



# Hambling View Child Protection and Safeguarding Policy

A handwritten signature in blue ink, appearing to read 'Guy Hooper', is positioned to the right of the 'Signed by' text.

**Ratified by Chair of Govs.**

**Signed by .**

**Date**

**24<sup>th</sup> October 2024**

**Date**

09.09.2024

**Review Date**

09.09.2025

## Safeguarding children

Students should report any safeguarding concerns they may have or any child-on-child abuse concerns etc to a member of staff in their school. The member of staff must then log this information on CPOMs and if urgent, speak to the Designated Safeguarding Lead (DSL) immediately.

Victims of any abuse will always be taken seriously and should never feel ashamed about any incident they are reporting. Victim blaming will not be tolerated at Hambling View.

The term safeguarding covers a wide area which all staff should be aware of.

Including but not limited to:

- Attendance
- Ambulance
- Health and safety
- Complaints
- Anti-bullying
- Behaviour
- Physical intervention
- Medical conditions in school
- Drugs in School
- Educational visits
- Online abuse
- Intimate care
- Internet filtering/ICT
- CCTV
- Code of Conduct
- Recruitment & Selection
- Induction
- Whistleblowing
- Relationships and Sex Education (RSE)
- Mental health
- Data Protection and Data Breach

Hambling View will carry out its duty to safeguard students which is:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and/or physical health or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have optimum life chances so they can enter adulthood successfully.
- Educating children to enable them to live safely now and in the future.

Taking action to ensure the above aims are made and escalating concerns if the trust perceives other parties are not fulfilling their statutory obligations

Hambling View will implement this policy to provide a safe learning environment and ensure school staff have the skills and knowledge to take action when children need extra support from early help services or require a social work service because they are in need or need to be protected from harm. The school will operate with integrity in all its policies, procedures, and practices in relation to keeping children safe.

## Information, Operational Policies and Procedures

### Purpose of policy

This policy sets out how Hambling View intends to meet its statutory duty under the Department for Education's (DfE's) statutory guidance [Keeping Children Safe in Education](#) and [Working Together to Safeguard Children](#). This policy is also based on:

- [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
- [The Human Rights Act 1998](#), which explains that 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 individuals under the [European Convention on Human Rights](#) (ECHR)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their pupils with regard to these characteristics. The Act allows our school to take positive action to deal with particular disadvantages affecting pupils (where we can show it's proportionate). This includes making reasonable adjustments for disabled pupils. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment
- [The Public Sector Equality Duty \(PSED\)](#), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve pupil outcomes. Some pupils may be more at risk of harm from issues such as sexual violence; homophobic, biphobic or transphobic bullying; or racial discrimination

### **Roles and responsibilities:**

#### **Local Authority Children's Services**

- Bath and North East Somerset (BANES) is responsible for the following: Co-ordinating the delivery of integrated children's services within the Local Authority, including an early help service;
- Providing statutory social work services under the Children Act 1989 and the Children and Social Work Act 2017; Working Together; Keeping Children Safe in Education and all associated guidance and other relevant legal frameworks\*, and for sharing the fact that a child has a social worker;
- Dealing with allegations against members of staff (including support staff) and volunteers through the Local Authority Designated Officer (LADO);
- Taking responsibility for those children who are not in education, including children who are known to be home educated;

**Bath and North East Somerset Community Safety & Safeguarding Partnership –**  
<https://bcssp.bathnes.gov.uk/>

**Bristol Safeguarding** - <https://www.bristol.gov.uk/residents/social-care-and-health/children-and-families/concerns-about-a-child/first-response-for-professionals-working-with-children/make-a-referral-to-first-response>

**Gloucestershire Safeguarding** - <https://www.gloucestershire.gov.uk/gscp/>

**South Gloucestershire Safeguarding** -

<https://sites.southglos.gov.uk/safeguarding/category/children/i-am-a-professional/>

**North Somerset Safeguarding** – <https://nsscp.co.uk/>

**Somerset Safeguarding Children Partnership** - <https://somersetsafeguardingchildren.org.uk>

**Wiltshire Safeguarding** – <https://www.wiltshire.gov.uk/article/1436/Child-protection>

## **The Headteachers Responsibility**

The Headteacher will ensure that the school meets its statutory safeguarding duty by ensuring the following:

- Staff are inducted thoroughly and have read all the safeguarding and child protection policy, behaviour policies, national guidance, and the relevant Local Authority children missing from education policy so that they are fully aware of their role in safeguarding children and can fully implement policies.
- All staff can identify those children who need extra help and can make appropriate referrals to early help services.
- All staff are vigilant to harm and abuse, can identify those children for whom there are child protection concerns, and can make appropriate referrals to the relevant Local Authority Children's Services.
- Staff can work in partnership with other agencies to safeguard children, including providing early help support, contributing to assessments and the implementation of the child's plan, attending network meetings and case conferences, monitoring children's progress, and liaising with social workers.
- Safer recruitment practice is followed when recruiting to posts and appropriate action is taken whenever an allegation is made against a member of staff.
- The school offers a safe environment for staff and students to learn, and for children who may have concerns to report them.
- The school applies appropriate filtering and monitoring of IT and staff are appropriately trained so they understand their responsibility in this regard.
- The school curriculum details how children are educated to be safe and to recognise and stay safe from abuse including online.
- The school curriculum teaches students about British Values so that they are tolerant and call out prejudicial or harmful behaviours including – sexism, misogyny, homophobia and biphobia, sexual harassment, and abuse, etc.
- The school recognises the importance of contextual safeguarding, namely that child safeguarding incidents and/or behaviours can be associated with factors outside the school and/or can occur between children outside of these environments.
- Safeguarding issues are brought to the attention of the governing body.
- Low-level concerns are recorded appropriately.
- Make parents and carers aware of the content students will see online whilst working in school.

## **Role of the Designated Safeguarding Lead (DSL)**

The role of the Designated Safeguarding Lead and their deputy/deputies is to take lead responsibility for safeguarding and child protection within the school and to be available during school hours for staff to discuss safeguarding concerns.

The Designated Safeguarding Lead (and their deputy/deputies) will:

- Liaise with and manage referrals to relevant agencies such as the relevant Local Authority Children's Services, the LADO, the Channel Panel, the Police, and the Disclosure and Barring Service (DBS).
- Keep the Head Teacher and the governing body informed of ongoing safeguarding and child protection issues and inquiries.
- Provide advice and guidance for staff on safeguarding and child protection issues and making referrals.
- Ensure the local safeguarding and child protection procedures are up to date and consistent with Local Safeguarding Children Board policies and that local procedures are reviewed annually.
- Ensure all staff, including temporary staff, are aware of and understand policies and procedures and can implement them.
- Attend regular training (in line with BCSSP requirements), including Prevent Duty Awareness training, Child Protection Forums meetings hosted by the relevant Local Authority to keep up to date with new policies, emerging issues, and local early help, safeguarding and child protection procedures and working practices.
- Provide regular updates received from the relevant Local Authority and BCSSP to all staff members and governors on any changes in safeguarding or child protection legislation.
- Have an awareness of those children who may be vulnerable. All of our students have special educational needs/disabilities; therefore it is essential that the DSL liaise with the SENCo when considering any safeguarding action for a child with special needs.
- Liaise with the designated teacher for Children Looked After (CLA)/Care Experienced whenever there are safeguarding concerns relating to a Child Looked After (CLA) or those Children/Young People who have experienced care. .
- Oversee child protection systems within the school, including the management of records, standards of recording concerns, and referral processes.
- Ensure they understand fully and take responsibility for, filtering and monitoring systems and pass this information to the staff so that they too are aware.
- Provide a link between the school and other agencies, particularly the relevant Local Authority Children's Services and the relevant Local Authority Local Safeguarding Children Board.
- Ensure staff, including temporary staff, receive appropriate safeguarding and child protection training every 3 years and receive regular updates (eg: via email, e-bulletins, and staff meetings) as required, but at least annually.
- Ensure parents are fully aware of the policies and procedures and that they are kept informed and involved.
- Ensure relevant records are passed on appropriately when children transfer to other schools and where appropriate, share relevant information with schools or colleges to enable continued support to the child on transfer.
- Have a good awareness of students who need a social worker and may be at greater risk of harm and liaise with social workers regarding individuals when concerns arise.
- Liaise with pastoral staff and external agencies to provide mental health support to students to those identified as needing intervention.
- Hold and use information from Local Authorities so that decisions can be made in the best interest of the child's safety, welfare, and educational outcomes. This should be considered as a matter of routine.
- Encouraging staff to have a 'professional curiosity' where children may not be ready to disclose abuse, exploitation, or neglect.

### **Working with parents and carers**

Hambling View recognises the importance of working in partnership with parents and carers to ensure the welfare and safety of students. As such, we will:

- Make parents aware of the school's statutory role in safeguarding and promoting the welfare of students, including the duty to refer students where necessary, by making all school policies available on the school website or on request.
- Provide opportunities for parents and carers to discuss any problems with class teachers and other relevant staff.
- Consult with and involve parents and carers in the development of local procedures to ensure their views are considered.
- Ensure a robust complaints system is in place to deal with issues raised by parents and carers.
- Provide advice and signpost parents and carers to other services and resources where students need extra support.

### **Multi-agency working**

Hambling View is committed to working in partnership with relevant agencies in order to meet its obligations under Section 11 of the Children Act 2004, Working Together To Safeguard Children and Keeping Children Safe in Education.

The school recognises its vital role in safeguarding school-age children, and we will cooperate with the relevant Local Authority to ensure joint working with partner agencies to improve outcomes for children. Hambling View also recognises that all staff have a role to play in safeguarding children.

### **Safeguarding children**

Hambling View will carry out its duty to safeguard students which is:

- Protecting children from maltreatment.
- Preventing impairment of children's mental and/or physical health or development.
- Ensuring children are growing up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable children to have optimum life chances so they can enter adulthood successfully.
- Educating children to enable them to live safely now and in the future.
- Taking action to ensure the above aims are made and escalating concerns if the trust perceives other parties are not fulfilling their statutory obligations.

Schools will refer to the relevant Local Authority thresholds and eligibility criteria to help make decisions on the child's level of need and the appropriate service to refer to. Staff will consult with the DSL (Designated Safeguarding Lead) for advice and to discuss the case prior to making any referral for services.

Staff will also share information and work in an integrated way to ensure a coordinated response from agencies to support families and meet the child's needs.

### **Early Help Cases**

Staff will identify children who need extra help at an early stage and provide support to prevent concerns from escalating. Staff will be aware of the needs of the following groups of children whose circumstances may mean they will require early help:

- Children with disabilities and additional needs, including those with special educational needs.
- Young carers.
- Children showing early signs of being drawn into anti-social or criminal behaviour, including gangs and organised crime.
- Children who frequently go missing from home, school, or care.
- Children who are misusing drugs or alcohol.
- Children at risk of exploitation through modern slavery and trafficking.
- Children whose home circumstances are negatively affected by adult substance misuse or mental ill health or domestic abuse.
- Children who have returned home from care.
- Children who show early signs of abuse or neglect.
- Children at risk of radicalisation.
- Privately fostered children.
- Children who have had multiple suspensions or are at risk of permanent exclusion.
- Has a parent or carer in custody or is affected by parental offending

Where the child's extra needs require services, consideration will be given to what early help support can be offered to a child by the school.

If the child requires an early help service from another agency, the school will make a referral to the Early Help service for appropriate help and support. Staff will consult with parents before making any referral to discuss the matter and gain consent to refer the child.

Where the child is receiving an Early Help service, the school will work as part of the Team Around The Child and take up the role of lead professional where this is appropriate.

Early Help provision should be monitored and reviewed to ensure outcomes for the child are improving. If the school believes that this is not the case, consideration should be given to making a referral for a statutory social work service.

### **Request for Service (Referral) for a statutory social work service**

Where there are concerns about a child's welfare, staff will act immediately by seeking the advice of the DSL or their deputy who are most likely to have the most complete safeguarding overview. Following consultation, the DSL should decide on whether to make a request for service to the relevant Local Authority Children's Services.

Where the risks identified do not meet the threshold for a strategy meeting but there is concern that a section 17, Child In Need, an assessment might not be the right course of action, the concern is passed on to the relevant Local Authority to gather relevant information from other agencies to make the recommendation of which route to pursue.

The relevant Local Authority should inform the school within 24 hours of the outcome of any referral and what action the relevant Local Authority Children's Services will be taking. This may include any of the following:

- Carrying out a single assessment to identify the child's needs and establish if the child is a Child In Need under section 17 of the Children Act 1989. These are children (including disabled children) who are unlikely to meet a reasonable standard of health and development unless provided with services.
- Convening a strategy meeting under child protection procedures as set out in section 4 for any child where there are concerns about significant harm and/or taking any immediate action to protect the child.

- Providing services for the child and their family in the meantime whilst work is on-going (including details of services).

## **Child Protection Procedures**

Hambling View will work to the following policy documents to support the protection of students who are at risk of significant harm.

- Working together to safeguard children  
[https://www.gov.uk/government/publications/working-together-to-safeguard-children--2/What to do if you're worried a child is being abused \(DfE2015\)](https://www.gov.uk/government/publications/working-together-to-safeguard-children--2/What%20to%20do%20if%20you're%20worried%20a%20child%20is%20being%20abused%20(DfE2015))
  - The Southwest Safeguarding Children Board Child Protection Procedures  
<https://www.proceduresonline.com/swcpp/>
  - Keeping children safe in education (2024)(DFE)  
<https://www.gov.uk/government/publications/keeping-children-safe-in-education--2>
- Mental Health and Behaviour in Schools  
<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>
- Teaching online safety in schools  
<https://www.gov.uk/government/publications/teaching-online-safety-in-schools>

In line with these policies and procedures, we will:

- Identify those students where there are child protection concerns and make a referral to the relevant Local Authority Children's Services.
- Attend Child Protection Case Conferences to effectively share information about risk and harm.
- Contribute to the development and monitoring of Child Protection Plans as a member of the core group (for children who are not deemed to be at risk but who have a Child In Need Plan, the school will contribute to the development and monitoring of that plan).
- Carry out the school's role in implementing the Child Protection Plan continually monitoring the child's wellbeing and liaising with the allocated social worker as required.

## **Recognition**

Hambling View staff have a responsibility to identify those children who are suffering from abuse or neglect and to ensure that any concerns about the welfare of a student are reported to the DSL. The DSL will ensure staff are aware of the definitions of significant harm and specific indicators that a student may be suffering significant harm.

Any concerns held by staff should be discussed in the first instance with the DSL or their deputy and advice sought on what action should be taken. Where required, advice on thresholds and indicators of harm can be obtained from the duty social worker on a no-names basis.

## **Dealing with disclosures**

If a student discloses to a member of staff that they are being abused, the member of staff should:



- Listen to what is said without displaying shock or disbelief and accept what the child is saying.
- Allow the child to talk freely.
- Reassure the child but do not make promises that it may not be possible to keep, or promise confidentiality, as a referral may have to be made to the relevant Local Authority Children's Services.
- Reassure the child that what has happened is not their fault and that they were right to tell someone.
- Do not ask direct questions but allow the child to tell their story.
- Do not interrogate the child or ask leading questions. Clarify, if necessary, what has been said to you so that you are clear. Use his/her words (Give the option to write if appropriate).
- Not criticise the alleged perpetrator.
- Explain what will happen next and who must be told.
- Make a formal record and pass this on to the DSL.
- Make notes and then write them up. (Include date and time and describe any observable behaviour).
- Local procedures should be followed for recording disclosure e.g. CPOMS incident logs etc.

### **Request for Service (Referral)**

Where possible, a decision on whether to refer a student to the relevant Local Authority Children's Services should be made by the DSL or their deputy, following a discussion with the member of staff who has raised concerns. However, this should not delay any referral, and any member of staff may make a referral if this is necessary. Staff must discuss the matter with a member of the senior management team and take advice from the Duty social worker. The DSL should be informed as soon as possible.

Referrals should be in writing using the relevant paperwork completed either by the teacher raising concerns or by the DSL. Urgent child protection referrals will be accepted by telephone but must be confirmed in writing immediately via the correct form. Referrals for disabled children can also be made using the relevant form or directly to Disabled Children's Services.

Where there is any doubt about whether the concerns raised meet the thresholds for a Child Protection referral, The DSL may discuss the case on a "no names" basis with the Duty social worker to obtain advice on how to proceed.

Parental consent must be sought prior to the request for service being made unless seeking consent would place the child at risk of further harm, interfere with a criminal investigation or cause undue delay. If parents do not consent, but the child is at risk of significant harm, the referral should still be made.

All referrals should be acknowledged by the Children and Families Duty and Assessment Team within 24 hours and the referrer informed of what action will be taken.

If the school does not think the child's situation is improving within a reasonable timescale following referral, this should be taken up with the relevant Local Authority Children Services.

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

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

## **Attendance At Case Conferences and Core Groups**

The DSL will liaise with the relevant Local Authority Children's Services to ensure that all relevant information held by the school is provided to the relevant Local Authority Children's Services during the course of any child protection investigation.

The DSL will ensure that the school is represented at Child Protection Case Conferences and Core Group meetings:

- A member of staff who knows the child well, such as the SENDCO, a class teacher, or tutor will be nominated to attend.
- If no one from the school can attend, the DSL will ensure that a report is made available to the conference or meeting.

## **Monitoring**

Where a student has a child protection plan in place and the school has been asked to monitor their attendance and welfare as part of this plan:

- Monitoring will be carried out by the relevant staff member in conjunction with the DSL and this will be shared in preparation for the conference or with the social worker if needed separately to the conference.
- The completed monitoring information will be kept on the student's separate Child Protection file (that should be separate from the school record) and copies made available to all conferences and core group meetings.
- The DSL will notify the allocated social worker if the child is removed from the school roll, excluded for any period of time or goes missing and will report to other Local Authority staff as required.

## **Records**

Child protection records relating to students are highly confidential and will be kept in a designated welfare file separate to the student's education records. These records will be securely held within the school.

The DSL is responsible for ensuring that records are accurate, up to date and that recording is of a high standard.

Records should show:

- Front sheet for CP/Welfare concerns.
- Chronology sheet detailing all CP issues and actions over time.
- What the concerns were?
- What action was taken to refer on concerns or manage risk within the school?
- Whether any follow-up action was taken.
- How and why decisions were made.
- Who was notified of the concerns?
- Any other relevant paperwork including body maps etc. Please note, that photographs of injuries should NOT be taken by staff, unless a DSL has completed a 'request for service' and received confirmation in writing that they are permitted to take a picture of any injury.

Any incidents, disclosures, or signs of neglect or abuse should be fully recorded with dates, times, and locations. Records should also include a note of what action was taken. The monitoring/incident form must be completed:

- Whenever concerns arise or there is a serious incident or
- Where a child is being monitored, before a case conference or core group meeting.

Where a child who is subject to a Child Protection Plan transfers to another school, the DSL is responsible for ensuring that copies of all relevant records are passed to the DSL at the new school.

Child protection records will only be kept until the student leaves the school and should be disposed of as confidential waste unless the record contains information about sexual abuse, in which case the record should not be destroyed; this will be done in accordance with the Records Retention Policy.

### **Confidentiality and information sharing**

All information obtained by school staff about a student will be kept confidential and will only be shared with other professionals and agencies with the family's consent.

If the child is under 12, consent to share information about them must be obtained from their parents or carers. Young people aged 12 to 15 may give their own consent to information sharing if they have a sufficient understanding of the issues. Young people aged 16 and 17 are able to give their own consent if they are thought to have the capacity to do so under the Mental Capacity Act 2005; otherwise, consent should be sought from parents.

Where a child is at risk of suffering significant harm, the school has a legal duty to share this information with the relevant Local Authority Children's Services and make appropriate referrals. Equally, where a child protection investigation is taking place, the school will share any information about the child requested by the relevant Local Authority Children's Services.

Parental consent to make a child protection referral should be sought but if withheld, the referral must still be made, and parents made aware of this. Before taking this step, school should consider the proportionality of disclosure against non-disclosure.

Parental consent to referral can be dispensed with if seeking consent is likely to cause further harm to the child, interfere with a criminal investigation, or cause undue delay in taking action to protect the child. However, schools should discuss this with the Duty and Assessment team on a "no names" basis to gain advice on whether this course of action should be taken.

Only relevant information should be disclosed, and only to those professionals who need to know. Staff should consider the purpose of the disclosure and remind recipients that the information is confidential and only to be used for the stated purpose.

If a child makes a disclosure of neglect or abuse, staff cannot guarantee them confidentiality but must explain why they must pass the information on, to whom, and what will happen as a result. Parents should also be made aware of the school's duty to share information.

Staff should discuss any concerns or difficulties around confidentiality or information sharing with the designated safeguarding lead or seek advice from the relevant Local Authority Children's Services.

The school will follow the DfE guidance on Data Protection [Data protection in schools - Guidance - GOV.UK \(www.gov.uk\)](https://www.gov.uk/guidance/data-protection-in-schools)

## **Responsible People**

Safer recruitment practices are an essential part of creating a safe environment for children and will ensure that staff working are suitable to do so and do not pose any kind of risk to children.

Hambling View will follow the most recent DfE Keeping Children Safe in Education guidance:

- We will carry out extensive checks and inquiries on applicants for all positions, including voluntary and support roles and governors in accordance with statutory requirements. These checks will include an online soft search on short-listed candidates – (candidates will be informed that this check will take place).
- No staff member, volunteer or governor will be allowed to take up posts until all checks and inquiries required for that position have been satisfactorily completed. In exceptional circumstances as determined by the Proprietor a risk assessment will be completed, the result of which may permit a member of staff to work with supervision.
- Checks with the Disclosure and Barring Service will be carried out at the level appropriate to the candidate's role in the school.
- All job advertisements and application forms will clearly state that the role is one in which safeguarding is of prime importance and that applicants will be expected to agree to undergo DBS and other checks as part of safer recruitment practices.
- Staff who normally sit on interview panels will be trained in safeguarding interviewing techniques and no interview should go ahead unless at least one member of the panel has undertaken safer recruitment training.
- We will ensure they have a copy of any relevant documents or take relevant issue numbers from documents as proof that the document has been seen.
- Checks will be taken out on existing staff where concerns arise regarding their suitability to work with children, or a person moves into a post that is a regulated activity.
- The head teacher will be responsible for keeping a single central record of all staff and volunteers who work at the school.
- The single central records should include details of all checks carried out and the outcome of these checks or any certificates obtained.
- Where the school has salaried trainee teachers, the school will ensure that all necessary checks are carried out on the trainees, including DBS checks, and that the outcome of these checks is recorded on a single central record.
- For trainee teachers who are fee-funded, the school will obtain written confirmation from the training provider that the necessary checks have been carried out and that the trainee has been judged to be suitable to work with children.

Where staff are recruited via third parties such as employment agencies, the head teacher will:

- Seek written confirmation from the agency that the agency has carried out all necessary checks on the individual.
- Request written confirmation of the outcome of all checks.
- Request written confirmation that an enhanced DBS certificate has been received by the agency
- Check the identity of agency staff when they first present for work to ensure they are person against whom the checks were taken out.

## **Staff Practice and Conduct**

### **Induction and training**

The Headteacher will ensure that all staff are fully inducted, are made aware of the following policies of the school and that staff are fully aware of their role in implementing these:

- Keeping Children Safe in Education Part 1 and Appendix A
- Child Protection and Safeguarding Policy.
- The school process for reporting low-level concerns
- The School's Behaviour Policy
- The Staff Code of Conduct
- The Attendance and Children Missing Education Policy.

Staff will be asked to confirm in writing that they have received and read all relevant staff policies and the current version of Part 1 of Keeping Children Safe in Education and Appendix A.

The designated safeguarding lead will ensure that all staff are fully inducted with regard to the school child protection procedures within 7 days of starting work and that they receive safeguarding and child protection training on a two-yearly basis.

The Headteacher will keep a central record of all statutory and other training undertaken by staff members, governors, and volunteers.

School staff and governors will receive multi-agency safeguarding training provided by the relevant Local Safeguarding Children Board at the relevant level.

As well as basic safeguarding training, the designated safeguarding lead and their deputy will receive Advanced training to at least Level 3 Child Protection.

School staff will also receive training on the use of the Early Help Assessment and referral process as part of their safeguarding training.

School staff will receive regular and timely updates on child protection and safeguarding issues via the designated safeguarding lead in order to ensure they remain up to date with new legislation.

### **Conduct And Safe Teaching Practice**

Hambling View expects staff and volunteers to set a good example to students through their own conduct and behaviour and aims to protect them from the risk of allegations being made against them by ensuring they maintain high standards of professionalism and appropriate boundaries. The Code of Conduct sets out these expectations.

### **Allegations Against Staff**

In the event that an allegation is made against a member of staff (including support staff) or volunteer, the school will follow the procedures set out in Appendix 1

All allegations in relation to staff members (including support staff) will be referred to the head teacher; allegations against the head teacher will be referred to the proprietor.

Concerns including allegations that may meet the harms test should be addressed as set out in Part 4 of Keeping Children Safe in Education (See Appendix 1).

### **Low -Level Concerns:**

Sometimes the behaviour of adults working with children dips below that which we would expect of professionals. However, these incidents of behaviour which are inappropriate or questionable do

not meet the threshold of being reported further - to the LADO for example. These type of incidents/behaviours would be described as 'low-level concerns' and should be reported and logged as per the procedure in Appendix 1.

What is a low-level concern?

- Behaviour inconsistent with the staff Code of Conduct including inappropriate conduct outside of work.
- Behaviour that doesn't meet the threshold of harm and is not considered serious enough for the school to refer it to the LA (LADO).

Examples of behaviour that might constitute low-level concern:

- Being over-friendly with children.
- Having favourites.
- Adults taking photos of children with their own mobile phone (also covered in other Trust policies).
- Engaging with a child on a one-to-one basis behind a closed door or in a secluded place.
- Using inappropriate sexualised, intimidating, or humiliating language.

Why do we need a procedure?

- To keep children safe.
- To keep staff safe.
- To identify patterns of behaviour and address them as required, to reduce safeguarding risks.

See Appendix 1 for procedure

#### **Staff training:**

- All staff must know what low level concerning behaviour could look like
- All staff must know how to report any concerns they have.

#### **Whistleblowing**

Hambling View fosters a culture of openness and will put in place strategies and procedures to ensure that staff feel enabled to raise concerns relating to the safeguarding of children or poor practice within the school that may cause a risk to children.

The school recognises that there may be circumstances where staff and students feel unable to raise concerns or incidents of malpractice within their school environment as there is reasonable doubt that these would be dealt with adequately.

All staff and volunteers have a legal duty to raise concerns where they feel individuals or schools/colleges are failing to safeguard and promote the welfare of children. Where it is not possible to raise concerns within the school, staff and volunteers may report concerns to the relevant Local Authority LADO.

The following numbers can be used where there are issues regarding the school's overall procedures around safeguarding:

- the Ofsted whistle-blowing line on 0300 123 3155
- the NSPCC whistleblowing helpline on 0800 028 0285.

The Headteacher is responsible for ensuring that these numbers are advertised on the school premises and made available to staff and students.

### **Arrangements For Children Who Cannot Attend in Person Due To, For Example, Illness**

In some rare cases, children may not be able to attend school in person, for example, due to illness. In this instance:

- Professional advice will need to be sought from a specialist doctor, educational psychologist or other professional to inform the school of the reasons for not being able to attend, the length of time that the absence should be authorised for, the amount of hours that the young person is fit to spend learning while at home. If there is no evidence provided by professionals, then the child is expected to come to school in line with the school Attendance Policy.

Once this information has been established the following safeguarding arrangements will be put into place:

- A programme of remote learning will be supplied which will include dialogue between a member of staff and home
- All communication between the students and school will follow the requirements within the schools ICT Acceptable Use Policy
- A member of the school staff should 'see the child' at least once every two weeks for a 'check in'. This can be done online if the young person is not well enough to come in to the school.

If any staff who are working with these children have any concerns, they should report this to the DSL and complete a report on CPOMS. The DSL will follow up on these concerns. If the DSL is absent, staff should report to the Deputy DSL who will consult with the DSL.

### **Mental health**

All staff should also be aware that mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Only appropriately trained professionals should attempt to make a diagnosis of a mental health problem. Staff, however, are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour and education. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following the child protection policy and speaking to the designated safeguarding lead or a deputy. Link to Mental Health and Behaviour in Schools 2018:

<https://www.gov.uk/government/publications/mental-health-and-behaviour-in-schools--2>

Staff should be aware that children can abuse children, known as child-on-child abuse. Abuse should never be tolerated or passed off as "banter", "just having a laugh" or "part of growing up". All child-on-child abuse is unacceptable and will be taken seriously by the school. Students must report any child-on-child abuse to an adult member of staff. The member of staff should then pass

this information on to any member of the school safeguarding team or directly to the DSL. The DSL and safeguarding team will then determine the actions required going forward.

There is no clear boundary between incidents that should be regarded as abusive and incidents that should be dealt with by each school's behavioural and disciplinary systems. If one child or young person causes harm to another, this should not necessarily be dealt with as abuse: unkindness, physical fighting and harassment between children are not always or inevitably seen as safeguarding issues. However, it may be appropriate to regard peer on peer behaviour as abusive if harm is caused because:

- There is a significant power imbalance between the young people concerned. The abuse of children is often constructed around an age differential between the abuser and the abused, but in cases of child-on-child abuse this may not always be the case. In such circumstances, power imbalances can manifest in other ways, for example gender, social status within peer groups.
- The incident appears to be motivated out of a deliberate attempt to cause hurt or distress to an individual or group.
- The incident has had a severe impact upon an individual or group of people (even where the motivation for the incident did not seem to be to cause offence or distress); and/or
- In most cases the incident is not isolated but has happened before, and the person (or people) responsible has continued to behave in an abusive manner or use abusive language in spite of being asked not to do so. However, in exceptional circumstances a one-off incident may be considered child on child abuse.

In the context of child-on-child abuse as described in Keeping Children Safe in Education, examples could include:

- Teenage relationship abuse (both physical and emotional);
- Sexual touching/harassment, sexual violence or assault;
- Initiation/hazing type violence and rituals;
- Sexting (also known as youth produced sexual imagery or nude/semi-nude images – see NSPCC guidance);
- Prejudiced behaviours such as sexism, racism and social marginalisation;
- Bullying, where the context meets the criteria referred to above; and/or
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm.
- Upskirting.

Child-on-child abuse could constitute an equalities incident and in serious cases may be therefore reported in line with Local Authority requirements. Where the harm is attributable to sexually abusive behaviour or sexual harassment, the school will follow the relevant Local Authority Harmful sexual behaviour procedure.

School will minimise the risk of child-on-child abuse through the curriculum (PSHE, SRE for example), through staff awareness of the indicators of abuse, and through taking swift action to follow up suspicions, or allegations, of child-on-child abuse. These will be recorded using the record-keeping system and support will be provided to all parties involved as appropriate.

Staff must be aware that in addition to the vulnerable groups mentioned previously (e.g. children with a special educational need etc), the below are also most at risk from child-on-child abuse:

- Students with health conditions
- Students with mental health needs
- Students with a family member in prison or who are affected by parental offending
- Students at risk of honor-based abuse (such as female genital mutilation or forced marriage)



- Students who are persistently absent from school, including persistent absences for part of the school day

### **Harmful Sexual Behaviour, Sexual Violence And Sexual Harassment (Child-On-Child Abuse) (Including Technology Assisted Sexualised Behaviour)**

We recognise that child-on-child sexual violence and sexual harassment between students is a serious safeguarding issue and such, this behaviour will not be tolerated. Staff and students will be made aware of the standard of expected behaviour and the likely responses to any incidents of sexual violence and harassment.

The school will follow the statutory guidance of Sexual violence and sexual harassment between children contained in KCSIE and will work with relevant agencies to safeguard and support victims, take appropriate action against alleged perpetrators, and ensure a safe learning environment for all students.

School will take all necessary steps to put in place a planned PSHE curriculum to promote respectful behaviour between students with regard to sexual conduct.

School will promote an environment where victims feel empowered to raise concerns and report incidents. Any reports of sexual violence or harassment will be taken seriously and thoroughly investigated by the school and appropriate referrals made to the police and Children's Services.

School will ensure that staff receive relevant training to help them ensure an effective response to incidents that protects individual victims and safeguards the welfare of all students and staff.

School will ensure staff are able to provide appropriate support to victims and alleged perpetrators that meets their needs and continues to promote their education.

Staff and students will be made aware of the Law in relation to Upskirting which is defined as follows: 'Upskirting' is where someone takes a picture under a person's clothing (not necessarily a skirt) without their permission and or knowledge, with the intention of viewing their genitals or buttocks (with or without underwear) to obtain sexual gratification, or cause the victim humiliation, distress or alarm.

It is important to reassure victims that the law around abuse is there to protect them and not criminalise them. It doesn't matter how long it has taken to come forward and report abuse as all children will be kept safe from harm and supported.

Where the allegation involves material posted online, the school will request that the electronic device is handed over as part of the investigation and will use legal powers to search and confiscate property as set out in the statutory guidance Searching, screening, and confiscation advice for schools.

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/674416/Searching\\_screening\\_and\\_confiscation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/674416/Searching_screening_and_confiscation.pdf)

The member of staff and DSL will write up a record of the investigation that will set out how the school will respond to the incident.

Decisions on responses will be based on the harmful sexual behaviour risk assessment and thresholds set out by the relevant Local Authority. The designated safeguarding lead may take advice from Duty social workers before making a decision. Possible outcomes include referral to Early Help Services, Children's Services or the police, or managing the matter internally under school behaviour policies.

Where a referral will be made to the relevant Local Authority Children's Services or the Police under the protocol, the DSL will discuss the issue with the relevant agency, and following this discussion a decision will be made on whether and how to inform the alleged perpetrator and their parents. We will use the 'when to call the police Guidance for schools and colleges' document to aid with decision-making.

The school will take any necessary action to continue to safeguard the victim and other students within the school environment based on the level of risk established from the risk assessment, including decisions about the victim and alleged perpetrator sharing classrooms. These decisions will be reviewed in the light of ongoing police and the relevant Local Authority Children's Services investigations to take account of any changes in the status of investigations and any bail conditions placed on the alleged perpetrator.

Where necessary and appropriate, the school will consider the support needs of the alleged perpetrator and will make referrals to relevant agencies for support on their behalf.

It is important that staff do not view illegal images of children, and a written record of the disclosure must be made with the DSL or deputy DSL present.

### **Child Criminal Exploitation (CCE)**

CCE is where an individual or group takes advantage of an imbalance of power to coerce, control, manipulate or deceive a child into any criminal activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial or other advantage of the perpetrator or facilitator and/or (c) through violence or the threat of violence. The victim may have been criminally exploited even if the activity appears consensual. CCE does not always involve physical contact; it can also occur using technology. CCE can include children being forced to work in cannabis factories, being coerced into moving drugs or money across the country (county lines, see page 85 for more information), forced to shoplift or pickpocket, or threatening other young people. Some of the following can be indicators of CCE:

- Children who appear with unexplained gifts or new possessions.
- Children who associate with other young people involved in exploitation.
- Children who suffer from changes in emotional well-being.
- Children who misuse drugs and alcohol.
- Children who go missing for periods of time or regularly come home late; and
- Children who regularly miss school or education or do not take part in education.

We will make all staff aware of the indicators of involvement in, or being at risk from, violent crime and criminal exploitation. All staff will be made aware of the associated risks and the measures in place to manage these, including risks around County Lines.

### **Child Sexual Exploitation (CSE)**

CSE occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate, or deceive a child into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. CSE does not always involve physical contact; it can also occur using technology. CSE can affect any child or young person (of any gender) under the age of 18 years, including 16 and 17-year-olds who can legally consent to have sex. It can include both contact (penetrative and non-penetrative acts) and non-contact sexual activity and may occur without the child or young person's immediate knowledge (e.g. through others copying videos or images they have created and posted on social media). The above

CCE indicators can also be indicators of CSE, as can:

- children who have older boyfriends or girlfriends; and
- children who suffer from sexually transmitted infections or become pregnant.

Signs and Symptoms:

- unexplained gifts or new possessions
- association with other young people involved in exploitation.
- older boyfriends or girlfriends
- sexually transmitted infections or become pregnant.
- changes in emotional well-being
- misuse drugs and alcohol
- go missing for periods of time or regularly come home late.

If staff are aware of any of the signs and symptoms detailed above, they should follow the CP/Safeguarding school reporting procedures.

## **County Lines**

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

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

One of the ways of identifying potential involvement in county lines are missing episodes (both from home and school), when the victim may have been trafficked to transport drugs and a referral to the National Referral Mechanism<sup>103</sup> should be considered. If a child is suspected to be at risk of or involved in county lines, a safeguarding referral should be considered alongside consideration of the availability of local services/third sector providers who offer support to victims of county lines exploitation.

## **Domestic abuse**

The cross-government definition of domestic violence and abuse is: any incident or pattern of incidents of controlling, coercive, threatening behaviour, violence or abuse between those aged 16 or over who are or have been, intimate partners or family members regardless of gender or sexuality. The abuse can encompass but is not limited to psychological; physical; sexual; financial; and emotional.

All children can witness and be adversely affected by domestic abuse in the context of their home life where domestic abuse occurs between family members. Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. In some

cases, a child may blame themselves for the abuse or may have had to leave the family home as a result. Children who witness domestic abuse should also be seen as victims. Children can also be victims of domestic abuse in their own relationships and schools should follow the usual processes of support and action in such cases.

## **Prevention Of Radicalisation**

Where the school has concerns that a young person might be considering extremist ideologies and/or may be radicalised and would benefit from specialist support to challenge extremist ideologies, or that a younger student may be at risk due to their parent's radicalisation, the school will follow the guidance set out in the relevant Local Authority guidance.

In Bath and North East Somerset, a Prevent Board has been established to co-ordinate referrals in Bath and North East Somerset. To refer someone, we will use the [Prevent Referral Form](#).

All queries related to Prevent in B&NES can be discussed with Samatha Jones who will advise on the correct course of action - Email: [samantha\\_jones@bathnes.gov.uk](mailto:samantha_jones@bathnes.gov.uk)

## **Prevent**

Hambling View can help to protect children from extremist and violent views in the same ways that they help to safeguard children from drugs, gang violence or alcohol.' Work on 'Prevent 'needs to be seen in this context. The purpose must be to protect children from harm and to ensure that they are taught in a way that is consistent with the law and our values.

Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required.

Hambling View will filter and monitor all student use of IT within the school with the highest level of filtering, following guidelines for the DfE and the UK Safer Internet Centre (2023). Software is used by school leaders to regularly review internet usage and alerts are raised in Real Time when a critical word has been typed into any device.

## **The Following Guidance Lists Some of The Tell-Tale Signs That A Student Could Have Fallen Prey To Extremists.**

- Day-to-day behaviour of the student becoming increasingly concentrated around an extremist ideology.
- Changing their style of dress, particularly in a sixth form or where school uniform has been relaxed.
- Loss of contact with other friends not associated with extremist ideology.
- Using insulting or derogatory terms to describe other groups opposed by the extremists.

New guidance calls for schools to be on the lookout for other issues, such as students coming under pressure from or joining gangs, female genital mutilation and students under pressure to succumb to forced marriages.

The guidance said: "schools and college staff are particularly important as they are in a position to identify concerns early and provide help for children to prevent concerns from escalating."

## Honour Based Abuse

Is a collection of practises used to control behaviour within families to protect perceived cultural or religious beliefs and honour. Abuse can occur when offenders perceive that a relative has shamed the family or community by breaking their 'code of honour'. Honour based abuse cuts across all cultures and communities: Turkish, Kurdish, Afghani, South Asia, African, Middle Eastern, South and Eastern European for example. This is not an exhaustive list. Where a culture is heavily male dominated, HBV may exist. Where HBV is suspected the police should be informed along with DSL.

## Forced Marriage Guidance

This is an entirely separate issue from arranged marriage. It is a crime to carry out any conduct whose purpose is to cause a child to marry before their 18th Birthday. Forced marriage is a human rights abuse and falls within the Crown Prosecution Service definition of domestic violence. Young men and women can be at risk in affected ethnic groups. Whistle-blowing may come from younger siblings. Other indicators may be detected by changes in adolescent behaviours. Never attempt to intervene directly as a school or through a third party. Any evidence of this should be reported to the DSL and/or directly to the local police.

## Mandatory Reporting Of Female Genital Mutilation (FGM)

It is essential that staff are aware of FGM practices and the need to look for signs, symptoms and other indicators of FGM. ***It is the mandatory duty of school staff to report disclosures on FGM about a female under the age of 18 personally to the police.***

### What is FGM?

It involves procedures that intentionally alter/injure the female genital organs for non-medical reasons.

### Why is it carried out?

Belief that:

- FGM brings status/respect to the girl – social acceptance for marriage.
- Preserves a girl's virginity.
- Part of being a woman / rite of passage
- Upholds family honour.
- Cleanses and purifies the girl.
- Gives a sense of belonging to the community.
- Fulfils a religious requirement.
- Perpetuates a custom/tradition.
- Helps girls be clean / hygienic.
- Is cosmetically desirable.
- Mistakenly believed to make childbirth easier.

### Is FGM legal?

FGM is internationally recognised as a violation of the human rights of girls and women. It is illegal in most countries including the UK.

Circumstances and occurrences that may point to FGM happening:

- Child talking about getting ready for a special ceremony.
- Family taking a long trip abroad.
- Child's family being from one of the 'at risk' communities for FGM (Kenya, Somalia, Sudan, Sierra Leon, Egypt, Nigeria, Eritrea as well as non-African communities including Yemeni, Afghani, Kurdistan, Indonesia, and Pakistan)
- Knowledge that the child's sibling has undergone FGM.
- The child talks about going abroad to be 'cut' or to prepare for marriage.

Signs and Symptoms that may indicate a child has undergone FGM:

- Prolonged absence from school and other activities
- Behaviour changes on return from a holiday abroad, such as being withdrawn and appearing subdued.
- Bladder or menstrual problems
- Finding it difficult to sit still and looking uncomfortable.
- Complaining about pain between the legs
- Mentioning something somebody did to them that they are not allowed to talk about
- Secretive behaviour, including isolating themselves from the group.
- Reluctance to take part in physical activity.
- Repeated urinal tract infection
- Disclosure

**The 'One Chance' rule** - As with Forced Marriage there is the 'One Chance' rule. Settings/schools/colleges must take **action without delay**. Any concern of this should be reported to the DSL and/or directly to the local police and Local Authority.

Further information can be found in the following DFE document: [Multi-agency statutory guidance on female genital mutilation - Publications - GOV.UK](#)

### **Private Fostering**

Private fostering applies to any child under the age of 16 who is living with someone who is not their immediate relative for a period of 28 days or more. Schools have a mandatory duty to inform the Local Authority of children in such arrangements.

### **Online Safety/ Cyber Crime**

The use of technology had become a significant component of many safeguarding issues. Child sexual exploitation, radicalisation, sexual predation: technology often provide a platform to facilitate harm. Effective approaches in schools empowers them to protect and education the whole school community in their use of technology and establish mechanisms to identify, intervene in, and escalate any incident where appropriate. Staff will be made aware of the three categories of risk set out in Keeping Children Safe in Education: Content, Contact and Conduct.

Cyber Crime is defined as a criminal activity committed using computers and/ or the internet and includes activities such as hacking and creating malware. Some students who are skilled in technology may be drawn into cybercrime. Staff need to be aware of the signs to look out for and report to their Designated Safeguarding Leads.

As part of its duty to provide a safe learning environment and ensure students know how to remain safe online, Hambling View will use the guidance contained in KCSIE and will use the following to maintain the safety of young people while using our IT systems:

## **Gateway to security Services / Firewall is provided by Watchguard**

- All student internet access has the highest level of filtering.

## **Hambling View Approach to Monitoring**

- Senso software is used on all devices owned/provided by MIAG Independent Schools
- Senso software logs all keystrokes on all devices for all users (staff, students, guests)
- Student logs are reviewed regularly
- Acceptable User Policy / Mobile Phone Policy
- All safeguarding staff will receive a weekly report.

## **Child Abduction**

Child abduction occurs when a child is taken from their parents/ carers without permission. It can be committed by parents, family members or people unknown to the child. Staff need to be vigilant to unknown adults loitering near the school grounds or trying to talk to children. Hambling View will ensure that they have a collection of children procedures in place to reduce the risk of child abduction. Any suspicious activity must be reported to the DSL/ Head teacher/ Police.

## **Modern Slavery**

It is important that school staff have an awareness of modern slavery, and the different exploitation linked to it, CSE, CCE, human trafficking, organ trafficking, forced labour. Any staff member who has concerns around modern slavery needs to discuss with the DSL who can refer to the National referral mechanism.

- National Crime Agency's CEOP education programme: Thinkuknow
- Public Health England: Rise Above
- Relationships & Sex Education Policy (RSE)

## **Looked After and Previously Looked After Children And Care Leavers**

At Hambling View, we recognise that looked after and previously looked after children and care leavers are particularly vulnerable due to their status and their pre-care experiences.

## **Children With Special Education Needs and/or Disabilities (SEND)**

Hambling View is aware that children with special education needs or disabilities may be more vulnerable to harm and abuse and may be more likely to experience bullying. They may also have difficulty in reporting harm and abuse due to communications difficulties and professionals may miss vital indicators.

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). Staff should be aware of this and adjust teaching and support appropriately. It may be necessary to run additional sessions for our children to help them understand risks.

School procedures reflect these issues and recognise that staff need to be able to help our students to overcome barriers to seeking help.

## **Safeguarding Vulnerable Groups**

Hambling View is aware that some students may be living in circumstances that may make them more vulnerable to abuse, neglect or poor outcomes and who may need help or intervention from Early Help Services, the relevant Local Authority Children's Services or other agencies to overcome problems or keep them safe. These include children at risk of forced marriage, domestic abuse and/or sexual violence, privately fostered children and young carers.

## **Contextual Safeguarding for Young People**

All staff should be aware that safeguarding incidents and/or behaviours can be associated with factors outside the school or college and/or can occur between children outside of these environments. All staff, should consider whether children are at risk of abuse or exploitation in situations outside their families. Extra-familial harms take a variety of different forms and children can be vulnerable to multiple harms including (but not limited to) sexual exploitation, criminal exploitation, and serious youth violence.

Hambling View will adhere to the relevant Local Authority policies whenever there are concerns that young people are at risk from any of the following issues: children at risk of sexual exploitation, young people at risk from gang activity or serious youth violence and children who run away/go missing.

## **Children Requiring Mental Health Support**

School staff have an important role to play in supporting the mental health and wellbeing of the students at Hambling View. A mental health and wellbeing plan will be reviewed annually to ensure that adequate steps are taken to support the mental health and wellbeing of the students.

## **Other relevant safeguarding documentation**

**Schools can access guidance on the following policies at [www.nspcc.org.uk](http://www.nspcc.org.uk) and [Department for Education - GOV.UK](http://www.gov.uk)**

Alternative provision

<https://www.gov.uk/government/publications/alternative-provision>

Anti-discrimination & harassment

Attendance

<https://www.gov.uk/government/publications/parental-responsibility-measures-for-behaviour-and-attendance>

Behaviour and discipline

<https://www.gov.uk/government/publications/behaviour-and-discipline-in-schools-guidance-for-governing-bodies>

Bullying (including cyberbullying)

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/288444/preventing\\_and\\_tackling\\_bullying\\_march14.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/288444/preventing_and_tackling_bullying_march14.pdf)

Children missing from school

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/268987/cme\\_guidance.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/268987/cme_guidance.pdf)

Complaints

Data protection toolkit

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

Drugs/substance misuse

[Drugs: advice for schools - Publications - GOV.UK](http://www.gov.uk/government/publications/drugs-advice-for-schools)

Educational visits



Equality and diversity

Exclusion of students

<https://www.gov.uk/government/publications/school-exclusion>

Fabricated or induced illness

Faith abuse

<https://www.gov.uk/government/publications/national-action-plan-to-tackle-child-abuse-linked-to-faith-or-belief>

First aid and administration of medicines

Supporting children with medical conditions

[Supporting students at school with medical conditions - Publications - GOV.UK](#)

Mental health

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/508847/Mental\\_Health\\_and\\_Behaviour\\_-\\_advice\\_for\\_Schools\\_160316.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/508847/Mental_Health_and_Behaviour_-_advice_for_Schools_160316.pdf)

Private fostering

Promoting British values/Radicalisation and violent extremism

[Promoting fundamental British values through SMSC - Publications - GOV.UK](#)

SRE

Sexting

Gender-based violence/teenage relationship abuse

Trafficking

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/177033/DFE-00084-2011.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/177033/DFE-00084-2011.pdf)

When to call the police Guidance for schools and colleges

<https://leap.hillingdon.gov.uk/article/4159/When-to-call-the-Police-Guidance-for-schools--colleges>

## **Appendix 1 – Procedures For Allegations Against Staff**

### **1) allegations that may meet the harms threshold**

This section is based on ‘Section 1: Allegations that may meet the harms threshold’ in part 4 of Keeping Children Safe in Education.

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 they 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

If we’re in any doubt as to whether a concern meets the harm threshold, we will consult our local authority designated officer (LADO).

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 proprietor 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.

If we receive an allegation of an incident happening while an individual or organisation was using the school premises to run activities for children, we will follow our safeguarding policies and procedures and inform our LADO.

### **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 if possible
- 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

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.
- 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 Headteacher 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

### **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. We will retain all records at least until the accused 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

The section is based on 'Section 2: Concerns that do not meet the harm threshold' in part 4 of Keeping Children Safe in Education.

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
- Safeguarding concern or allegation from another member of staff
- 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

What is a low-level concern?

- Behaviour inconsistent with the staff Code of Conduct including inappropriate conduct outside of work.
- Behaviour that doesn't meet the threshold of harm and is not considered serious enough for the school to refer it to the LA (LADO).

Examples of behaviour that might constitute low level concern:

- Being over friendly with children.
- Having favourites.
- Adults taking photos of children with their own mobile phone (also covered in other Trust policies).
- Engaging with a child on a one-to-one basis behind a closed door or in a secluded place.
- Humiliating a child/children

## **Using Inappropriate Sexualised, Intimidating or Humiliating Language**

### **Sharing Low-Level Concerns**

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to confidentially 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
- 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 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. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL where the DSL is not the headteacher.

### **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 is no longer employed 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