. Examples of such behaviour could include, but are not limited to:
- being over friendly with children
- having favourites
- taking photographs of children on their mobile phone, contrary to school policy
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door, or
- humiliating pupils.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

Low-level concerns may arise in several ways and from a number of sources. For example: suspicion; complaint; or disclosure made by a child, parent or other adult within or outside of the organisation; or as a result of vetting checks undertaken.

It is crucial that all low-level concerns are shared responsibly with the right person, and recorded and dealt with appropriately. Ensuring they are dealt with effectively should also protect those working in or on behalf of schools and colleges from becoming the subject of potential false low-level concerns or misunderstandings.

## Section 33 – Managing Professional Disagreements

On occasions there will be disagreements between professionals as to how concerns are handled, and these can impact on effective working relationships. The federation will support staff to promote positive partnerships within school and with other agencies and will ensure that staff are aware of how to escalate concerns and disagreements if appropriate and use the WSCP escalation procedures if necessary.

According to Chapter one of Working Together to Safeguard Children, examples of poor practice include:

- failing to act on and refer the early signs of abuse and neglect.
- poor record keeping.
- failing to listen to the views of the child.
- failing to re-assess concerns when situations do not improve.
- not sharing information with the right people within and between agencies.
- sharing information too slowly; and
- a lack of challenge to those who appear not to be taking action.

### [Escalation Policy: Resolution of Professional Disagreements](#)

## Section 34 – The Use of ‘Reasonable Force’ in Schools

There are circumstances when it is appropriate for federation staff use reasonable force to safeguard children and young people. The term ‘reasonable force’ covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. ‘Reasonable’ in these circumstances means ‘using no more force than is needed’. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil’s path, or active physical contact such as leading a pupil by the arm out of the classroom.

- Departmental advice for schools is available [Use of reasonable force in schools guidance](#)
- Advice for colleges is available on the AOC website; [Association of Colleges \(aoc.co.uk\)](#)

## Section 35 – Private Fostering – LA notification when identified

Private fostering occurs when a child under the age of 16 (under 18, if disabled) is provided with care and accommodation by a person who is not a parent, person with parental responsibility for them or a relative in their own home. A child is not privately fostered if the person caring for and accommodating them has done so for less than 28 days and does not intend to do so for longer. Such arrangements may come to the attention of our staff through the normal course of their interaction, and promotion of learning activities, with children.

We will then notify the local authority to allow the local authority to check the arrangement is suitable and safe for the child.

See DfE statutory guidance [Children Act 1989](#) Private fostering for comprehensive guidance on private fostering.

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child’s parents. It applies to children under the age of 16 or aged under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children’s home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

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

By law, a parent, private foster carer or other persons involved in making a private fostering arrangement must notify Children's Services as soon as possible. If we become aware of a privately fostering arrangement, we will check that Children's Services have been informed.

## Section 36 – Children Looked After and Children Previously Looked After

The most common reason for children becoming looked after is because of abuse and/or neglect. Our governing body ensures that staff have the skills, knowledge and understanding to keep looked after children safe.

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

## Section 37 – Statutory Children's Social Care Assessment and Services

Concerns about a child's welfare should be referred to local authority children's social care. Where a child is suffering, or is likely to suffer from harm, we will make a referral to children's social care and if appropriate the police will be made immediately. Referrals will follow the local referral process. We provide as much information as possible as part of the referral process. This will allow any assessment to consider all the available evidence and enable a contextual approach to address such harm. Additional information is available here: [Contextualised Safeguarding](#)

## Section 38 – Mental Health

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

Pebworth and Blackminster staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one, although we are very clear that only appropriately trained professionals should attempt to make a diagnosis of a mental health problem.

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education.

We have access to a range of advice to help them identify children in need of extra mental health support, this includes working with external agencies. More information can be found in the [mental health and behaviour in schools guidance](#), colleges may also wish to follow this guidance as best practice. Public Health England has produced a range of resources to support secondary school teachers to promote positive health, wellbeing, and resilience among children. See Rise Above for links to all materials and lesson plans.

If we have a mental health concern about a child that is also a safeguarding concern, immediate action will be taken, following our child protection policy and speaking to the designated safeguarding lead or a deputy. We will seek advice and guidance from [Preventing and Tackling Bullying, and Mental Health and Behaviour in Schools](#)

## Section 39 – Children Potentially at Greater Risk of Harm

### **Children who need a social worker (Child in Need and Child Protection Plans)**

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

Local authorities should share the fact a child has a social worker, and the designated safeguarding lead will hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This will be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools to safeguard and promote the welfare of children.

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

Findings from the Children in Need review, '[Improving the educational outcomes of Children in Need of help and protection](#)' contains further information; the conclusion of the review, '[Help, protection, education](#)' sets out action Government is taking to support this.

## Section 40 – Use of School Premises for Non-School Activities

If we hire out our school facilities/premises to organisations or individuals (for example to community groups, sports associations and service providers to run community or extra-curricular activities) we will ensure that appropriate arrangements are in place to keep children safe.

When services or activities are provided by the federation under the direct supervision or management of our schools the arrangements for child protection will apply.

Where an external body is providing community or extra-curricular activities, we seek assurance that appropriate safeguarding and child protection policies and procedures in place (including inspecting these as needed). We will ensure safeguarding requirements are included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises; and that failure to comply with this would lead to termination of the agreement.

## Section 41 – Alternative Provision

We are aware of the additional risk of harm that pupils in alternative provision may be vulnerable to.

The DfE has issued two pieces of statutory guidance to which we have regard when we commission of Alternative Provision:

- [Alternative provision](#) - DfE Statutory Guidance
- [Education for children with health needs who cannot attend school](#)

## Other Relevant Policies

The Governing Body's statutory responsibility for safeguarding the welfare of children goes beyond compliance with child protection procedures. The safeguarding duty is relevant for the discharge of all functions and activities. This policy needs to be considered in conjunction with the following policies:

- Behaviour Management
- Child on Child abuse
- Staff handbook and Code of Conduct
- Racist Incidents
- Anti-Bullying (including Cyber Bullying)
- Physical Interventions/Restraint (DfE Guidance "Use of Reasonable Force" and "Screening, Searching and Confiscation")
- Special Educational Needs
- First Aid and the Administration of Medicines
- Health and Safety
- Healthy Relationships
- Complaints Procedure
- Equal Opportunities
- Toileting/Intimate Care
- Online Safety
- Supporting Pupils/Students with Medical Conditions
- Whistleblowing



## ANNEX A

# Safer Recruitment

### **Safer Recruitment and DBS checks – policy and procedures**

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

The SCR will be monitored and checked by the DSL and Safeguarding Governor on a regular basis, throughout the academic year.

### **Appointing new staff**

When appointing new staff, we will:

- Verify their identity (KSCIE 22 Paragraph 213 - Best practice is checking the name on their birth certificate)
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Secretary of State section 128 direction A section 128 direction prohibits or restricts an unsuitable individual from participating in the management of an independent school, including academies and free schools. 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.
- Ask for written information about previous employment history and check that information is not contradictory or incomplete.
- Staff and volunteers who provide early years or later years childcare and any managers of such childcare are covered by the disqualification regulations of the Childcare Act 2006 and are required to declare relevant information - see statutory guidance: Disqualification under the Childcare Act 2006 (August 2018).

We will seek references on short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments.

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

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children

- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not

### **Existing staff**

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

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

### **Agency and third-party staff**

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

### **Contractors**

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check. This will be:

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

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

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

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

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

### **Trainee/student teachers**

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

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

### **Volunteers**

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

### **Individuals who have lived or worked outside the UK**

Individuals who have lived or worked outside the UK **must** undergo the same checks as all other staff in schools or colleges (set out in paragraphs 213). This includes obtaining (via the applicant) an enhanced DBS certificate (including barred list information, for those who will be engaging in regulated activity)

even if the individual has never been to the UK. In addition, schools and colleges **must** make any further checks they think appropriate so that any relevant events that occurred outside the UK can be considered. Following the UK's exit from the EU, schools and colleges should apply the same approach for any individuals who have lived or worked outside the UK regardless of whether or not it was in an EEA country or the rest of the world

**Governance**

- All members of the governance will have an enhanced DBS check without barred list information and section 128 check. They will have an enhanced DBS check with barred list information if working in regulated activity.