Grays Convent

HIGH SCHOOL

Child Protection and Safeguarding Policy 2023–24

This Policy was adopted by the Governing Body Summer 2023.

This Policy will be reviewed in Summer 2024 and annually thereafter.

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Important contacts

ROLE/ORGANISATION	NAME	CONTACT DETAILS
Designated safeguarding lead (DSL)	Dawn Collis	01375 376173 ext 233 collisd@graysconvent.thurrock.sch.uk
Deputy DSL	Katie Wells	01375 376173 ext 282 wellsk@graysconvent.thurrock.sch.uk
Senior Pastoral Manager	Liz Bishop	01375 376173 ext 283 bishopl@graysconvent.thurrock.sch.uk
Headteacher	Penny Johnson	01375 376173 ext 222 wellsk@graysconvent.thurrock.sch.uk
Chair of governors	Laurie Eve	chairofgovernors@graysconvent.thurrock.sch.uk
Nominated safeguarding governor	Laurie Eve	chairofgovernors@graysconvent.thurrock.sch.uk
Safeguarding and Child Protection Coordinator and Local authority designated officer (LADO)	Trevor Willis - Mon, Tue, Fri Adetutu 'Tutu' Temowo – Wed, Thu	Carole Fuller/Marie Jerman (LADO Admin) – 07762 406606 lado@thurrock.gov.uk
Multi-agency Safeguarding Hub (MASH)		01375 652802
Emergency Duty Team		01375 372468 (out of hours)
Police Child Abuse Investigation Team		01277 266822

Mission statement

At Grays Convent we recognise the value of each individual as a gift from God to the world. We are a Catholic school founded by the La Sainte Union Sisters and our ethos is one of unity, prayer, worship, service and work. We strive to follow the example of the Sacred Hearts of Jesus and Mary by enabling learning to take place in a caring and accepting community. We are blessed by Jesus the Good Shepherd, try to follow him in everything that we do, and in doing so make the most of our God given talents. We are one with God.

Child protection statement

We recognise our moral and statutory responsibility to safeguard and promote the welfare of all pupils. We endeavour to provide a safe and welcoming environment where children are respected and valued. We promote a culture of vigilance and inclusion, and are alert to the signs of abuse and neglect and follow our procedures to ensure that children receive effective support, protection and justice.

The procedures contained in this policy apply to all staff and governors and are consistent with those of the Local Safeguarding Children Partnership – i.e. the guidance set out in the SET (Southend, Essex and Thurrock) Child Protection Procedures.

Policy principles

- Welfare of the child is paramount
- All children, regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection
- All staff have an equal responsibility to act on any suspicion or disclosure that may suggest a child is at risk of harm
- Pupils and staff involved in child protection issues will receive appropriate support

1. Aims

The school aims to ensure that:

- Our community is safe and secure, with a culture of vigilance and inclusion
- A culture where staff feel comfortable discussing safeguarding matters in and outside of work including online (KCSIE paragraph 343).
- We encourage a culture of listening to children and taking account of their wishes and feelings
- Appropriate action is taken in a timely manner to safeguard and promote children's welfare
- All staff are aware of their statutory responsibilities with respect to safeguarding
- Staff are properly training in recognising and reporting safeguarding issues
- Our curriculum, Child Protection Team and Pastoral support systems all underpin our work keeping children safe.

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance Keeping Children Safe in Education (2022) and Working Together to Safeguard Children (2018), and the Governance Handbook. We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

- 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 conducting an interview to be trained in safer recruitment techniques
- 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
- Statutory guidance on FGM, which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- The Rehabilitation of Offenders Act 1974, which outlines when people with criminal convictions can work with children
- 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 Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

Keeping Children Safe in Education explains that in relation to safeguarding:

- **Human Rights Act 1998:** being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to schools under the European Convention on Human Rights (ECHR) (paragraph 85)
- **Equality Act 2010:** governing bodies and proprietors should carefully consider how they're supporting their pupils and students regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race) under the Equality Act (paragraph 88)

- **Public Sector Equality Duty (PSED):** you can take positive action to deal with particular disadvantages affecting pupils (where you can show it's proportionate). This includes making reasonable adjustments for disabled pupils. You could consider using it, for example, to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment (paragraph 89)
- Under the PSED, you must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps your school to focus on key issues and how to improve student outcomes. Some pupils may be more at risk of harm from issues such as sexual violence, homophobic, biphobic, transphobic bullying or racial discrimination (paragraphs 92 and 93)

3. Definitions

Safeguarding and promoting the welfare of children means:

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

Child protection is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

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

Neglect is a form of abuse and is the persistent failure to meet a child'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.

Sharing of nudes and semi-nudes (also known as sexting or youth produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. Children includes everyone under the age of 18.

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

4. Equality statement

Some children have an increased risk of abuse both online and offline, and additional barriers can exist for some children with respect to recognising or disclosing it, for example some pupils might not be able to understand the difference between fact and fiction in on-line content and might repeat the content/behaviours in the school setting. We are committed to anti-discriminatory practice and recognise children's diverse circumstances. We ensure that all children have the same protection, regardless of any barriers they may face.

We give special consideration to children who:

- Have special educational needs (SEN), disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Have health conditions
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 11)
- Are missing from education. Please note this term is different from 'children absent from education' – supporting children who are absent from education helps prevent the risk of them becoming a child missing education in the future (KCSIE paragraph 175). KCSIE 23 now states that attendance can be impacted by mental health issues
- Whose parent/carer has expressed an intention to remove them from school to be home educated

5. Roles and responsibilities

Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors 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.

We understand that we play a crucial role in preventative education preparing pupils for life in modern Britain and a culture of zero tolerance to any form of discrimination such as racism, sexism, misogyny/misandry, homophobia, bi-phobic and sexual violence or harassment.

This is underpinned by:

- Our Catholic Ethos where the dignity of the person is paramount
- Our Behaviour Policy
- Our Pastoral Support systems
- Our comprehensive, inclusive RSHE programme which addresses issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

5.1 All staff

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

All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, on-line safety policy including our filtering and monitoring systems, broader cyber security and the safeguarding response to children who go missing from education
- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children'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-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

Section 15 and appendix 4 of this policy outline in more detail how staff are supported to do this.

More detail on the terms 'victim', 'alleged perpetrator' and 'perpetrator'

In the 'summary' section at the beginning of the guidance (page 4), KCSIE specifies that:

- 'Victim' is a widely understood and recognised term, but not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. You should be prepared to use any term the child feels most comfortable with when managing an incident
- 'Alleged perpetrator(s)' and 'perpetrator(s)' are widely used and recognised terms, but you should think carefully about what terminology you use (especially in front of children), as in some cases, abusive behaviour can be harmful to the perpetrator too. You should decide what's appropriate and which terms to use on a case-by-case basis

5.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Dawn Collis, Deputy Headteacher. The DSL takes lead responsibility for child protection and wider safeguarding.

During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. Out of hours the DSL can be contacted by email (collisd@graysconvent.thurrock.sch.uk).

When the DSL is absent, the Deputy DSL – Katie Wells, Assistant Head – will act as cover.

If the DSL and Deputy DSL are not available, Liz Bishop, Senior Pastoral Manager will act as cover (for example, during out-of-hours/out-of-term activities).

The DSL and Child Protection Team will be given the time, funding, training, resources 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
- Ensure that children have an appropriate adult where necessary – please see link to statutory guidance PACE Code C 2019 – Appropriate Adult

- Take responsibility along with the DDSL for understanding our filtering and monitoring systems and processes

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

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

5.3 The governing body

The governing body will facilitate a whole-school approach to safeguarding including on-line safety, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development. All members of the governing body will receive safeguarding training at the beginning of the academic year or in follow-up sessions for governors.

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

The governors must make sure:

- Your designated safeguarding lead (DSL) has the appropriate status and authority to carry out their job. Governing bodies need to give the DSL the additional time, funding, training, resources and support needed to carry out their role effectively (paragraph 103)
- Online safety is a running and interrelated theme whilst devising and implementing their whole school or college approach to safeguarding and related policies/procedures (this has now been specified as a responsibility of governing bodies and proprietors) (paragraph 137)
- The leadership team and relevant staff are aware of and understand the filters and monitoring https://www.gov.uk/guidance/meeting-digital-and-technology-standards-in-schools-and-colleges/filtering-and-monitoring-standards-for-schools-and-colleges
- systems in place, manage them effectively and know how to escalate concerns (paragraph 141)
- Your school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns), about staff members (including supply staff, volunteers and contractors). See paragraph 152
- The child protection policy reflects that children with special educational needs or disabilities (SEND), or certain medical or physical health conditions can face additional barriers, including cognitive understanding (being unable to understand the difference between fact and fiction in online content and then repeating the content/behaviours in schools or colleges, or the consequences of doing so). See paragraph 199
- Seek assurance that where another body is providing services or activities, that they have appropriate safeguarding and child protection policies/procedures in place. This applies regardless of whether or not the children who attend these services/activities are children on the school roll/attend the college (paragraph 167)

The governing body have appointed Laurie Eve, DSL trained, as Safeguarding Governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The chair of governors, Laurie Eve, will act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education.

Section 16.3 of this policy has information on how governors are supported to fulfil their role.

5.4 The headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - are informed of our systems which support safeguarding, including this policy, as part of their induction

- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)

6. Confidentiality

All staff must understand that timely information sharing is essential to effective safeguarding. Equally child protection issues warrant a high level of confidentiality, therefore staff should only discuss concerns with the designated person, Head Teacher or Chair of Governors (depending on who is the subject of the concern). That person will then decide who else needs to have the information and they will disseminate it on a 'need-to-know' basis. However, fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children.

6.1 Information sharing

- 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 should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)
- In the case of a pupil asking the school not to tell anyone about sexual violence or harassment they have been a victim of, please see section 7.8 "regarding anonymity"
- Confidentiality is also addressed in this policy with respect to record-keeping in section 15, and allegations of abuse against staff in appendix 3

6.2 Reporting directly to child protection agencies

Staff should follow the reporting procedures outlined in this policy.

However, they may also share information directly with children's social care, police or the NSPCC if:

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

6.3 Information management

Child protection information will be stored and handled in line with Data Protection Act 2018 principles. Information is:

- processed for limited purposes

- adequate, relevant and not excessive
- accurate
- kept no longer than necessary
- processed in accordance with the data subject's rights
- secure, in a central locked filing cabinet separate from pupils' regular files.

Record of concern forms and other written information will be stored in a locked facility and any electronic information will be password protected and only made available to relevant individuals.

7. Recognising abuse and taking action

Staff, volunteers and governors must follow the procedures set out below in the event of a safeguarding issue or concern no matter how small.

Please note – in this and subsequent sections, you should take any references to the DSL to mean "the DSL (or deputy DSL)".

- Explaining that children may not feel ready, or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL) (paragraph 19)

7.1 If a child is suffering or likely to suffer harm, or in immediate danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral to Thurrock MASH**, although in practice the DSL, Deputy DSL or Senior Pastoral Manager will make the referral in school hours.

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

7.2 If a child makes a disclosure to you

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

- Listen to and believe them. Allow them time to talk freely and do not ask leading questions
- Stay calm and do not show that you are shocked or upset
- Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner
- Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret
- Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it
- Sign and date the write-up and pass it on to the DSL. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so. Aside from these people, do not disclose the information to anyone else unless told to do so by a relevant authority involved in the safeguarding process

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

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

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

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

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

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

The DSL or member of the child protection team will refer the matter to the MASH team.

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

Figure 1 on page 11 illustrates the procedure to follow if you have any concerns about a child's welfare.

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

Early help

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

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

Referral

If it is appropriate to refer the case to Thurrock MASH team, local authority children's social care or the police, the DSL will make the referral or support you to do so.

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

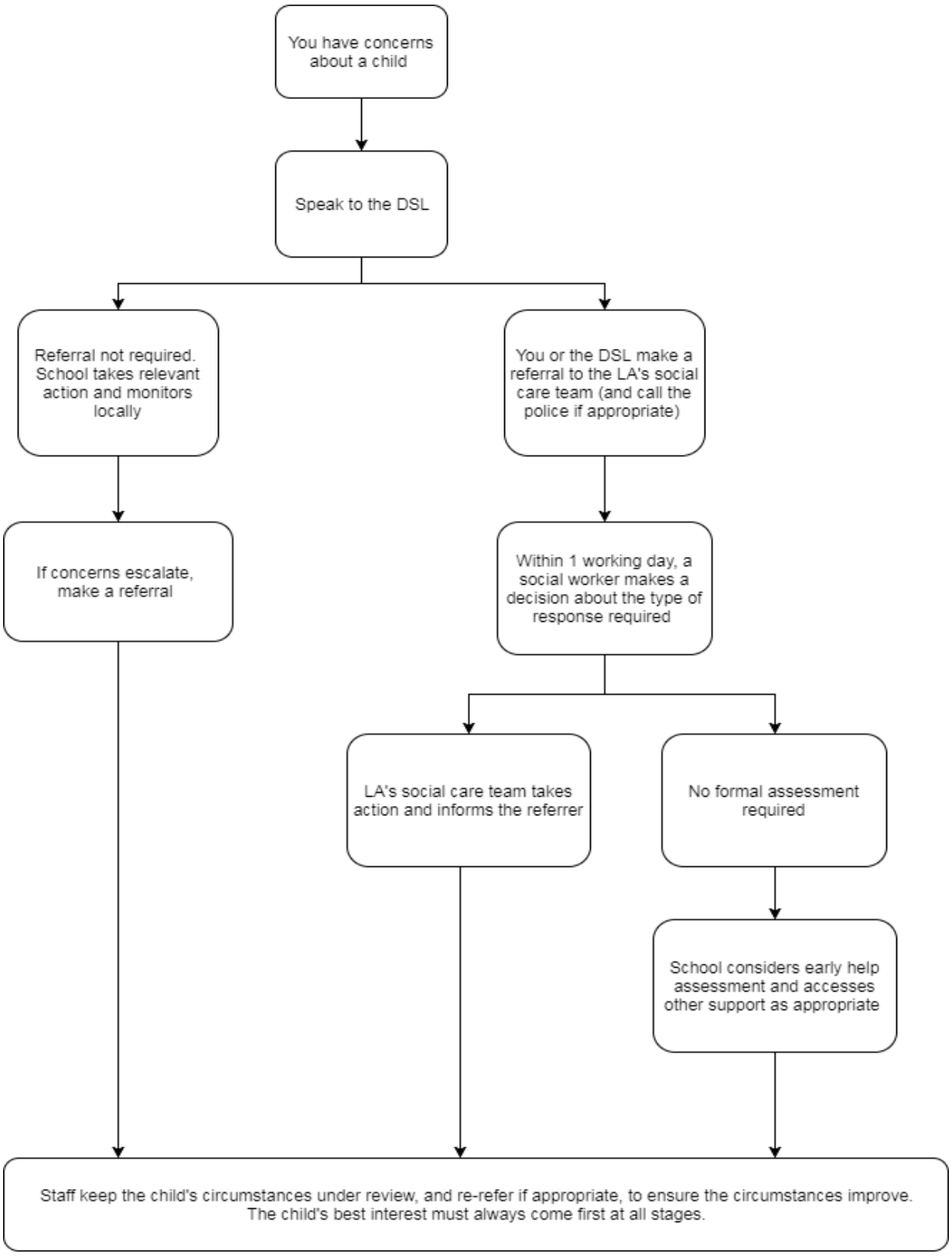
The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person who made the referral must follow up with the local authority if this information is not made available, and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

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

This involves attending meetings liaising with social services to improve outcomes for children and young people.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)

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



7.5 If you have concerns about extremism

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or seek advice from local authority children's social care. Make a referral to local authority children's social care directly, if appropriate (see 'Referral' above). Inform the DSL or deputy as soon as practically possible after the referral.

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, far right extremism, other extreme ideology, or the local authority children's social care team. If a referral to Channel is made the person will be required to provide their consent before any support is provided.

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

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

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

7.6 If you have a mental health concern

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.

KCSIE 23 now recognises that mental health issues can impact on pupil's attendance.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

If you have a mental health concern that is **not** also a safeguarding concern, speak to the DSL to agree a course of action.

The DSL or member of the child protection team will refer mental health concerns to EWMHS (Emotional Wellbeing Mental Health Service) or the school nurse.

7.7 Concerns about a staff member, supply teacher or volunteer

If you have concerns about a member of staff (including a supply teacher, volunteer or contractor), or an allegation is made about a member of staff (including a supply teacher, volunteer or contractor) posing a risk of harm to children, speak to the headteacher as soon as possible. If the concerns/allegations are about the headteacher, speak to the chair of governors.

The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.

Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).

If staff have a safeguarding concern/allegation about another staff member (including supply staff, volunteers and contractors) that doesn't meet the harm threshold, then they should share it in accordance with your low-level concerns policy (paragraph 73)

Note: Use of Grays Convent premises – although we currently do not let our premises for extra-curricular activities, KCSIE 23 states that if our school receives an allegation related to an incident where an individual or organisation was using our school premises for running an activity with children, we should follow our

safeguarding policies and inform the LADO as with any other allegation. Keeping Children Safe in Out of School Settings (see paragraph 167

7.8 Allegations of abuse made against other pupils –child-on-child abuse and sexual harrassment (see Appendix 12)

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up", as this can lead to a culture of unacceptable behaviours and an unsafe environment for pupils.

We also recognise the gendered nature of child-on-child abuse. However, all child-on-child abuse is unacceptable and will be taken seriously.

Abuse in intimate relationships between children is sometimes known as teenage relationship abuse.

Most cases of pupils hurting other pupils will be dealt with under our school's behaviour policy, but this child protection and safeguarding policy will apply to any allegations that raise safeguarding concerns. This might include where the alleged behaviour:

- Is serious, and potentially a criminal offence - Rape, assault by penetration, sexual assault and upskirting are crimes. Where a report of rape, assault by penetration or sexual assault and crimes of upskirting is made, this should be referred to the police. Whilst the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)
- Abuse in intimate personal relationships, teenage relationship abuse, between children/young people is also a form of child-on-child abuse

See appendix 4 for more information about child-on-child abuse.

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the Thurrock MASH and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will balance the victims wishes against their duty to protect the victim and other children
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s) a referral to SERICC local specialist service supporting victims of sexual violence or abuse, 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 CAMHS (Child & Adolescent Mental Health Service) and other specialist providers, if appropriate such as SERICC and SARC for support for victims of sexual violence/abuse. Please see Appendix 11 for contact details
- The DSL will contact parents and carers to keep them informed unless this puts the victim at greater risk
- At all times the wishes and feelings of the victim will be respected but confidentiality cannot be promised
- Appropriate support will be sought for the perpetrator and their family.
- The basic safeguarding principal is: if a child is at risk of harm, is in immediate danger or has been harmed a referral should be made to Local Authority Children's Social Care

Regarding anonymity, we will:

- Be aware of the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system
- Do all we reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report and any support for the children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

Sanctions and the alleged perpetrator(s)

- The DSL will take the lead role
- We can take issue appropriate sanctions whilst other investigations are ongoing e.g. by the police
- The fact another body is investigating/has investigated an incident doesn't (in itself) prevent us from coming to our own conclusion about what happened and impose a penalty accordingly. This is a matter for us and we should consider it on a case-by-case basis
- We will consider whether:
    - Taking action would prejudice an investigation and/or subsequent prosecution - liaise with the police and/or LA children's social care to determine this
    - There are circumstances that make it unreasonable/irrational for us to reach our own view about what happened
- We can, and should, take disciplinary action and still provide support at the same time if necessary

Working with parents and carers

- We will engage with both the victim's and alleged perpetrator's parents or carers when there's been a report of sexual violence (this might not be necessary in relation to sexual harassment, but decide it on a case-by-case basis)
- The exception is if there's reason to believe informing a parent or carer will put the child at additional risk
- We will think carefully about what information we provide about the other child involved, and when. Making sure we work with relevant agencies to ensure our approach to information sharing is consistent
- It's good practice to:
    - Meet the victim's parent or carers with the victim to discuss what's being put in place to safeguard and support them, and how the report will progress
    - Meet with the alleged perpetrator's parents or carers to discuss what's being put in place that will impact them, e.g. moving them out of classes with the victim. We should explain the reason behind any decision
- The DSL will attend these meetings - decide what other agencies should attend on a case-by-case basis

Safeguarding other children

- We will consider supporting children (and adult students) who have witnessed sexual violence, especially rape and assault by penetration
- We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not being bullied or harassed
- Social media is likely to play a role in the fall out from any incident/alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side
- We will consider school transport as part of our risk assessment as a potentially vulnerable place for a victim or alleged perpetrator(s)
- We will keep our policies, processes and curriculum constantly under review to protect all children
- Reports of sexual violence and/or harassment may:
    - Point to environmental/systematic problems that could be addressed by updating policies, processes and the curriculum
    - Reflect wider issues in the local area

Extra clarity that:

- It should be made clear to all victims that the law on child-on-child abuse is there to protect them, not criminalise them
- We will consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Schools, as relevant agencies, should be part of discussions with statutory safeguarding partners to agree to the levels for the different types of assessment as part of local arrangements
- If there are delays in the criminal process, it will be important for the DSL to work closely with the police (and other agencies as required) whilst protecting children and/or taking any disciplinary measures against the alleged perpetrator(s) – this is to make sure the school's actions don't jeopardise the police investigation. If you have any questions about the investigation, you should contact the police
- When supporting the victim, we will:
    - Regularly review decisions and actions, and update relevant policies with lessons learnt
    - Look out for potential patterns of concerning, problematic or inappropriate behaviour, and where you identify a pattern, decide on a course of action
    - Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether extra teaching time and/or staff training could minimise the risk of it happening again
- Children who have experienced sexual violence can display a wide range of responses, so schools should remain alert to the possible challenges of detecting those signs and show sensitivity to their needs

Creating a supportive environment in school and minimising the risk of child-on-child abuse

We recognise the importance of taking proactive action to minimise the risk of child-on-child abuse, and of creating a supportive environment where victims feel confident in reporting incidents.

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images
- Be 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
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

- 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
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns

7.9 Sharing of nudes and semi-nudes

This approach is based on guidance from the UK Council for Internet Safety for all staff and for DSLs and senior leaders.

Your responsibilities when responding to an incident

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

You must **not**:

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

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

Initial review meeting

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

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery has been shared widely and via what services and/or platforms (this may be unknown)
- Whether immediate action should be taken to delete or remove images from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

- The incident involves an adult
- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above apply then the DSL, in consultation with the headteacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care. The decision will be made and recorded in line with the procedures set out in this policy.

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

If at any point in the process there is a concern that a pupil has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through the Thurrock MASH team or Essex Police on 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded. The record-keeping arrangements set out in section 14 of this policy also apply to recording these incidents.

Curriculum coverage

Pupils are taught about the issues surrounding sharing nudes as part of our PSHE education and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

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

Pupils also learn the strategies and skills needed to manage:

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

This policy on the sharing of nudes and semi-nudes is also shared with pupils so they are aware of the processes the school will follow in the event of an incident.

7.10 Reporting systems for our pupils

Our RSHE programme informs pupils about healthy and respectful relationships.

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.

We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Ensure pupils understand that the laws on sexual harassment and abuse exist to protect children not to criminalise them

Pupils are encouraged to report concerns to any member of the Child Protection Team, or any other trusted member of staff. Our confidential email address is available to all to report concerns. Pupils have key information and contact information in their planners and in public spaces in school.

8. Online safety and the use of mobile technology

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues.

To address this, our school aims to:

- Have robust filtering and monitoring processes in place to ensure the online safety of pupils, staff, volunteers and governors
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

Our approach to online safety is based on addressing the following categories of risk:

- **Content** – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- **Contact** – being subjected to harmful online interaction with other users, such as 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** – personal online behaviour that increases the likelihood of, or causes, harm, such as 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

To meet our aims and address the risks above we will:

- Educate pupils about online safety as part of our curriculum. For example:
    - The safe use of social media, the internet and technology
    - Keeping personal information private
    - How to recognise unacceptable behaviour online
    - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use including cyber security and our filtering and monitoring procedures and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
    - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
    - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the DfE's guidance on searching, screening and confiscation
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

This section summarises our approach to online safety and mobile phone use. For comprehensive details about our school's policy on online safety and the use of mobile phones, please refer to our online safety policy and mobile phone policy, which you can find on our website.

9. Notifying parents or carers

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

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

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

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

10. Pupils with special educational needs, disabilities or health conditions

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions including mental health issues 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 or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

We offer extra pastoral support for pupils with SEN and disabilities. This includes regular review meetings with pupil, parents, SENCO and wider agencies.

11. Pupils with a social worker

Pupils may need a social worker due to safeguarding or welfare needs. We recognise that a child's experiences of adversity and trauma can leave them vulnerable to further harm as well as potentially creating barriers to attendance, learning, behaviour and mental health.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children.

Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it will inform decisions about:

- Responding to unauthorised absence or missing education where there are known safeguarding risks
- The provision of pastoral and/or academic support

12. Looked-after and previously looked-after children

We will ensure that staff have the skills, knowledge and understanding to keep looked-after children and previously looked-after children safe. In particular, we will ensure that:

- Appropriate staff have relevant information about children's looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements
- The DSL has details of children's social workers and relevant virtual school heads

We have appointed a designated teacher, Lucie Burrows, Assistant Headteacher, who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

- Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
- Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

13. Mobile phones and cameras

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

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

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. To protect pupils we will seek parental consent, asking parents to opt out if necessary. For further details please see our Photographs and Digital Images Policy.

14. Complaints and concerns about school safeguarding policies

14.1 Complaints against staff

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

14.2 Other complaints

Please refer to our Complaints Policy. Our complaints procedures will be followed where a pupil or parent raises a concern that does not reach the threshold for child protection action.

Complaints are managed by senior staff, the Headteacher and governors.

14.3 Whistleblowing

The school's Whistleblowing Policy (see Appendix 6) enables staff to raise concerns or allegations in confidence and for an investigation to take place. All concerns of poor practice or possible abuse of children by colleagues should be reported to the Headteacher. Complaints about the Headteacher should be reported to the Chair of Governors, Laurie Eve.

The Whistleblowing Policy is displayed in the Safeguarding area of the staff room noticeboard and is published on the school's website as part of the Child Protection Policy.

15. Record-keeping

CPOMS – Child Protection Online Management System, a software programme for monitoring safeguarding and other pastoral issues is now installed. Key users have been trained and will record safeguarding concerns on CPOMS. We can also transfer and receive pupil records using this programme. Hard copy files will be securely retained with a note on CPOMS to refer to these where necessary.

We will hold records in line with our records retention schedule.

All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing. If you are in any doubt about whether to record something, discuss it with the DSL.

Records will 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

Concerns and referrals will be kept in a separate child protection file for each child.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them.

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

Safeguarding records which contain information about allegations of sexual abuse will be retained for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry.

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

In addition to CPOMS our hard copy safeguarding records are held in a locked filing cabinet in our Inclusion Room. Only members of the child protection team have access to these files. Safeguarding information is shared with staff on a need-to-know basis. The child protection team share information where appropriate

with other agencies including the Thurrock MASH team, local schools, children's services and health professionals.

In addition:

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

16. Training

16.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures and online safety, our filtering and monitoring systems and cyber security to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect.

This training will be regularly updated and will:

- Be integrated, aligned and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning
- Be in line with advice from the 3 safeguarding partners
- Have regard to the Teachers' Standards to support the expectation that all teachers:
    - Manage behaviour effectively to ensure a good and safe environment
    - Have a clear understanding of the needs of all pupils

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.

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

A record of all child protection training will be kept.

16.2 The DSL and Deputy DSL

The DSL and Deputy DSL will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

16.3 Governors

All governors receive safeguarding (including on-line safeguarding) training about safeguarding, to make sure they have the knowledge and information needed to understand our whole school approach to safeguarding and to perform their functions and understand their responsibilities.

As the chair of governors may be required to act as the 'case manager' in the event that an allegation of abuse is made against the headteacher, they receive training in managing allegations for this purpose.

16.4 Recruitment – interview panels

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

In line with recent Keeping Children Safe in Education guidance, an online search of short-listed candidates can be considered to identify any issues that are available online. Short-listed candidates should be informed that an online search might be conducted as part of due diligence checks in the recruitment process (KCSIE paragraph 22). If allegations, concerns raised about a member of staff have been found to be false, unfounded, malicious or unsubstantiated, these will not be included in a reference.

See appendix 2 of this policy for more information about our safer recruitment procedures.

16.5 Staff who have contact with pupils and families

All staff who have contact with children and families will have support from their line manager and colleagues in the child protection team in order to allow for confidential discussions of sensitive issues. Opportunities for specialist training will be provided to promote the interests of children in our care.

17. Monitoring arrangements

This policy will be reviewed **annually** by Dawn Collis, Deputy Headteacher and DSL. At every review, it will be approved by the full governing board.

18. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct – see Appendix 5 (https://static1.squarespace.com/static/5d1a13cccf0914000188611b/t/60cc63d2a37417307c3640fb/1624007635902/Code+of+Conduct+Policy+-+Autumn+2019+%2804.11.19%29.pdf
- Complaints
- Health and safety
- Attendance
- Online safety
- Equal Opportunities
- RSHE
- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistleblowing
- Anti-Bullying
- IT Acceptable Use
- Use of Photography and Digital Images
- E-safety and Internet Use
- Drugs Education Policy Procedures

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

Appendix 1: types of abuse

Abuse, including neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases, multiple issues will overlap.

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

Emotional abuse 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.

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

Sexual abuse involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve:

- Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing
- Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy as a result of maternal substance abuse.

Once a child is born, neglect may involve a parent or carer failing to:

- Provide adequate food, clothing and shelter (including exclusion from home or abandonment)
- Protect a child from physical and emotional harm or danger
- Ensure adequate supervision (including the use of inadequate care-givers)
- Ensure access to appropriate medical care or treatment

It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Please be aware that children may not feel ready or know how to tell someone they are being abused, exploited or neglected, and/or they might not recognise their experiences as harmful. Children may feel embarrassed, humiliated or threatened due to their vulnerability, disability, sexual orientation and/or language barriers. None of this should stop staff from having a 'professional curiosity' and speaking to the designated safeguarding lead (DSL) (paragraph 19)

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

Recruitment and selection process

To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.

We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

- Our school's commitment to safeguarding and promoting the welfare of children
- That safeguarding checks will be undertaken
- The safeguarding requirements and responsibilities of the role, such as the extent to which the role will involve contact with children
- Whether or not the role is exempt from the Rehabilitation of Offenders Act 1974 and the amendments to the Exceptions Order 1975, 2013 and 2020. If the role is exempt, certain spent convictions and cautions are 'protected', so they do not need to be disclosed, and if they are disclosed, we cannot take them into account

Application forms

Our application forms will:

- Include a statement saying that it is an offence to apply for the role if an applicant is barred from engaging in regulated activity relevant to children (where the role involves this type of regulated activity)
- Include a copy of, or link to, our child protection and safeguarding policy and our policy on the employment of ex-offenders

Shortlisting

Our shortlisting process will involve at least 2 people and will:

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Consider carrying out an on-line search on short-listed candidates to help identify any issues that are publicly available on-line.

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

Seeking references and checking employment history

We will obtain references before interview. Any concerns raised will be explored further with referees and taken up with the candidate at interview.

When seeking references we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this
- Explore any potential areas of concern to determine the candidate's suitability to work with children
- Record all information considered and decisions made

Pre-appointment vetting checks

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

New staff

All offers of appointment will be conditional until satisfactory completion of the necessary pre-employment checks. When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- 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. Where available, these will include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked

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

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

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

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
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment

Governors

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

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

All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Staff working in alternative provision settings

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

Adults who supervise pupils on work experience

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

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

Pupils staying with host families

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

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

Appendix 3: allegations of abuse made against staff

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

- Behaved in a way that has harmed a child, or may have harmed a child, and/or
- Possibly committed a criminal offence against or related to a child, and/or
- Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position, and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there 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 the 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 a punishment and parents/carers have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the local authority

If in doubt, the case manager will seek views from the school's personnel adviser and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

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, or to cause harm to the subject of the allegation
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded**: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

- Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
- Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/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 (in the circumstances described above), 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 designated officer, police and/or children's social care services, as appropriate
- Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. We will for example encourage the individual facing the allegation to seek the support of a trade union representative, a trusted colleague, or the Education Support Helpline.
- Inform the parents or carers of the child/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 the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
- 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

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 school 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.

Additional considerations for supply teachers and all contracted staff

If there are concerns or an allegation is made against someone not directly employed by the school, such as a supply teacher or contracted staff member provided by an agency, we will take the actions below in addition to our standard procedures.

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

When using an agency, we will inform them of our process for managing allegations, and keep them updated about our policies as necessary, and will invite the agency's HR manager or equivalent to meetings as appropriate.

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

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

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality and information sharing

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, police and children's social care services, as appropriate, to agree:

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

Record-keeping

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

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken, decisions reached and the outcome
- A declaration on whether the information will be referred to in any future reference

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

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

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated or malicious
- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

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

This will include consideration of (as applicable):

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

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out in section 1 above.

Concerns may arise through, for example:

- Suspicion
- Complaint
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

Definition of low-level concerns

The term 'low-level' concern is any concern – no matter how small – that an adult working in or on behalf of the school may have acted in a way that:

- Is inconsistent with the staff code of conduct, including inappropriate conduct outside of work, **and**
- Does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the designated officer at the local authority

Examples of such behaviour could include, but are not limited to:

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Using inappropriate sexualised, intimidating, humiliating or offensive language

Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

Responding to low-level concerns

If the concern is raised via a third party, the headteacher will collect evidence where necessary by speaking:

- Directly to the person who raised the concern, unless it has been raised anonymously
- To the individual involved and any witnesses

The headteacher in collaboration with the DSL will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. If there are doubts as to whether a low-level concern meets the harm threshold, then the LADO should be consulted for advice.

Record keeping

All low-level concerns will be recorded in writing. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through our disciplinary procedures or, where a pattern of behaviour moves from a concern to meeting the harms threshold as described in section 1 of this appendix, we will refer it to the designated officer at the local authority
- Retained at least until the individual leaves employment at the school

Where a low-level concern relates to a supply teacher or contractor, we will notify the individual's employer, so any potential patterns of inappropriate behaviour can be identified.

References

We will not include low-level concerns in references unless:

- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

Appendix 4: specific safeguarding issues

Child abduction

Child abduction is when children are taken from their parents or carers without permission. It can be committed by parents or other family members, by people known but not related to the child (like neighbours, friends and acquaintances) and by strangers. As a secondary school we do not have pick up procedures but we can ensure that pupils go home with known adults. If you see anything suspicious report it immediately.

Children missing from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families
- KCSIE 23 includes the term “children who are absent from education” to reflect the difference between these children and children missing education. The guidance implies that CME is the next step up from children being absent from education.

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

Where pupils are missing from education the school will follow local authority procedures for CME (see Attendance Policy). We follow the Thurrock Council guidance laid out in their document entitled “Protocol and procedures for: children missing education; children not in receipt of full time education; children missing from a school roll”, which is available on the Thurrock Council Website and can be located at the following link:

https://www.thurrock.gov.uk/sites/default/files/assets/documents/children_missing_education_201601.pdf

We would draw your attention to the flowchart in Appendix A on Page 45 of the document.

As a school we also discuss any student whom we may be concerned about as ‘Missing in Education’ to Mr Frank Holohan at Thurrock Education Welfare Service (01375 652652).

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

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

Child criminal exploitation

Child criminal exploitation (CCE) is a form of abuse where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into criminal activity, in exchange for something the victim needs or wants, and/or for the financial or other advantage of the perpetrator or facilitator, and/or through violence or the threat of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. It does not always involve physical contact and can happen online. For example, young people may be forced to work in cannabis factories, coerced into moving drugs or money across the country (county lines), forced to shoplift or pickpocket, or to threaten other young people.

Indicators of CCE can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Suffering from changes in emotional wellbeing
- Misusing drugs and alcohol
- Going missing for periods of time or regularly coming home late
- Regularly missing school or education
- Not taking part in education

If a member of staff suspects CCE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Safeguarding incidents and/or behaviours can be associated with factors outside the school and can occur between children outside the school. All staff, but especially the designated safeguarding lead (and deputies), should be considering the context within which such incidents occur. This is known as contextual safeguarding which means assessments of children should consider whether wider environmental factors are present in a child's life that are a threat to their safety.

Extra familial harms can include: sexual exploitation, criminal exploitation and serious youth violence.

Gangs/Criminal Networks

Thurrock has at least one local gang/criminal network. It is important that staff and parents know the signs and can access appropriate support if they feel their daughter is involved or at risk of becoming involved with gangs.

The Home Office define a gang as being a relatively durable, predominantly street-based group of young people who:

- see themselves (and are seen by others) as a discernible group
- engage in criminal activity and violence and may also
- lay claim over territory (not necessarily geographical, but can include an illegal economy territory)
- have some form of identifying structural feature; and/or
- be in conflict with other, similar groups.

The Children's Commission provides the following information:

Being part of a friendship group is a normal part of growing up and it can be common for groups of children and young people to gather in public places to socialise. Belonging to such a group can form a positive and normal part of young people's growth and development. These groups should be distinguished from 'street gangs' for whom crime and violence are a core part of their identity. Although some group gatherings can lead to increased anti-social behaviour and youth offending, these activities should not be confused with the serious violence of gangs.

Child Criminal Exploitation begins with a grooming process with young people enticed by free drugs or cash. This can develop into the promise of more money or rewards if they do something in return, e.g. taking a parcel or packet to a specific address, selling cannabis or holding weapons. Girls are just as likely as boys to be enticed into gang affiliation – often girls are targeted to carry drugs or weapons as gang members know they are less likely to be stopped by the Police and searched. There is also the risk of sexual exploitation for girls who are gang affiliated.

Vulnerable young people, adults or those with learning difficulties can also be groomed. Gang members may take over their living accommodation as a base. This is known as 'cuckooing'. Vulnerable young people are at risk and can be coerced into behaviour they don't want to be part of.

If you are concerned about gang related activity call Essex Police on 101 or Crimestoppers anonymously on 0800 555 111. For more information, please follow this link: www.thurrock.gov/gangs-and-gang-crime/gangs-in-thurrock.

County Lines

County Lines is a tactic where gangs/criminal networks in cities introduce untraceable phones to a different area to sell drugs at street level. Local runners, often teenagers, are used to transport the drugs – boys and girls. They might also be used to transport weapons or act as 'spotters' looking out for the Police while others carry out drug deals.

Gangs establish contact with children at a young age, grooming them by giving gifts, attention, but also threats of violence. Disadvantaged children are targeted, but children from stable backgrounds have also been exploited.

The reality is that a number of gang members have at some point been missing children. Please see the earlier section on Children Missing Education, and appendix showing flow chart of CME action.

If you have any concerns about any pupil in relation to Gangs in Thurrock/County Lines please contact Dawn Collis, Katie Wells or Liz Bishop. The National Crime Agency provides useful information and advice. Go to National Crime Agency: County Lines. It is essential that we remain vigilant and well informed about the context that we are working in when it comes to safeguarding our pupils.

For further details and useful contacts please see 'Gang Related Violence in Thurrock' booklet displayed on Safeguarding Noticeboard in the Staffroom.

Behaviours

The behaviour of young people can change when they become involved with a gang. At home, withdrawing from family, pushing boundaries and having increased amounts of cash or material goods. At school, pupils can show a lack of respect, truant, have expensive items of clothing, jewellery, are picked up or dropped off by unknown people. With professionals, CP Team, Social Workers, Youth Offending Service, young people can be withdrawn, secretive, show association with other gang members, be taken to appointments by unknown people, and carry weapons or items that can be used as weapons. This is not an exhaustive list, please refer to the Gang Related Violence in Thurrock booklet for further information.

Knife Crime

Knife crime offences accounted for 14% of all offences committed by children and young people from Thurrock in 2017-18; this is higher than the National figure. Schools have a responsibility to work with wider agencies to address the issue of knife crime through education and offering support through Youth Offending Service, EWMHS and Drug and Alcohol Services.

There is no Home Office definition of 'knife crime'. The phrase was adopted by the media and is now popularly used to refer primarily to stabbings but also to the illegal carrying of knives by young people in a public place or on school premises. However, 'knife-enabled crime' includes a variety of other offences involving a bladed weapon, for example it is an offence to cause or threaten harm with a knife and if used in a robbery or assault, it aggravates the offence. It is also illegal to look after, hide or transport a dangerous weapon on behalf of someone else, market a knife in a way which is likely to encourage violent behaviour, and sell a knife to a person under 18.

At the Thurrock Youth Conference, December 2018, young people ranked 'put an end to knife crime' as their top priority.

Knife crime/serious youth violence is a problem which cannot be tackled without agencies and schools working together.

All school staff must understand the law on knife carrying and knife offences generally so we can provide a consistent approach.

At Grays Convent prohibited items include:

- Unlawful knives/weapons
- Illegal drugs
- Stolen items
- Fireworks
- Materials linked to radicalisation/extremism under the Prevent agenda
- Any article that the member of staff suspects has been or is likely to:
    - commit an offence or
    - to cause damage to the property of any person (including the pupil) should be referred to the Police for guidance.

The following items may identify a concern for welfare:

- Alcohol
- Tobacco, cigarettes, cigarette papers
- Pornographic images

If such items are found, an investigation will be undertaken, appropriate referrals made and support provided for pupils and their families.

Searching

The Headteacher, and staff authorised by her, have a statutory power to search pupils or their possessions, without consent where there are reasonable grounds for suspecting that the pupil may have a prohibited item. The Headteacher and authorised staff can also search for any item banned by the school rules which has been identified in the rules as an item which may be searched for.

The person conducting the search must be the same sex as the pupil being searched.

Following reports of Child Q's intimate search by police in Hackney 2020, we will ensure that if such action is recommended by police on school premises we would contact parents/carers and provide an appropriate adult.

Confiscation

School staff can seize any prohibited item found as a result of a search. They can also seize any item they consider harmful or detrimental to school discipline.

Screening

What the law allows:

- The school can require pupils to undergo screening by a walk-through or hand-held metal detector (arch or wand) even if we do not suspect them of having a weapon and without the consent of the pupils.
- The schools' statutory power to make rules on pupil behaviour and our duty as an employer to manage the safety of staff, pupils and visitors enables us to impose a requirement that pupils undergo screening.
- Any member of school staff can screen pupils.

Also note:

- If a pupil refuses to be screened, the school may refuse to have the pupil on the premises. Health and safety legislation requires a school to be managed in a way which does not expose pupils or staff to risks to their health and safety and this would include making reasonable rules as a condition of admittance.

- If a pupil fails to comply, and the school does not let the pupil in, the school has not excluded the pupil and the pupil's absence should be treated as unauthorised. The pupil should comply with the rules and attend.
- This type of screening, without physical contact, is not subject to the same conditions as apply to the powers to search without consent.

Reporting

In the event of any unlawful prohibited item being found, Essex Police and Thurrock Council will be informed.

Child sexual exploitation

Child sexual exploitation (CSE) is a form of child sexual abuse where 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 and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

The abuse can be perpetrated by males or females, and children or adults. It can be a one-off occurrence or a series of incidents over time, and range from opportunistic to complex organised abuse.

The victim can be exploited even when the activity appears to be consensual. Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

CSE can include both physical contact (penetrative and non-penetrative acts) and non-contact sexual activity. It can also happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam. CSE may also occur without the victim's immediate knowledge, for example through others copying videos or images.

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

If a member of staff suspects CSE, they will discuss this with the DSL. The DSL will trigger the local safeguarding procedures, including a referral to the local authority's children's social care team and the police, if appropriate.

Community safety incidents

Community safety incidents are situations such as unknown adults loitering near school or trying to talk to children. Please report this to the DSL or Deputy DSL immediately and the matter will be reported to the police and local authority to inform other schools.

Domestic abuse

Children who witness domestic violence are victims and can be adversely affected by any violence at home where it occurs between family members. In some cases, a child may blame themselves for the abuse or may have had to leave the family home as a result.

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. The abuse can be physical, sexual, financial, psychological or emotional.

Older children may also experience domestic abuse and/or sexual harassment violence in their own personal relationships.

Domestic abuse also covers harm which isn't physical as well as witnessing the ill-treatment of others, for example the impact of all forms of domestic abuse on children.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some cases children who have witnessed domestic abuse can be perpetrators in their relationships too.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) as part of Operation Encompass before the child or children arrive at school the following day.

The DSL will provide support according to the child's needs and update records about their circumstances.

Homelessness

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

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

Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

Private fostering

A private fostering arrangement is one that is made privately (without the involvement of a local authority) for the care of a child under the age of 16 years (under 18, if disabled) by someone other than a parent or close relative, in their own home, with the intention that it should last for 28 days or more. (*Close family relative is defined as a 'grandparent, brother, sister, uncle or aunt' and includes half-siblings and step-parents; it does not include great-aunts or uncles, great grandparents or cousins.)

Most frequently, young people are in private foster care for the following reasons:

- children from other countries sent to live in the UK with extended family
- host families for language schools
- parental ill-health
- where parents who have moved away, but the child stays behind (eg to stay at the same school to finish exams)
- teenagers estranged from their families

The Ofsted report into Private Fostering also refers to these reasons:

- children brought from outside the UK with a view to adoption
- children at independent boarding schools who do not return home for holidays and are placed with host families
- trafficked children

The Duty to refer to the Local Authority

Each party involved in the private fostering arrangement has a legal duty to inform the relevant local authority at least six weeks before the arrangement is due to start. Not to do so is a criminal offence.

Once the notification has been made to the authority, Children's Services have a duty to visit and speak to the child, the parent and the foster carer; and everyone in the foster carer's household. Children's services will then undertake a range of suitability checks including DBS checks on everyone in the household over the age of 16.

Other professionals, for example GPs surgeries and schools, also have a responsibility to report to the local authority where they are aware or suspect that a child is subject to a private fostering arrangement (see 'Replacement Children Act 1989 Guidance on Private Fostering 2005 paragraph 2.6).

Note that although schools have a duty to inform the local authority, there is no duty for anyone, including the private foster carer or social workers to inform the school. However, it should be clear who has parental responsibility.

The local authority must visit each privately fostered child at least every six weeks in the first year of the arrangement; and at least every twelve weeks in the second and subsequent year. In some areas schools are visited as part of this process to discuss the child with teachers.

The private foster carer has a duty to inform the local authority of any substantive changes to the arrangement or within the household.

There is no duty for schools to be given information about a child who is privately fostered by the family, carer or the local authority. There is however a duty on schools to inform children's services where they become aware of such an arrangement

So-called 'honour-based' abuse (including FGM and forced marriage)

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out

- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society
    - Confiding to a professional that she is to have a “special procedure” or to attend a special occasion to “become a woman”
    - Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents/carers stating that they or a relative will take the girl out of the country for a prolonged period
    - Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
    - Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
    - Being unexpectedly absent from school
    - Having sections missing from her ‘red book’ (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

Forced marriage

Forcing a person into marriage is a crime. Since February 2023 it has been a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th birthday. This applies to non-binding unofficial marriage as well as legal marriages. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

Preventing radicalisation

- **Radicalisation** refers to the process by which a person comes to support terrorism and extremist ideologies associated with terrorist groups
- **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
- **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 of terrorism 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.

Schools have a duty to prevent children from being drawn into terrorism or any kind of extremism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

We will assess the risk of children in our school being drawn into terrorism. This assessment will be based on an understanding of the potential risk in our local area, in collaboration with our local safeguarding partners and local police force.

We will ensure that suitable internet filtering is in place, and equip our pupils to stay safe online at school and at home.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.

Staff will be alert to changes in pupils' behaviour.

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

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

Children who susceptible to extremist ideology and radicalisation may have low self-esteem, or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

Staff should **always** take action if they are worried.

Child-on-child abuse

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

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

- Bullying (including cyber-bullying, 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 youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

Where children abuse their peers online, this can take the form of, for example, abusive, harassing, and misogynistic messages; the non-consensual sharing of indecent images, especially around chat groups; and the sharing of abusive images and pornography, to those who don't want to receive such content.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Child-on-Child Sexual violence and sexual harassment (see Appendix 12)

Harmful sexual behaviour can occur:

- Between 2 children of any age and sex, both the ages and stages of development of the children are critical factors
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally) and can occur simultaneously between the two

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

If a victim reports an incident, it is essential that staff make sure they 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.

Some groups are potentially more at risk. Evidence shows that girls, children with SEN and/or disabilities, and lesbian, gay, bisexual and transgender (LGBT) children are at greater risk.

Children displaying harmful sexual behaviour (HSB) have often experienced their own abuse and trauma and must be offered appropriate support.

Staff should be aware of the importance of:

- Challenging inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up. Failure to do this can lead to a culture that normalises abuse
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them
- Recognising that even if there are no reports it doesn't mean it is not happening

The DSL has received specific training on harmful sexual behaviour and the Deputy DSL, Pastoral Manager and Chair of Governors have received DSL training which addresses these issues. We work with Thurrock MASH, Childrens Services, Police and wider agencies to provide specialist support for pupils who have experienced harmful sexual behaviour. See Appendix 11 for contact details of SERICC and SARC.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.

Serious violence

Indicators which may signal that a child is at risk from, or involved with, serious violent crime may include:

- Increased absence from school
- Change in friendships or relationships with older individuals or groups
- Significant decline in performance
- Signs of self-harm or a significant change in wellbeing
- Signs of assault or unexplained injuries
- Unexplained gifts or new possessions (this could indicate that the child has been approached by, or is involved with, individuals associated with criminal networks or gangs and may be at risk of criminal exploitation (see above))

Risk factors which increase the likelihood of involvement in serious violence include:

- Being male
- Having been frequently absent or permanently excluded from school
- Having experienced child maltreatment
- Having been involved in offending, such as theft or robbery

Staff will be aware of these indicators and risk factors. If a member of staff has a concern about a pupil being involved in, or at risk of, serious violence, they will report this to the DSL.

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings in a safe place during their visit.

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

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

Visitors to the school who are visiting for a professional purpose, such as educational psychologists and school improvement officers, will be asked to show photo ID and:

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate

checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

Where a body or agency is providing services or activities for pupils, appropriate safeguarding policies and procedures will be checked. This applies to pupils regardless of whether they are on our school roll or another school's roll.

Non-collection of children

If a child is not collected at the end of the session/day, we will contact parents/carers and all other named contacts on our system. We will call the MASH team in the event of not being able to make contact with parents/carers or another appropriate adult.

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, we will contact the police and the MASH team and we will inform parents/carers.

Appendix 5: Grays Convent High School Code of Conduct Policy

Please see Grays Convent High School Staff Code of Conduct Policy on the school website:

https://static1.squarespace.com/static/5d1a13cccf0914000188611b/t/60cc63d2a37417307c3640fb/1624007635902/Code+of+Conduct+Policy+-+Autumn+2019+%2804.11.19%29.pdf

Appendix 6: Whistleblowing Policy

[Public Interest Disclosure Act 1998]

1. Introduction

1.1 The Public Interest Disclosure Act 1998 ("the Act") protects workers and employees from detrimental treatment or dismissal as a consequence of disclosing information about unlawful actions of their employer or information about the conduct or behaviour of employees, volunteers or others associated with the operation and organisation of the school. This is known as "whistleblowing". The protection applies to employees, volunteers, agency and contract workers. The school is committed to creating an open and supportive environment where individuals feel able to make a disclosure and feel confident in the process that will be followed. This policy sets out how disclosures can be made and how they will be handled. All disclosures will be treated consistently and fairly.

Employees who have a role involving finance should also have regard to the Financial Regulations document for their school which includes a Whistleblowing Policy containing specific provisions relating to financial issues.

1.2 If an employee/worker makes a disclosure it must concern one of the 6 types of "qualifying disclosure" specified in the Act to be protected. These are where there has been or is likely to be:

- a breach of any legal obligation;
- a miscarriage of justice;
- a criminal offence;
- a danger to the Health and Safety of any individual;
- damage to the environment; and,
- deliberate concealment of information about any of the above

The employee/worker raising the concern must reasonably believe they are doing so in the public interest. This means that personal grievances and complaints are not usually covered by this policy and should be dealt with under the Grievance Procedure.

1.3 Concerns should normally be raised initially with the employee's line manager. If a concern is raised verbally it should be followed up in writing wherever possible. However, where the complaint relates to the employee/worker's line manager, the complaint should be brought to the attention of a more senior manager, the Headteacher or the Chair of Governors.

2. Raising concerns

2.1 Where having raised a concern informally and the employee/worker has a genuine belief that the School has failed to take appropriate action or the employee/worker considers the informal process is inappropriate and wishes to raise the matter formally, they may report their concern to the Chair of Governors or in exceptional circumstances to the Local Authority or to a prescribed body. (A prescribed body is an organisation, normally with some regulatory function (for example the Health and Safety Executive), which is prescribed by the Secretary of State for the purposes of the Act who an individual may make a protected disclosure to. Any such disclosure to a prescribed body will qualify for protection under the Act. A list of prescribed bodies is available at the following link:

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/360648/bis-14-1077-blowing-the-whistle-to-a-prescribed-person-the-prescribed-persons-list-v4.pdf

2.2 Where the complaint is serious, for example involving fraud, theft or other potential gross misconduct, employees/workers should act quickly to report it but should not mention it to the subject of the complainant or other colleagues as that could prejudice any investigatory process.

2.3 It may be the case that employees/workers will have very genuine and justified suspicions of wrong-doing even though at the time of reporting they cannot point to concrete evidence. That should not deter employees/workers from going ahead and reporting the matter, particularly where it may involve potential risk to vulnerable people.

2.4 If the concern/complaint relates to the safeguarding of children (including concerns about other colleagues/works) and the employee/worker considers the informal process is inappropriate and/or wishes to raise the matter formally, they may report their concern to the to the Chair of Governors or they should contact their Local Authority Designated Officer (LADO).

3. Action by recipients of disclosures

3.1 It would be inappropriate to have hard or fast rules and judgement must be exercised. While it is essential for problems to be tackled effectively and with the aim of righting wrongs, this may well be best achieved in many less serious cases by discussion with the 'offending' employee/worker and securing a commitment as to future standards and corrective action. In other more serious cases the matter may need to be passed to a more senior level of management or directly to the Governing Body, as appropriate.

Once a disclosure has been made, the line manager/Governor responsible for handling the grievance may ask the whistle-blower to attend a meeting to gather all the information needed to ensure a clear understanding of the situation. Where a meeting is held, the whistle-blower may be accompanied by a trade union representative or work colleague if they wish and where possible the dates/times will be agreed to facilitate this.

Requests to be accompanied must be clearly communicated to the school allowing adequate time for the school to deal with the companion's attendance at the meeting. The request should be made in advance of the meeting providing the name of the companion and whether they are a fellow worker or trade union official or representative.

3.2 Where complaints are received from members of the public, the school's formal complaints procedure (as contained in the school Customer Care Code of Practice) must be followed, unless the complaint relates to the specific conduct or performance of an individual employee/worker in which case the Disciplinary Procedure may need to be instigated.

3.3 Any written complaint/allegation should be given a written acknowledgement and confirmation that the matter will be looked into. Unless clearly made in a very low key way about minor matters, verbal complaints/allegations should receive a written acknowledgement in the same way.

3.4 In the event of the allegation being of a very serious nature, for example relating to a fraud or other potential gross misconduct offence, there may well be a need to involve the school's auditors and/or the police. This should normally be agreed initially by the Chair of Governors who should, in turn, and where appropriate, keep the Local Authority informed in view of any possible implications concerning public monies. Advice may be sought from the school's legal advisers before involving the police in any such internal complaint or allegation.

3.5 When any complaint or allegation has been looked into and resolved or dealt with, the person who raised the matter in the first instance should be notified of that, normally in writing unless common-sense indicates that it can be done more appropriately in a verbal, informal way. How much detail to give of findings and outcomes is a matter of judgement and it would, for example, be inappropriate to disclose details of disciplinary actions taken against another employee.

3.6 All disclosures will be handled by the school in a timely manner. The timescales for handling disclosures will differ depending on the nature of the disclosure made but all disclosures (whether formal or informal) will be acknowledged by the school within [2] working days. The timescales for any further steps in the process will be notified to the whistle-blower when the disclosure is acknowledged.

4. Protecting 'whistle-blowers' and complainants

4.1 Whistle-blowers are protected by the Act from suffering a detriment or dismissal as a result of making a protected disclosure which they reasonably believe is in the public interest.

A 'whistleblower' may ask for their identity to be kept concealed. Frequently the answer will be yes, but in more serious cases where disciplinary action may have to be taken against others they may well have a right to know the source as well as the nature of such complaints. In any case the school is committed to doing as much as possible to ensure that well-being at work does not suffer as a result of the tensions that may result from the making or investigation of complaints.

Where a whistleblower remains anonymous the school will not ordinarily be able to provide feedback to the whistleblower and any action taken as a result of an anonymous disclosure may be limited. The school will take all appropriate steps to investigate such a disclosure in line with the level of information provided. If an anonymous whistleblower wishes to seek feedback from the school an appropriate anonymised email address should be provided.

4.2 If an individual believes they are experiencing harassment or victimisation at work as a consequence of 'whistleblowing' they are strongly encouraged to bring this to an appropriate senior manager's attention at an early stage so that it can be addressed. The school will take all reasonable steps to prevent/address such harassment or victimisation.

4.3 Whether or not work relationships suffer in this way it may well be that 'whistle-blowers' will find the process of reporting wrong-doing and making statements etc. stressful, particularly where there may be feelings of divided loyalties. In such circumstances the 'whistleblower' may welcome the opportunity to talk through these anxieties and feelings either with their manager, or possibly, with someone from a counselling service. This is to be encouraged.

5. What if an employee receives a complaint about him/herself?

5.1 If the complaint or allegation is at all significant or made in a formal way, particularly by a member of the public or other external users, then employees/workers should inform their line manager or Chair of Governors in the case of Head teachers – even if they believe or know the complaint to be groundless or unjustified.

5.2 Where a complaint or 'grumble' clearly does not justify taking up the line in this way, making a brief note on a file or diary or similar will often be advisable.

6. Malicious allegations

6.1 If, following appropriate investigation, it is considered that an employee has made a malicious allegation without real substance and/or which could not be reasonably considered to be in the public interest, this will be taken as a most serious matter and may potentially lead to disciplinary action in line with the school's disciplinary procedure.

6.2 Where other individuals engaged by the school make a malicious allegation, the school will investigate the allegation thoroughly and take appropriate action, which may include terminating the contract/arrangements with the individual.

Appendix 7: Safeguarding Information Poster

Appendix 8: Reporting a concern flowcharts

WHAT TO DO IF YOU ARE WORRIED ABOUT SOMEONE HURTING YOU IN SCHOOL OR AT HOME

A Flow Chart for Student Information

You are worried about your own well-being or the well-being of a friend

TELL YOUR FORM TUTOR

She / he will listen to your concerns and pass the information on to the Head of Year/ Key Stage

The Head of Year/ Key Stage will look at the concerns and will work with you to help you to resolve this

Where it is needed, the Head of Key Stage will share information with Mrs Collis – Designated Safeguarding Lead, Mrs Wells – Deputy Designated Safeguarding Lead or Mrs Bishop – Pastoral Manager

A MEMBER OF THE ABOVE CHILD PROTECTION TEAM WILL SPEAK TO YOU AND WORK WITH YOU TO RESOLVE THE ISSUE

WHAT TO DO

If You're Worried a Child is Being Abused

A Flow Chart for Referral

TEACHER HAS CONCERNS ABOUT A CHILD'S WELFARE

A PUPIL MAKES A DISCLOSURE

Teacher discusses with Designated Safeguarding Lead/CP Team and / or other members of SLT as they think appropriate

Listen carefully, record details of the disclosure. Do not prompt the pupil or ask leading questions.

Do not promise confidentiality and pass written details on to Designated Safeguarding Lead/CP Team

There are still concerns

There are no longer any concerns

Designated Safeguarding Lead/CP Team refers to Social Services, following up in writing within 48 hours

No further child protection action, although may need to act to ensure services provided

Social Worker and Manager acknowledge receipt of referral and decide on next course of action within one working day

Feedback to referrer on next course of action

No further Social Services involvement at this stage, although other action may be necessary e.g. onward referral

Initial assessment required

INITIAL ASSESSMENT COMPLETED WITHIN 7 WORKING DAYS FROM REFERRAL TO SOCIAL SERVICES

Concerns about child's immediate safety

DECISION MADE THAT EMERGENCY ACTION MAY BE NECESSARY TO SAFEGUARD A CHILD

WHAT TO DO IF AN ALLEGATION IS MADE ABOUT A MEMBER OF STAFF

A Flow Chart for Staff Information

All school staff should take care not to place themselves in vulnerable situations with a child. Interviews or 'One to one' sessions should be conducted in view of other adults.

All staff should be aware of the school's behaviour policy and guidance for safer working practices for adults who work with children and young people.

If a pupil makes an allegation against a member of staff, the member of staff receiving the allegation will immediately inform the Headteacher or the most senior teacher if the Headteacher is not present

The Headteacher/Senior teacher will discuss the content of the allegation with the Designated Safeguarding Lead.

If the allegation concerns the Headteacher, the person receiving the allegation will immediately inform the Chair of Governors who will consult the Local Authority Designated Officer for Child Protection (LADO) without notifying the Headteacher first.

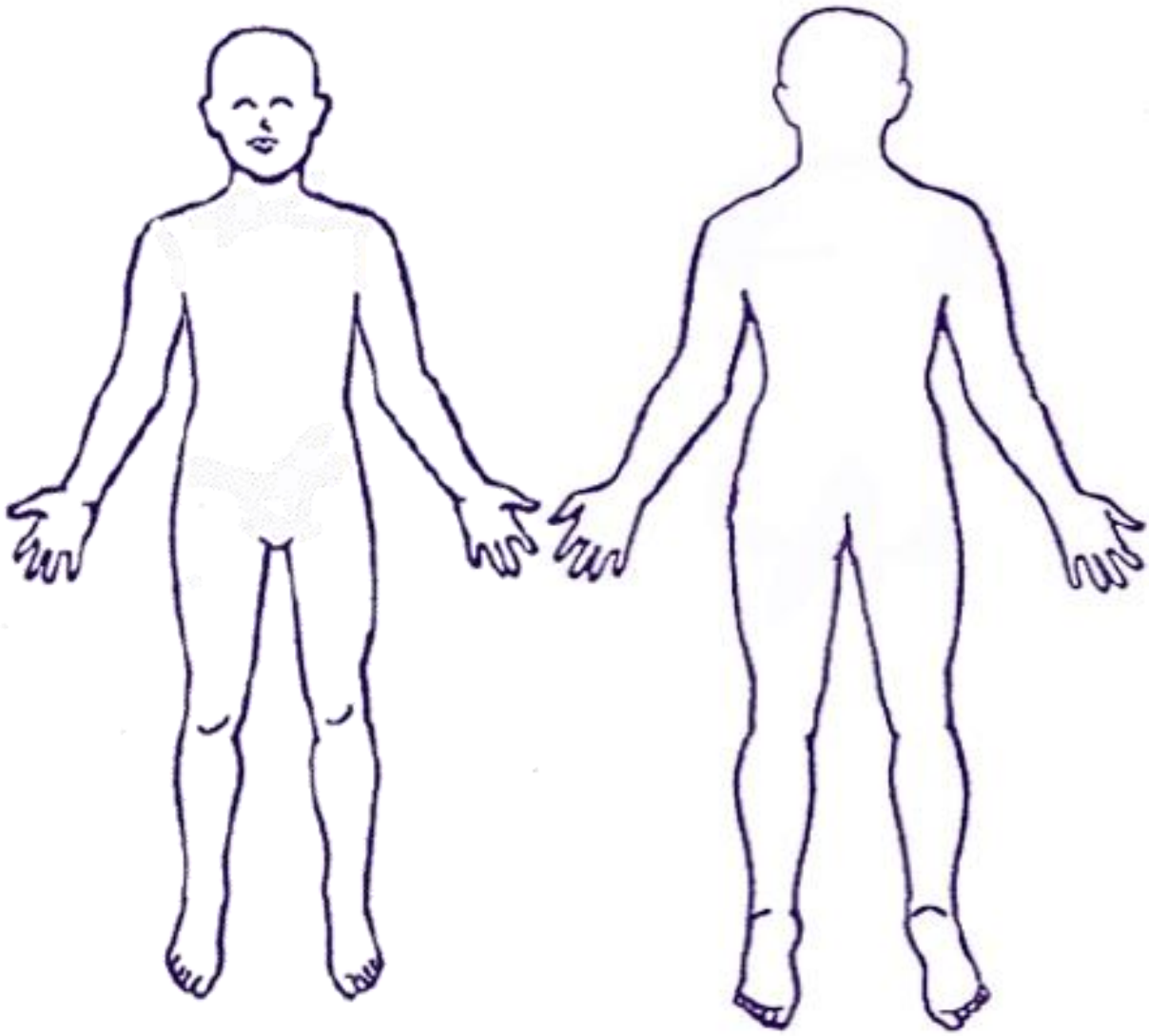
The school will follow the LA procedures for managing allegations against staff. Suspension of a member of staff against whom an allegation has been made needs careful consideration and we will consult the LADO in making this decision.

Appendix 9: Child Protection Record – Report of a Concern

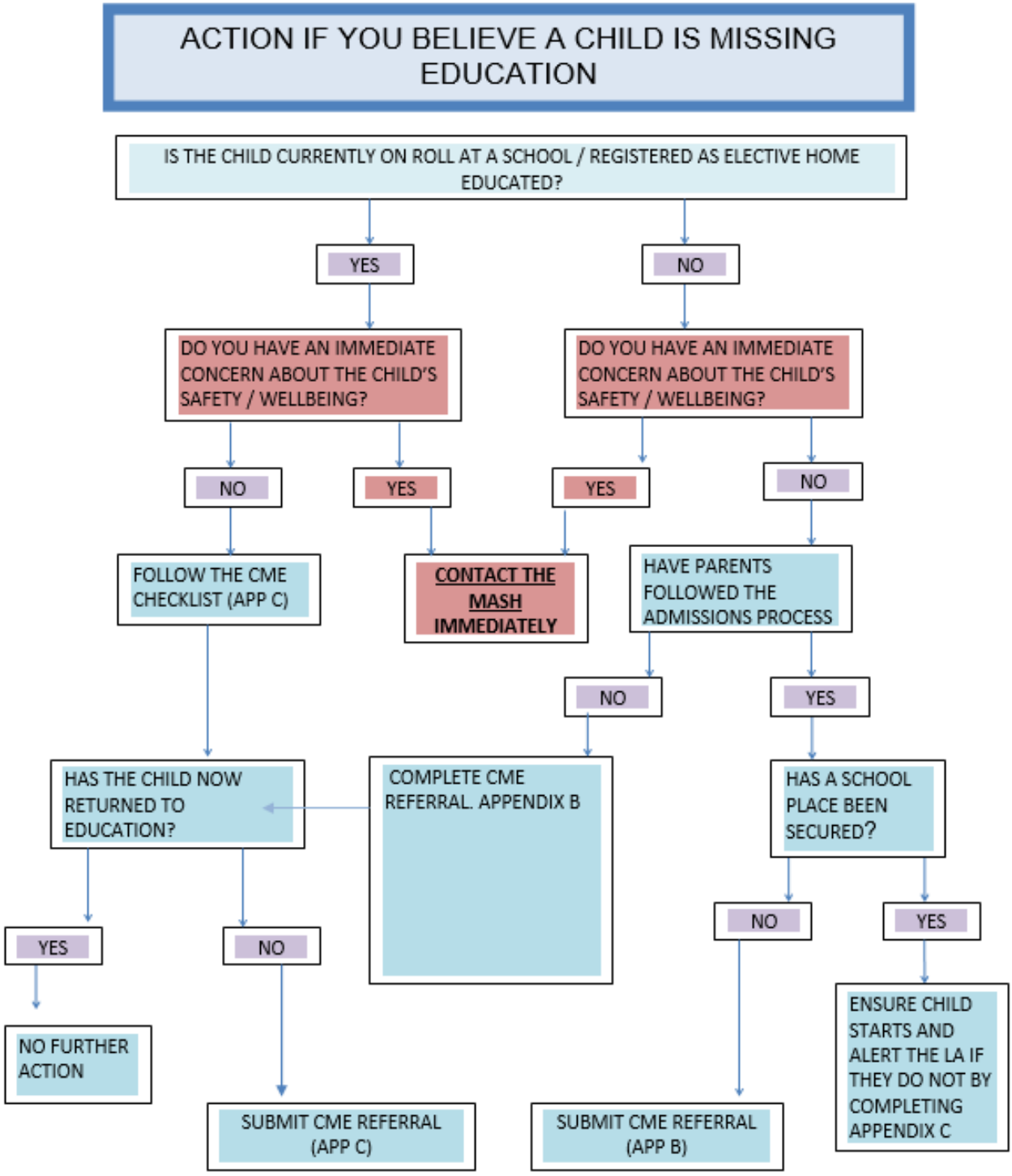
CHILD PROTECTION RECORD – Report of a Concern

Name of referrer			
Child name			
Date of Birth		Year Group	
Details of concerns			
Reported to:			
Current Status			
Signed:		Dated:	

Body Map



Appendix 10: Child Missing in Education flowchart



Appendix 11: Contacts for help, advice and support

Some people you can contact for help, advice and support are:

Your family doctor	
School Health Nurse/Health Visitor	
NSPCC	Website: www.nspcc.org.uk
Childline	Website: www.childline.org.uk
SERICC Specialist Service Supporting Victims of Sexual Violence/Abuse	
SARC Sexual Assault Referral Centre	http://www.oakwoodplace.org.uk/contact-us.html
SWGFL and The Marie Collins Foundation HSB Support Service	https://swgfl.org.uk/harmful-sexual-behaviour-support-service/
PACE Information on role of Appropriate Adult	https://www.gov.uk/government/publications/pace-code-c-2019
Right to Choose – Forced Marriage	https://www.gov.uk/guidance/forced-marriage
Young Minds Parents Information Service	Tel: 0808 802 5544
Papyrus HOPELineUK	Tel: 0800 068 4141
The Samaritans	Tel: 08457 90 90 90
MIND Information line	Tel: 0845 766 0163
Youth Access	Tel: 0151 666 4123
Open Door	Tel: 0151 639 4545
Response	Tel: 0151 666 4123
Gang-related violence and serious youth violence	gangs.thurrock@thurrock.cjsm.net

There is a wealth of information available to support schools, colleges and parents to keep children safe online. The following list is not exhaustive but should provide a useful starting point:

Organisation/Resource	What it does/provides
thinkuknow	NCA CEOPs advice on online safety
disrespectnobody	Home Office advice on healthy relationships, including sexting and pornography
UK safer internet centre	Contains a specialist helpline for UK schools and colleges
swgfl	Includes a template for setting out online safety policies
internet matters	Help for parents on how to keep their children safe online
parentzone	Help for parents on how to keep their children safe online
childnet cyberbullying	Guidance for schools on cyberbullying
pshe association	Guidance and useful teaching resources covering online safety issues including pornography and the sharing of sexual images

educateagainsthate	Practical advice for parents, teachers and governors on protecting children from extremism and radicalisation
The use of social media for online radicalisation	A briefing note for schools on how social media is used to encourage travel to Syria and Iraq
UKCIS	The UK Council for Internet Safety's website provides: • Sexting advice • Online safety: Questions for Governing Bodies • Education for a connected world framework
NSPCC	NSPCC advice for schools and colleges
net-aware	NSPCC advice for parents
commonsensemedia	Independent reviews, age ratings, & other information about all types of media for children and their parents
Searching screening and confiscation	Guidance to schools on searching children in schools and confiscating items such as mobile phones
lgfl	Advice and resources from the London Grid for Learning

Useful links

Grays Convent High School – Anti-racist Statement:

https://static1.squarespace.com/static/5d1a13cccf0914000188611b/t/621f4c81ed77c972e1108ffc/1646218370355/Grays+Convent+Anti+Racist+Statement+-+February+2022.pdf

Working Together to Safeguard Children – Last updated December 2023:

https://www.gov.uk/government/publications/working-together-to-safeguard-children--2

Keeping Children Safe in Education – Last updated September 2023

https://www.gov.uk/government/publications/keeping-children-safe-in-education--2

SET Procedures 2017 – Last updated October 2019

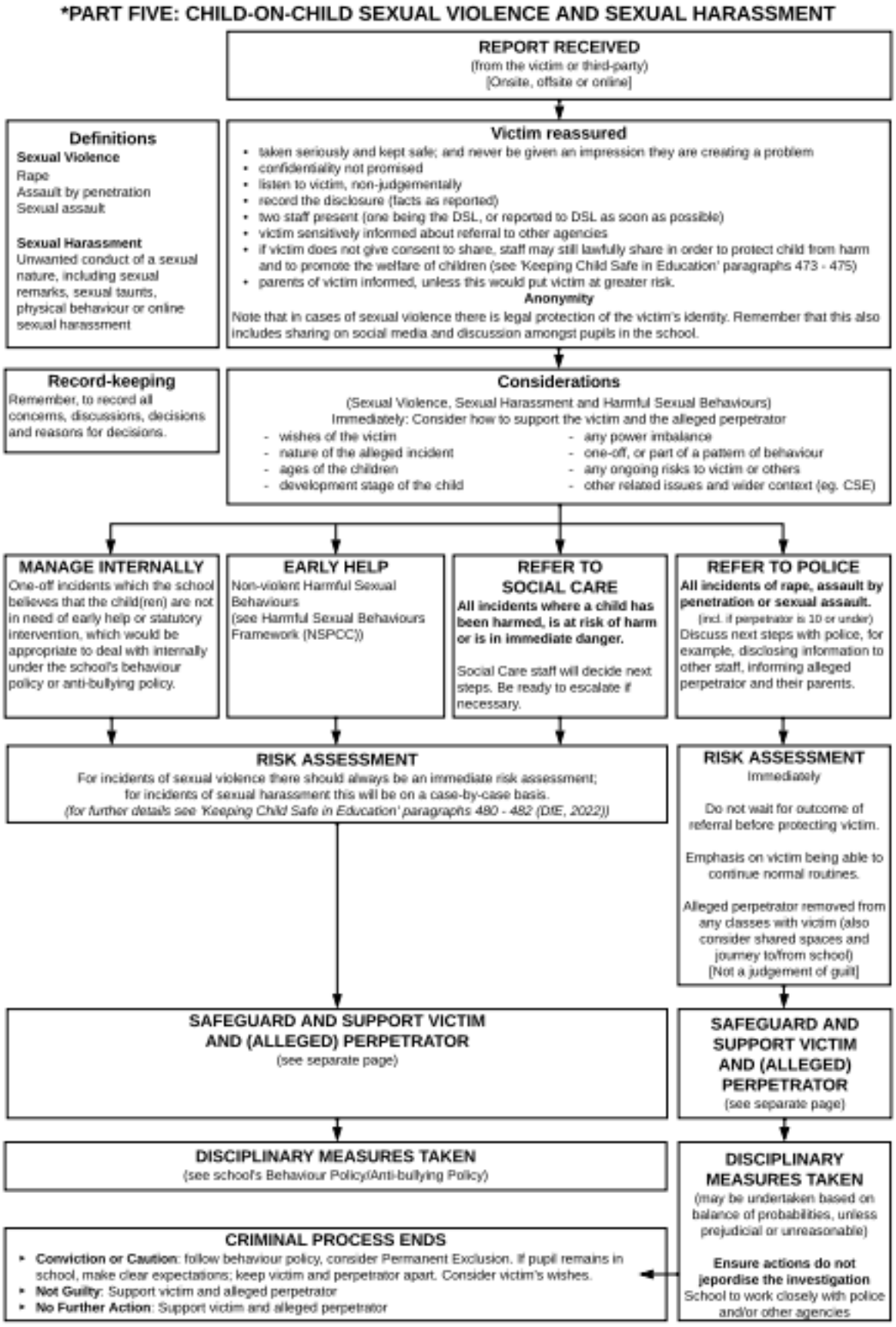
https://www.thurrock.gov.uk/sites/default/files/assets/documents/set_procedures_201910.pdf (copy and paste link into your browser for access)

Safer Working Practices May 2019

https://c-cluster-110.uploads.documents.cimpress.io/v1/uploads/13ecce28-e8f2-49e9-83c6-c29337cd8071~110/original?tenant=vbu-digital

(copy and paste link into your browser for access)

Appendix 12 Child-on-child sexual violence and sexual harassment flowchart



Appendix 13 Child-on-child sexual abuse: what to do if a child makes a disclosure

Child-on-child sexual abuse: what to do if a child makes a disclosure

Make sure you understand our child protection policy and procedures for dealing with peer-on-peer abuse, and follow these.

- ✔ Listen and reassure the child that they will be supported and kept safe
- ✔ Make a written record as soon as possible, stating only the facts
- ✔ Tell our designated safeguarding lead (DSL) urgently:
- ✔ Where appropriate, take action yourself:
  - If the child is in immediate danger or at risk of harm, make a referral to children's social care
  - If an offence has been committed, report it to the police (even if the alleged perpetrator is under 10 – the age of criminal responsibility)
  - Find out whether the victim and alleged perpetrator share classes, premises or transport, and consider how best to deal with this

- ✖ Dismiss the incident as 'banter', 'part of growing up' or 'having a laugh'
- ✖ Ask leading questions
- ✖ Promise total confidentiality – explain who you will need to tell and why
- ✖ View photos or videos of a sexual nature
  If you do so by accident or think you might need to in order to deal with the issue effectively, talk to our DSL
- ✖ Take notes while the child is talking, if at all possible
- ✖ Tell anyone about the disclosure unless they need to know in order to progress it

Key definitions

Child-on-child sexual abuse: when a child (anyone under the age of 18) commits an act of sexual violence or harassment against another child

Sexual violence: rape, assault by penetration, or sexual assault (intentional sexual touching)

Sexual harassment: unwanted conduct of a sexual nature – such as sexual comments, sexual jokes or taunting, physical behaviour like interfering with clothes, or online harassment such as sexting

Upskirting: taking a picture under a person's clothing without them knowing to obtain sexual gratification or cause the victim humiliation, distress or alarm

Sexual activity is an offence if:

- Person B (the victim) does not consent
- Person A (the perpetrator) does not reasonably believe that Person B consents

Someone consents if they:

- Agree by choice
- Have the freedom and capacity to choose