



St. George's School
incorporating **Little Steps Nursery School**
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Head Teacher: Stuart Compton
Nursery Manager: Claire Atkins
Principal: Ellie Graham



Child Protection and Safeguarding Policy

Important contacts

Designated Safeguarding Lead (DSL)	Ellie Graham 07736769711 Ellie.graham@stgeorgesdunstable.co.uk
Deputy DSL	Nursery – Claire Atkins Claire.atkins@stgeorgesdunstable.co.uk School – Sophie Breese Sophie.breese@stgeorgesdunstable.co.uk
Local Authority Designated Officer (LADO)	0300 300 5026/0300 300 8142
Access and Referral HUB	0300 300 8585
Channel helpline	02040 7264

Abbreviations: Where DSL is written in this policy it refers to the Designated Safeguarding Lead or the Deputy Designated Safeguarding Leads. Where 'school' is written it refers to St. George's Independent School and Little Steps Nursery.

1. Aims

1.1. We aim to:

- Provide a safe and secure environment for all children.
- Ensure that appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- Create an environment to encourage children to develop a positive self – image.
- Encourage children to develop a sense of independence appropriate to their age and stage.
- Encourage children to establish satisfying relationships with their peers

and adults around them.

1.2. In order to fulfil these aims:

- Staff are trained on induction and annually thereafter in recognising and reporting safeguarding issues and of their statutory responsibilities with respect to safeguarding.
- Staff read *Keeping Children Safe in Education* Part One and Annex A annually; a copy of this and *Working Together to Safeguard Children* is available for all staff.
- The DSL will receive training every two years.
- Advice will be sought from the Access and Referral Hub or the Early Help Team and children will be referred to these departments when deemed appropriate.
- Children will be taught about Child Protection issues at an age appropriate level.

2. Legislation and Statutory Guidance

2.1. This policy is based on the Department for Education's statutory guidance *Keeping Children Safe in Education (2019)* and *Working Together to Safeguard Children (2018)*. We comply with this guidance and the arrangements agreed and published by our 3 local authority partners.

2.2. This policy is also based on the following legislation:

2.2.1. Part 3 of the Education (Independent School Standards) Regulations 2014, which places a duty on independent schools to safeguard and promote the welfare of pupils at the school.

2.2.2. The Children's Act 1989 (and 2004 amendment), which provides a framework for the care and protection of children.

2.2.3. 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 the age of 18.

2.2.4. Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

2.2.5. The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children.

- 2.2.6. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children.
 - 2.2.7. Statutory guidance on the Prevent Duty, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism.
 - 2.2.8. The Childcare (Disqualification) and Childcare (Early Years Provision Free of Charge) (Extended Entitlement) (Amendment) Regulations 2018 (referred to in this policy as '2018 Childcare Disqualifications Regulation') and Childcare Act 2006, which sets out who is disqualified from working with children.
- 2.3. This policy also meets requirements relating to safeguarding and welfare in the statutory framework for the Early Years Foundation.

3. Definitions

- 3.1. Safeguarding and promoting the welfare of children is defined as:
- Protecting children from maltreatment
 - Preventing impairment of children's health or development
 - Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
 - Taking action to enable all children to have the best outcomes
- 3.2. Child protection – is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.
- 3.3. Abuse – is a form of maltreatment of a child and may involve inflicting or failing to act to prevent harm.
- 3.4. Neglect – is a form of abuse and the persistent failure to meet a child's basic physical and/or psychological needs likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.
- 3.5. Sexting (also known as youth produced sexual imagery) - is the sharing of sexual imagery (photos or videos) by children.
- 3.6. Children – includes everyone under the age of 18.
- 3.7. The following 3 safeguarding partners are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by Chapter 2 of the Children and Social Work Act 2017). They will make

arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The Local Authority (LA) - Central Bedfordshire Council
- The Clinical Commissioning Group for the area - Bedfordshire Clinical Commissioning Group
- The chief officer of police for an area any part of which falls within the local authority area – Bedfordshire Police

4. Equality Statement

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

4.2. We give special consideration to children who:

- Have special educational needs or disabilities
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations
- Are at risk of FGM, sexual exploitation, forced marriage or radicalisation
- Are asylum seekers
- Are at risk due to their own or a family member's mental health needs
- Are looked after or previously looked after.

5. Roles and Responsibilities

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

5.2. All staff:

5.2.1. All staff will read and understand Part 1 and Annex A of the Department for Education's statutory safeguarding guidance, *Keeping Children Safe in Education*, and review this guidance at least annually.

5.2.2. Staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy, and the safeguarding response to children who go missing from education.
- The Early Help Process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to the Local Authority Children's Social Care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals.
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as Child Sexual Exploitation (CSE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation.

5.3. The Designated Safeguarding Lead (DSL):

5.3.1. The DSL is a member of the senior leadership team. Our DSL is Ellie Graham. The DSL takes lead responsibility for child protection and wider safeguarding.

5.3.2. The DSL or deputies will be available during school hours for staff to discuss any safeguarding concern. If not on the premises the DSL can be emailed using the contact details in this policy.

5.3.3. If the DSL is not available, Claire Atkins will act as deputy DSL for the nursery and Sophie Breese as deputy DSL for the school.

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

- Provide advice and support to other staff on child welfare and child protection matters

- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring service, and/or Police), and support staff who make such referrals directly.
- Act as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3).

5.3.5. The DSL will keep the Head Teacher and/or Nursery Manager informed of any issues and liaise with the local authority case managers and designated officers for child protection concerns as appropriate.

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

5.4. The Proprietor:

5.4.1. Will act as the 'case manager' in the event that an allegation of abuse is made against the Head Teacher, where appropriate.

5.5. The Head Teacher/Nursery Manager

5.5.1. The Head Teacher/Nursery Manager is responsible for the implementation of this policy, including:

- Ensuring that staff and volunteers are informed of our systems to support safeguarding, including this policy, as part of their induction
- Communicating this policy to parents via the website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Ensuring that relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

6. Confidentiality

6.1. All suspicions, enquiries and external investigations are shared only with those who need to know and staff should not discuss the actual or alleged behaviour of another person publicly. However, it is understood that:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information are not to stand in the way of the need to promote the welfare, and protect the safety, of children.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk.
- Staff will not promise a child that they will not tell anyone about a report of abuse.
- If staff are in any doubt about sharing information, they should speak to the DSL.

7. Recognising abuse and taking action

7.1. Staff, volunteers and student staff must follow the procedures set out below in the event of a safeguarding issue.

7.2. *Please note – you should take any references to the DSL to mean 'the DSL or deputy DSL'*

7.3. If a child is suffering or likely to suffer harm, or in immediate danger:

7.3.1. Staff will discuss the concern with the DSL, fill in a reporting concerns form and hand it to the DSL (if the DSL and deputies are unavailable, the DSL should be telephoned or emailed)

7.3.2. The DSL will file the concern in a confidential folder and discuss the concern with other staff members as appropriate

7.3.3. The DSL will discuss the concern with the parents/carers unless it is felt that by doing so would put the child's welfare at risk

7.3.4. Should the DSL feel that there is risk of harm to the child, the Access and Referral hub will be contacted

7.3.5. If the child is at significant risk of harm, shows failure to thrive or neglect, appropriate referrals will be made and if necessary and EHA or BIC 100 will be completed. We seek parent's permission before making referrals unless seeking this permission would put the child at risk

7.3.6. If a referral to the Local Authority is not deemed necessary, ongoing concerns will be monitored in a diary of incidents. If the situation does not improve or worsens, referral will be reconsidered.

7.4. Our aim is to identify early indicators of abuse and provide support before the situation escalates. However, if at any point there is a risk of serious immediate harm to a child a referral should be made immediately and can be made by anybody.

7.5. Disclosures

7.5.1. Where a child has made a disclosure to you, you should:

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you – do not tell them they should have told you sooner
- Explain, in age appropriate language, what will happen next. Do not promise to keep it a secret
- Write up the conversation on a 'Reporting Concerns' as fully as possible using the child's words
- Hand the form to the DSL as soon as possible.

7.6. Concerns about a child (as opposed to believing a child is suffering or likely to suffer harm, or is in immediate danger)

- Speak to the DSL and fill in a Reporting Concerns form.
- If, in exceptional circumstances, the DSL or deputies are not available, this should not delay appropriate action being taken. Speak to a member of the Senior Leadership Team or phone the Access and Referral Hub or NSPCC for advice.
- The DSL will discuss referral and monitoring options with you
- If referral is not relevant, monitor the situation and raise again if concerns continue or escalate

- If referral is deemed necessary, you or the DSL will make a referral through the Access and Referral Hub. Within 1 working day, a social worker will make a decision about the type of response required.
- The LA Social Care Team will either take action and inform the referrer or will deem that no formal assessment is required
- If no formal assessment is undertaken by the LA the school will consider Early Help Assessment and access other support as appropriate

7.7. Referral

7.7.1. If it is appropriate to refer the case to the LA Children’s Social Care or the Police, the DSL will make the referral or support you to do so.

7.7.2. To make a referral phone the Access and Referral Hub, if required fill out a BIC100 and send to the LA Children’s Services.

7.7.3. If you make a referral, you must tell the DSL as soon as possible.

7.8. Early Help

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

7.8.2. The DSL will keep the case under constant review and a referral to the LA Social Care will be considered if the situation does not seem to be improving.

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

7.8.4. If the situation does not seem to be improving after the referral, the DSL must escalate procedures with the LA to ensure their concerns have been addressed and that the child’s situation improves.

7.9. FGM

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

- 7.9.2. FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as ‘female genital cutting’, ‘circumcision’ or ‘initiation’.
- 7.9.3. Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4.
- 7.9.4. Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil must immediately report this to the police, personally. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
- 7.9.5. Unless they have a good reason not to, they should also discuss the case with the DSL and involve Children’s Social Care as appropriate.
- 7.9.6. Any other member of staff who discovers that an act of FGM appears to have been carried out on pupil under 18 must immediately speak to the DSL and follow normal safeguarding procedures.
- 7.9.7. The duty for teachers above does not apply in cases where a pupil is at risk of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
- 7.9.8. Any member of staff who suspects a pupil is at risk of FGM or suspects that FGM has been carried out must speak to the DSL and follow the safeguarding procedures.

7.10. Prevent Duty

- 7.10.1. The Prevent duty outlines our regard to prevent children from being drawn into forms of extremism
- 7.10.2. All staff will read the Prevent Duty and understand their responsibilities
- 7.10.3. If you notice indicators of radicalisation but the child is not suffering, or likely to suffer from harm, or in immediate danger, speak to the DSL as the first course of action
- 7.10.4. If, in exceptional circumstances, the DSL is not available, this should not delay action being taken. Speak to a member of the senior leadership team or seek advice from the LA and if appropriate make a referral to them or the police.
- 7.10.5. The DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government’s

programme for identifying and supporting individuals at risk of being drawn into terrorism, or the LA.

7.10.6. The Department for Education also has a dedicated telephone helpline, 020 7340 7264 and email address counter.extremism@education.gov.uk which can be used to raise concerns about extremism with respect to any pupil.

7.10.7. If you think someone is in immediate danger, planning to travel to join an extremist group or see or hear something that may be terrorist related call 999 or the confidential anti-terrorist hotline on 0800 789 321.

7.11. Peer-on-peer abuse

7.11.1. Most cases of pupils hurting other pupils will be dealt with under the behaviour policy, but this policy applies to allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is a serious, potentially criminal offence
- Could put pupils at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, up-skirting or sexually inappropriate pictures or videos.

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

- You must record the allegation and tell the DSL
- The DSL will contact the LA and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed
- The DSL will contact the children and adolescent health services (CAMHS), if appropriate.

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

- Challenging any form of derogatory or age-inappropriate

sexualised language or behaviour, including requesting or sending sexual images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensuring pupils know they can talk to staff confidentially by asking to speak to their teacher at break/lunch time
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy.

7.12. Sexting

- 7.12.1. If you are made aware of an incident involving sexting, you must report it to the DSL immediately.
- 7.12.2. You must not view, download, share or delete the image yourself or ask a pupil to do this.
- 7.12.3. Follow the disclosure guidelines above.
- 7.12.4. The DSL will determine whether there is an immediate risk to any pupils and if a referral needs to be made to the LA or police. They will also determine if it is necessary to view, delete or remove the image for the safety of pupils involved.
- 7.12.5. The DSL, Head Teacher or Nursery Manager will contact all parents/carers of the pupils involved at every stage unless there is a good reason to believe that involving them would put the pupil at greater risk.
- 7.12.6. An immediate referral to the LA (through the Access and Referral Hub) and/or police (by phoning 101) will be made if:
 - The incident involves an adult
 - There is reason to believe a pupil has been coerced, blackmailed or groomed, or if there are concerns about their capacity for consent
 - The imagery contains sexual acts or are violent
 - The DSL has reason to believe a pupil is at significant risk of

harm

7.12.7. If a decision has been made not to refer to the LA or police the DSL will establish facts from all pupils involved and assess the risks.

7.12.8. Pupils are taught about the issues surrounding privacy of particular parts of their body at an age appropriate level during PSHE lessons.

8. Notifying parents

8.1. In most circumstances, we will discuss any concerns with the child's parents/carers. The DSL, Nursery Manager or Headteacher will do this in the event of a suspicion or disclosure.

8.2. If we believe that notifying the parents would increase the risk to the child, we will discuss this with the LA before doing so.

8.3. If allegations have been made against other children, we will notify the parents of all the children involved, while maintaining confidentiality with respect to the names and identity of other children.

9. Concerns about a staff member or volunteer

9.1. If there are concerns about a member of staff, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, these should be raised with the DSL.

9.2. If the concern/allegation is about the DSL it should be taken to the Headteacher or Nursery Manager, alternatively a referral can be made directly to the LA.

9.3. The DSL/Headteacher/Nursery Manager will then follow the procedures set out in appendix 3, if appropriate.

9.4. Where appropriate, the school will inform OFSTED of the allegation and actions taken, within the necessary timescale.

10. Pupils with special educational needs and disabilities (SEND)

10.1. We recognise that children with SEND can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils

- The potential for pupils with SEND being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
 - Communication barriers
- 10.2. We offer extra pastoral support for pupils with SEND by having one to one discussions with them every half term about any concerns they might have or extra support they feel they need. A plan is then put in place with their parents to ensure these needs are met.

11. Mobile phones and Cameras

- 11.1. Staff are allowed to bring their personal phones to school for their own use but will limit such use to non-contact time when children are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with children.
- 11.2. Staff will not take pictures or recordings of children on their personal phones or cameras.
- 11.3. We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

12. Complaints and concerns about school safeguarding policies

- 12.1. Complaints related to safeguarding will be dealt with by the DSL.
- 12.2. All complaints will be fully investigated. The DSL will conduct interviews with any staff members involved to ascertain all facts. Where appropriate the procedure set out in appendix 3 will be followed.
- 12.3. The DSL will respond to the person making the complaint in writing once all evidence has been gathered, explaining the outcomes of the investigation where appropriate.
- 12.4. The DSL and Nursery Manager/Headteacher will identify any lessons learnt and put in place any training required.
- 12.5. We have written procedure for dealing with complaints from parents/carers and keep a record of complaints and their outcomes.
- 12.6. This section is considered in conjunction with our whistle-blowing policy.

13. Record keeping

- 13.1. All safeguarding concerns, discussions, decisions made and the reason for those decisions, must be recorded in writing.
- 13.2. All safeguarding records are kept in paper form. Confidential records

are kept in a folder in a locked filing cabinet, if the case becomes complex or other agencies become involved an individual folder will be set up for the case to be held next to, but not included within, the child's personal folder.

- 13.3. Non confidential records are easily accessible. Confidential records are held securely and only available to those who have a right or professional need to see them.
- 13.4. Safeguarding records relating to an individual child will be retained for a reasonable period of time after they have left the school.
- 13.5. If a child for whom the school has, or has had, safeguarding concerns moved to another school, the DSL will ensure that their child protection file is forwarded promptly and securely, and separately from any other documentation. In addition, if the concerns are significant or complex, the DSL will speak to the DSL of the receiving school to allow them to make any preparations necessary to ensure the safety of the child.
- 13.6. Appendix 2 sets out our policy on record keeping specifically with respect to recruitment and pre-employment checks.
- 13.7. Appendix 3 sets out our policy on record keeping with respect to allegations made against staff.

14. Training

- 14.1. All staff members, students and volunteers will undertake safeguarding and child protection training at induction, to ensure they understand the school's safeguarding systems and their responsibilities and can identify signs of abuse or neglect. This training will be regularly updated and will be in line with advice from the 3 safeguarding partners.
- 14.2. All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
- 14.3. Staff will receive regular safeguarding and child-protection updates as required but at least annually.
- 14.4. The DSL will undertake safeguarding training at least every two years and will update their knowledge and skills at regular intervals.
- 14.5. The DSL will undertake Prevent awareness training.
- 14.6. At least one person conducting any interview for a post at the school will have undertaken safer recruitment training.
- 14.7. All staff who have contact with children and families will have supervisions with the Headteacher/ Nursery Manager which will provide

them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Monitoring Arrangements

15.1. This policy will be reviewed annually by the DSL.

16. Linked Policies

16.1. This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and Safety
- Attendance
- Equality
- First Aid
- Curriculum
- Anti-bullying
- Whistle-blowing

3 March 2020
Ellie Graham, Principal

Internal use only

This policy was adopted on	22/10/19
Date for review	22/10/20

Appendix 1: Types of abuse

In order to fulfil your professional role, recognition and response is key. Should you notice any of the following indicators of abuse you should speak to the DSL and fill in a Reporting Safeguarding Concerns Form.

Emotional Abuse – is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child’s emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone. Indicators of this type of abuse include:

- Low confidence/self esteem
- Controlling parent/carer
- Consistent attention seeking behaviour
- Child puts no value on their work/achievements
- Unable to accept compliments
- Parent puts inappropriate expectations on the child
- Child reports being encouraged to commit illegal act
- Child reports witnessing domestic abuse or violence of another
- Child reports serious bullying
- Overprotection of child

Neglect – is the persistent failure to meet a child’s basic physical and/or psychological needs, likely to result in serious impairment of the child’s health or development. Indicators of this type of abuse may include:

- Lack of cleanliness
- Inappropriate clothing
- Underweight/overweight
- Consistent attention seeking behaviour
- Inappropriate language
- Continual absence from school
- Exclusion from home/abandonment
- Lack of bond with parent

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

include:

- A mark is left on the child (bruise, scratch etc.)
- Parent fabricates symptoms of illness
- Child is inappropriately covered up (i.e. long sleeves in summer)
- Child is kept off school for long periods
- Inconsistent stories about bruises/marks
- Starvation/ force feeding
- Anticipation of physical abuse while being told off
- Role-playing situations of abuse
- Untreated illness/injury
- Asking for protection (including non verbal)
- Bloating caused by water logging
- Bruising just to the ear

If you are unsure as to whether a mark is accidental or not, please refer to NSPCC core info leaflets in Safeguarding File.

Sexual abuse – involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. This may involve physical contact (penetration, kissing etc.) or not (children looking at/watching sexual activities etc.). Indicators of this type of abuse may include:

- Doesn't form relationships easily
- Bruising/ marks/ blood from genital area or upper legs
- Over sexuality – inappropriate sexual language and knowledge
- Role-play sexual abuse
- Child reports witnessing pornographic material

Further indicators of abuse of children with disabilities:

- Force feeding
- Excessive restraint
- Rough handling
- Deprivation of food, liquid, medication, food or clothing
- Misuse of medication e.g. sedation or tranquilisation.

Appendix 2: Safer Recruitment and DBS checks

We record all information on the checks carried out in the school's Single Record of Checks (SRC). Copies of these checks, where appropriate, will be held in individual's personnel files. We follow requirement and best practise in retaining copies of these checks, as set out below.

New Staff

When appointing new staff, we will:

- Verify their identity
- Obtain a DBS certificate, including barred list information for those who will be engaging in regulated activity.
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK
- Verify their professional qualifications where appropriate
- Ensure they are not subject to a prohibition order if they are to be employed as a teacher
- Carry out further 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 record checks or their equivalent
- Check that candidates taking up a management position are not subject to a prohibition from management (section 128) direction made by the secretary of state.
- We ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment in their personnel file. This will include our evaluation of any risk and control measures put in place, and any advice sought.
- We will ask for written information about previous employment history and check that information is not contradictory or incomplete
- We will seek references on all candidates before they start work. 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; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or
- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

If we have concerns about an existing member of staff's suitability to work with children, we will carry out all 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 where:

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

Agency and Third Party Staff

We will obtain written notification from any agency or third-party organisation that it has carried out the necessary safer recruitment checks that we would otherwise perform. We will also check 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 six 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

For self-employed contractors such as music teachers or sports coaches, we will ensure that checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risk and control measures put in place, and any advice sought.

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in a regulated activity
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in a regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in a regulated activity.
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment.

Appendix 3: allegations of Abuse Made Against Staff

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

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

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

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

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

Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when that individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not punishment and parents have been consulted

Definitions for outcomes of allegation investigations

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

Procedure for dealing with allegations

In the event of an allegation which meets the criteria above, the DSL (or Headteacher where the DSL is the subject of the allegation) – the ‘case manager’- will take the following steps:

- Immediately discuss the allegation with the Local Authority Designated Officer (LADO). This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the LADO – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the LADO as soon as is practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and a likely course of action as soon as possible after speaking to the LADO. Where the police or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies
- Where appropriate, carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the LADO and other agencies as appropriate
- If immediate suspension is considered necessary, agree and record rationale for this with the LADO. Include information about the alternatives to suspension that have been considered and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details

- If it is decided that no further action should be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the LADO what information should be put in writing to the individual and by whom, as well as the action that should follow both in respect to the individual and those who made the initial allegation
- If it is decided that further action is needed, take steps as agreed with the LADO to initiate the appropriate action and/or liaise with other agencies as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the development of the case and considering what other support is appropriate
- Inform the parents/carers of the child or children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or police, if applicable). The case manager will also inform the parents/carers of the requirement to maintain confidentiality about any allegation made against staff while the investigations are ongoing. Any parent/carer who wishes to have the confidentiality restrictions lifted should be advised to seek legal advice
- Keep the parents/carers of the child/children informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child
- We will inform OFSTED of any allegations of serious harm or abuse by any person living, working or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made
- If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency
- Where the police are involved, wherever possible the Proprietor will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Timescales

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

Specific Actions

Action following a criminal investigation or prosecution – the case manager will discuss with the LADO whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, taking into account information provided by the police and/or children’s social care services.

Conclusion of a case where the allegation is substantiated – if the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and Proprietor will discuss with LADO whether to make a referral to the DBS for consideration of whether inclusion on the barred list is required. If the individual concerned is a member of teaching staff, the case manager will discuss with the LADO whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension – if it is decided on the conclusion of a case that an individual who has been suspended can return to work, the case manager will consider how best to facilitate this. They will also consider how to best manage the individual’s contact with the child or children who made the allegation, if they are still in attendance.

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

Confidentiality

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

The case manager will take advice from the LADO and other services where appropriate to agree:

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

Record-keeping

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

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

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

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

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

References

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

Learning Lessons

After any case where the allegations are substantiated, we will review the circumstances of the case with the LADO to determine whether any improvements

can be made to the school's procedures or practices to help prevent similar events in the future.

This will include consideration of:

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

Appendix 4 Specific Safeguarding Issues

Children Missing from Education (CME) – if a child has had in excess of 10 days consecutive unauthorised absences with no/insufficient explanation from the parents or if they have left the school without providing details of their subsequent school they will be treated as a child missing education and will be referred to the local authority via a CME form.

Child Sexual Exploitation (CSE) – CSE is a form of sexual abuse that occurs when an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity in exchange for something the victim needs or wants. If a member of staff suspects CSE, they will discuss with the DSL who will then trigger safeguarding procedures including a referral to the local authority and the police.

Homelessness – The DSL will raise concerns at the earliest opportunity with the local authority and provide the family with contact details and referral routes into the local housing authority.

So-called Honour Based Violence (HBV) – All forms of HBV are abuse and will be escalated as such. If staff have a concern they will discuss this with the DSL who will activate local safeguarding procedures.

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

Indicators that FGM has already occurred include:

- A pupil confiding that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/pupil already being known to social services in relation to other safeguarding issues
- A girl having difficulty walking, sitting or standing, spending longer than usual in the bathroom, avoiding PE, talking about pain or discomfort between her legs.

Potential signs a pupil may be at risk from FGM include:

- The girl's family having a history of practising FGM
- FGM being known to be practised in the girl's community or country of origin
- Family not engaging with professionals or other agencies
- Family not being well integrated within UK society
- A girl talking about a long holiday to have a 'special procedure' or to 'become a woman'

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

Preventing Radicalisation - All staff will read the Prevent Duty and understand their responsibilities in terms of preventing children from being drawn into extremist views.

Any indicators of radicalisation will be reported to the DSL through the means outlined in this policy and, if necessary, reported to Channel.

All staff will promote the Fundamental British Values of Rule of Law, Democracy, Individual Liberty and Mutual Respect and tolerance and behaviour shown by any member of the school community that contradicts these values will not be tolerated.

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

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

Checking the identity of visitors

All visitors will be required to verify their identity to the satisfaction of staff and not use their mobile phones during their visit.

If a professional visitor is unknown to the setting they will be asked to produce identification. All other visitors will be accompanied by a member of staff at all times.

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

Non-collection of children

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

- Phone all contact numbers provided for the child and make arrangements with a person approved by parents/carer to collect the child.
- If we have not been able to contact an approved person or make arrangements with the parent/carer we will wait for an hour after due collection time if collection time was before 6.00 or half an hour after collection time if this was between 6.00pm and 6.30pm
- At this point we will phone the LA children's social care services
- We will wait with the child at the setting until appropriate collection arrangements have been made.
- A written record of events will be kept in the child's file

Missing Pupils

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

- A senior member of staff will search the area immediate to the setting and another member of staff will search the school premises, ensuring that all other children are kept safe.
- The child's parents/carers will be contacted as will the LA children's social care services and the police.
- Once found, the senior member of staff will stay with the child until their parents/carers arrive.
- OFSTED will be notified at the earliest opportunity
- A written record of the circumstances including all conversations will be kept
- Staff involved will be interviewed and the DSL and Nursery Manager/Headteacher will identify lessons learnt and give further training where necessary