Title and Description	Child Protection and Safeguarding Policy

Date of last review	September 2025
Approved by	Local Governing Board
To be reviewed by	Local Governing Board
Responsibility	Director of Safeguarding
Review period	Annually
Date of next review	September 2026

Document History			
Version	Date of Review	Author	Notes on Revision
2	September 2023	Michele Osborne	Policy updated to reflect current changes in KCSIE 2023. P8 5.3 iii – Names changed of Pastoral Managers. P15 7.11 – Note regarding CEOP Education Programme. P18 7.12 – Wording change to child on child. P21 9.1 – Online filtering and monitoring section added. Section also added regarding Cyber security and how we meet technical standards of online safeguarding. P22 10.4 – Section added with regard to EHCP students and EHE. P22 10.5 – Link to support services added. P24 13.6 – Note added with regard to preservation of records regarding allegations of abuse. P29 App 2 – Note added about shortlisting process and online searches as part of due diligence checks. P35 – Note added regarding allegations made against individuals not directly employed by the school/Academy and safeguarding procedures following this. P39 App 4 – Note added regarding children 'absent' from education'. P41- Note added regarding honour based abuse and that any marriage under the 18 of 18 years is illegal. P43 – Change of wording to extremist ideology and radicalisation. P44 – Change of wording to include possible indicators of a student being radicalised. P47 – Staff names changed of those qualified to practice Team Teach techniques.
3	September 2024	Michele Osborne	Policy updated to reflect current changes in KCSIE 2024. P3 – Table of key contacts added. P 7 & 8 – wording added for definition of safeguarding, exploitation and ROTH. P 8 - Online Safety Hub for Parents & Carers added. P 9 – Safer working practices section added to include safeguarding and Alternative Provisions. P 10 - Further information added on Equalities Act 2010. P 11 – Names of Pastoral Managers amended. P 13 – 7 Golden Rules of Safeguarding added for clarity & Note regarding Data Protection. P 15 – Early Help Referral link added. P 20 – Hacketts Continuum Harmful Sexual Behaviours added. P22 – wording added for nudes. P22 Wording of adult involved nudes included. P 26 – Reference to AI added with regard to online safety. P27 – Safeguarding procedures to EHE applications added and link to NSPCC website included. Reference to SEND students and vulnerabilities. P28 – Gender questioning section added and involvement of parents. P 31 – Wording added to types of abuse & recognising abuse.

			P36 Reference to Lanyard Protocols P38 – Procedures for allegations against staff added. P 39 – LADO contacts added. P44 – Wording added with regard to unexplainable and/or persistent absence and safeguarding. P45 Amended paragraph of CSE. P48 Wording regarding terrorism added. P52 – Section added regarding procedures for students not collected from school site.
4	September 2025	Michele Osborne	P3 Change of staff name. P6 AI Summary of Policy Included. P8 Use of Gen AI & BYOD Policy referenced. P9 Link to Guidance on nudes added. P10 Addition of Safer Recruitment checks for AP's reference and CiC wording amended. P12 Name change added for DDSL. P23 Link to 'Shore' added for sexualised behaviours. P26 Reference to AI included. P29 Guidance in relation to AI included and professionals helpline added for Online Safety. P29 Comment added in relation to Sixth Form students mobile phone use, curriculum coverage of 4 C's of online safety & Role of Virtual HT note. P32 Supreme Court Judgement ruling added in relation to biological sex. P33 Change of word to 'briefing'. P34 New policy reference added. P36 Change of job title to Chief Operating Officer. P40 Lanyard link protocol added for Sixth Form. P43 Wording added and COO added. P41 Change of wording and reference to Teacher Regulation Agency added. P44 Reference to Teacher Regulation Agency added. P43 Staff Safe system referenced. P46 Added example of emotional harm and humiliation. P49 Link to Children's Society added regarding Preventing CCE. P54 Added note about reasonable force and reporting. P54 Name refence removed.

Role/Organisation	Name	Contact details
Headteacher	Mr Michael Wright	
Director of Safeguarding	Mrs Michele Osborne	Osborne.m@framdurham.com
DDSL's	Ms Kate O'Neill Mr Fran Ward Mr Mark McCreedy	Oneill.k@framdurham.com Ward.f@framdurham.com Mccreedy.m@framdurham.com
LADO – Local Authority Designated Officer	Mrs Sharon Lewis Ms Louise Brookes	03000268835
Chair of Governors	Mrs Angela Darnell	
Governor lead for child protection and safeguarding	Mrs Joanne Thorns	
Durham Police		101 or 999 for immediate threat to life
First Contact/Social Services		030002697979

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AI Summary of this Policy

Framwellgate School Durham's 2025 Child Protection and Safeguarding Policy outlines a robust framework to ensure the safety and wellbeing of all students. The policy is grounded in statutory guidance including *Keeping Children Safe in Education (KCSIE)* and *Working Together to Safeguard Children*, and is reviewed annually by the Local Governing Board.

The school promotes a culture of excellence, compassion, and respect, with safeguarding embedded across all aspects of school life. The Designated Safeguarding Lead (DSL), supported by deputies and pastoral staff, oversees safeguarding procedures. All staff receive annual training and are expected to identify and respond to signs of abuse, neglect, exploitation, and radicalisation.

Key areas include child-on-child abuse, sexual harassment, harmful sexual behaviour, online safety, and mental health. The policy addresses risks both inside and outside school, including contextual safeguarding, cyber threats, and the use of AI. Robust online filtering and monitoring systems are in place, and students are educated on digital safety.

The school ensures inclusive safeguarding for vulnerable groups, including SEND students, children in care, and those at risk due to home circumstances. Safer recruitment practices are followed, and allegations against staff are handled with fairness and transparency.

Information sharing is guided by GDPR and DPA 2018, prioritising child welfare. All concerns are recorded on CPOMS, and referrals are made to relevant agencies when necessary.

The policy is supported by linked documents covering bullying, domestic abuse, extremism, and more, ensuring a comprehensive approach to child protection.

Child Protection and Safeguarding Policy

Framwellgate School Durham: Ethos and Values Statement

Excellence, Compassion and Respect for All

Our school promotes academic excellence and embraces the shared values of honesty, integrity, respect and compassion. We want our students to be ambitious, kind, resilient and hardworking, and have a genuine passion for learning. We want them to change the world with the knowledge, skills and confidence they have learned here; to champion fairness, build friendships for life, and have pride in our school. Above all, we want our students to be happy.

British Values

All staff are expected to uphold and promote fundamental British Values including democracy, the rule of law, individual liberty and mutual respect and tolerance of those with different faiths and beliefs.

1. Introduction

At Framwellgate School we are committed to safeguarding and prioritising the welfare of all our students. The purpose of this policy is to ensure that every child who is a registered student at Framwellgate is safe and protected from harm in school.

1.1 Legislation and Statutory Guidance: This policy is based on the Department for Education's

statutory guidance, Keeping Children Safe in Education and Working Together to Safeguard Children, and the Governance Handbook. We comply with this guidance and the procedures set out by our local safeguarding children partnership. The following legislation also applies:

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

ii. 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

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

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

v. Schedule 4 of the Safeguarding Vulnerable Groups Act 2006, which defines what 'regulated activity' is in relation to children

vi. Statutory guidance on the Preventing radicalisation, which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism/terrorism

vii. Section 175 of the Education Act 2002, which places a duty on schools and local authorities to safeguard and promote the welfare of students

viii. The School Staffing (England) Regulations 2009, which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques

ix. Part 3 of the schedule to the Education (Independent School Standards) Regulations 2014, which places a duty on academies to safeguard and promote the welfare of students at the school

x. Care Act (2014) http://www.legislation.gov.uk/ukpga/2014/23/contents/enacted which places a statutory duty to safeguard adults. For students aged 18 and over who are considered at risk of harm, we will follow guidance outlined by County Durham Safeguarding Adults Interagency Partnership.

This Child Protection Policy links with other school documentation including safer recruitment procedures as well as other Policies/Position Statements. Examples of relevant documentation include those on:

- Safer Recruitment

- Child Sexual Exploitation

- Extremism and the Prevent Strategy

- Behaviour Management (Culture for Learning) including exclusions

- Equality, Diversity and Community Cohesion

- Anti-Bullying

- Online Safety

- Missing Child

- Confidentiality and information sharing

- Visits

- Access by Visitors to students

- Alternative Provision

- ICT Acceptable Use

- Staff Code of Conduct

- BYOD Policy

- Use of Generative AI Policy

2. Aims

2.1 Framwellgate School Durham aims to ensure that:

i. Appropriate action is taken in a timely manner to safeguard and promote children's welfare and safety

ii. All staff are aware of their statutory responsibilities with respect to safeguarding

iii. Staff are properly trained in recognising and reporting safeguarding issues

2.2 The purpose of the policy is, therefore, to ensure that our children's welfare is of paramount importance, early and additional help is offered to prevent escalation and where child protection concerns are identified, referrals are handled sensitively, professionally and in ways that support the needs of the child's well-being

2.3 Trustees, Governors and staff are committed within our school to safeguarding and promoting the welfare of children in our care through all our policies, procedures and practices. We expect all our parents and visitors to share this commitment and understanding

2.4 Framwellgate School Durham recognises the contribution it can make to keeping children safe and supporting the students in its care, through:

i. Prevention (positive school atmosphere, careful and vigilant teaching, pastoral care, support to students, providing good adult role models and the identification of early and additional support/services to children and families and recognising and reducing risks to children including harassment, bullying, victimisation, sexual violence and sexual harassment, criminal and sexual exploitation, preventing radicalisation (extremism,

radicalisation and terrorism) and issues such as honour based abuse, female genital mutilation and forced marriage)

ii. Protection (following agreed procedures, ensuring all staff respond appropriately and sensitively to child protection concerns and that every member of staff has regular training and updates at least annually and are supported to refer their concerns to the Designated Safeguarding Lead or Deputy Designated Safeguarding Lead or The First Contact Team (03000 267 979) directly IF NECESSARY. In certain specific cases such as female genital mutilation (Mandatory reporting of FGM from October 2015), radicalisation or forced marriage there are SPOCS/named teams and individuals within the police who can be contacted)

iii. Reconsideration (following and challenging the progress of new referrals and existing

cases to ensure that individual cases are reconsidered if there remains no improvement to a child's circumstances)

    iv.   Support (for students and school staff and for children who may be vulnerable due to their individual circumstances or extra-familial harm and taking action to enable all children to have the best outcomes)

2.5   Framwellgate School is committed to keeping children safe and safeguarding all children in accordance with Child Protection: Durham Local Safeguarding Children Partnership http://www.durham-scp.org.uk/ and partner agencies in all cases where there is a concern about significant harm.

Significant Harm is defined in The Children's Act 1989 as the ill-treatment (including sexual abuse and physical abuse) or the impairment of health (physical or mental) or development (physical, intellectual, emotional, social or behavioural) as compared to a similar child.

Note: harm now includes the impairment of a child's health or development as a result of witnessing the ill treatment of another person (Adoption and Children Act 2002).

3. Definitions

Safeguarding and promoting the welfare of children means:

    i.   Protecting children from maltreatment, whether that is within or outside of the home including online. Providing support and help for children as soon as problems emerge.

    ii.   Preventing impairment of children's mental and physical health or development

    iii.   Ensuring that children grow up in circumstances consistent with the provision of safe and effective care

    iv.   Taking action to enable all children to have the best outcomes

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

Abuse is a form of maltreatment of a child and may involve inflicting harm or failing to act to prevent harm.This also includes any form of exploitation.

Neglect is a form of abuse and is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Appendix 1 defines neglect in more detail.

Sharing of nudes and semi-nudes (also known as sexting or youth-produced sexual imagery) is where children share nude or semi-nude images, videos or live streams. This also includes pseudo-images that are computer-generated images that otherwise appear to be a photograph or video.

Further guidance can be found here; Sharing nudes and semi-nudes: advice for education settings working with children and young people (updated March 2024) - GOV.UK

Children includes everyone under the age of 18.

Contextual Safeguarding and Risks Outside of the Home

Safeguarding incidents and/or behaviours can be associated with factors outside of school and can occur

between children outside of school in the community. Staff will consider the context within such incidents and/or behaviours. This will be done through assessing the wider environmental factors that are present in a child's life that are a threat to their safety and welfare.

Geographical Factors	School Response
We have close proximity to very busy roads	SLT and wider staff teams support students as they arrive at the school site and leave the site at the end of the day. Road safety is also part of the curriculum and inappropriate or dangerous behaviour is challenged by staff.
Social and Economic Factors	School Response
Derelict shops or buildings or unsafe areas surrounding school.	We teach students about personal safety and making the right choices when outside of school. Student receives assemblies on Anti-Social behaviour and consequences of this. We work with the Fearless Project also to reduce criminal and anti-social behaviour outside of school. We work closely with students who are at risk in the community and liaise with local Police and PCSO where necessary.
Peer Group Factors	School Response
Students have older siblings or negatively influenced by other peers.	Our curriculum teaches students about peer pressure and 'child-on-child abuse'. Students are also educated on resilience and anti-bullying and all year groups take part in anti-bullying week activities.
Home Factors	School Response
Use of the internet outside of school and use of gaming devices with their peers.	Through the curriculum students are taught about online safety and e safety. Students are aware of our acceptable use policy and our online monitoring systems in school. Parents are also supported with online activity and how to set up appropriate controls for safe online usage. The introduction of our Online Safety Hub will support parents/carers with their child's online activity and usage.

Safer Working Practices and Alternative Provision

Framwellgate School will continue to be responsible for the safeguarding of all of its students who may attend an Alternative Provision as part of their school week. All Alternative Provision providers are approved by Durham County Council and are regularly visited by key staff in school to ensure their suitability to meet our students needs. Letters of assurance are received by all Alternative Provision Providers to ensure safeguarding practices are in place, this includes safer recruitments checks for staff.

4. Equality statement

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

particularly alert to the potential need for early help for a child who:

   i.   Has special educational needs or disabilities (whether or not they have a statutory Education, Health and Care Plan)

   ii.   Are young carers

   iii.   May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality

   iv.   Has English as an additional language

   v.   Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence

   vi.   Is misusing drugs or alcohol themself

   vii.   Is showing signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups

   viii. Is frequently missing/goes missing from home or care

   ix.   Are at risk of FGM, sexual exploitation, modern slavery, trafficking, forced marriage, or radicalisation

   x.   Are asylum seekers

   xi.   Are at risk due to either their own or a family member's mental health needs

   xii.   Are looked after or previously looked after children in care

   xiii. Are missing from education

   xiv.   Whose parent/carer has expressed an intention to remove them from school to be home educated

   xv.   Is a privately fostered child

4.2   The Equality Act 2010

This policy has been devised in accordance with the Equality Act 2010. Schools and Colleges have obligations under the Equality Act 2010. According to the Equality Act, schools and colleges must not unlawfully discriminate against students because of their sex, race, disability, religion or belief, gender reassignment, pregnancy and maternity, or sexual orientation (protected characteristics). Whilst all of the above protections are important, in the context of safeguarding, this guidance, and the legal duties placed on schools and colleges in relation to safeguarding and promoting the welfare of children, governing bodies and proprietors should carefully consider how they are supporting their students with regard to particular protected characteristics - including disability, sex, sexual orientation, gender reassignment and race.

Provisions within the Equality Act allow schools and colleges to take positive action, where it can be shown that it is proportionate, to deal with particular disadvantages affecting students with a particular protected characteristic in order to meet their specific need; this includes a duty to make reasonable adjustments for disabled children and young people. The school, could, for example, consider taking positive action to support girls if there was evidence they were being disproportionately subjected to sexual violence or sexual harassment.

5. Roles and responsibilities

5.1   Safeguarding and child protection is **everyone's** responsibility. This policy applies to all staff, volunteers and governors in the school and is consistent with the procedures of Durham Local Safeguarding Children Partnership. Our policy and procedures also apply to extended school and off-site activities.

5.2   Staff who work directly with children will read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually. Staff who <u>don't</u> work directly with children will read annex A of KCSIE (a condensed version of part 1) All staff will sign a declaration at the beginning of each academic year to say that they have reviewed the guidance. All staff will be aware of:

   i.   Our systems which support safeguarding, including the staff behaviour handbook the role of the designated safeguarding lead (DSL), the behaviour policy, the remote learning policy and the safeguarding response to children who go missing from education

   ii.   The early help process and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

   iii.   The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play

   iv.   What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

   v.   The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), serious violence indicators, county lines, upskirting, FGM and radicalisation

   vi.   The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

5.3   **The Designated Safeguarding Lead (DSL)**

   i.   Our DSL is Michele Osborne, Director of Safeguarding. The DSL takes lead responsibility for child protection and wider safeguarding

   ii.   During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns

   iii.   When the DSL is absent/unavailable during school hours, the deputies, Kate O'Neill, Assistant Head, Fran Ward, Assistant Head and Mark McCreedy, as well as the Pastoral Managers for each year group will act as cover.

   iv.   Out of school hours, any staff member, volunteer or governor can refer to children's social care and/or the police immediately if they become aware that a child is in immediate danger or is at risk of harm. Anyone (including members of the public) can make a referral on 03000 26 79 79. Professionals will be required to use the Children's Services Referral Form. See section 7.1 for further details. You must inform the DSL as soon as possible if you make a referral directly and record your actions on CPOMS.

5.4   The DSL will be given the time, funding, training, resources and support to:

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

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ii.   Take part in strategy discussions and inter-agency meetings and/or support other staff to do so

iii.   Contribute to the assessment of children

iv.   Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly

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

vi.   Act as a point of contact with the three safeguarding partners (Durham Safeguarding Children Partnership)

vii.   Liaise with staff (especially pastoral support staff, school nurses, IT Technicians, SENDCO, SENDCO Support Assistant or Emotional Wellbeing Worker) on matters of safety and safeguarding (including online and digital safety) and when deciding whether to make a referral by liaising with relevant agencies

viii.   As required liaise with the case manager (Headteacher) or where the Headteacher is the subject of the allegations, the Chair of Governors and the Designated Officer, operating on behalf of the Local Authority for child protection concerns (all cases which concern a staff member)

ix.   Liaise with the Headteacher to inform them of issues, especially ongoing enquiries under section 47 of the Children Act 1989 and police investigations

x.   Act as a source of support, advice and expertise to staff on matters of safety and safeguarding and when deciding whether to make a referral by liaising with relevant agencies.

5.5   **The Local Governing Board/Trust Board**

The Trust Board via the LGB will approve this policy at each review and hold the Headteacher to account for its implementation. The Governing Board and Trustees receive training to clarify their statutory role in keeping children safe to support their quality assurance of those statutory arrangements.

The governing board will appoint a Link Governor (Rev. Joanne Thorns) to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL. The role of this person is to:

i.   Ensure that the allocation of funding and resource is sufficient to meet the current safeguarding and child protection activity and challenge the safeguarding activity

ii.   Ensure the self-assessment tool and Designated Safeguarding Lead report demonstrates fully and accurately the safeguarding arrangements and any action to progress areas of weakness or development

iii.   Ensure that the governing body receives training to clarify their statutory role in keeping children safe to support their quality assurance of those statutory arrangements

iv.   Ensure that the governing body is aware of the changes to Local Safeguarding Children Partnership arrangements and the need for the school/college to understand their role in effective multi-agency working under the new arrangements

The chair of governors, Angela Darnell will act as the 'case manager' in the event that an

allegation of abuse is made against the Headteacher, where appropriate.

All Governors will take part in Governor Safeguarding Training and will take part in Bitesize Safeguarding Training and other relevant training needs where necessary.

5.6 The Headteacher

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

i. Ensuring that staff (including temporary staff) and volunteers are informed of this policy as part of their induction.
ii. Communicating this policy to parents when their child joins the school and via the school website.
iii. Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent.
iv. Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly.
v. Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate.

6. Confidentiality

6.1 Framwellgate School Durham is committed to ensuring effective safeguarding by sharing information with all relevant safeguarding partners.

It should be noted that:

i. Timely information sharing is essential to effective safeguarding

ii. Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children

iii. The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe. The updated KCSIE guidance recommends that education professionals read the DfE Data Protection guidance for schools (DfE, 2024b). This includes guidance on record keeping, emails and other schools.

iv. If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk

v. Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests

vi. The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

The 7 'golden rules' are:

1. Data protection law and human rights do not stop information being shared - they provide the structure around how it should be shared.
2. Be open and honest about why you need to share the information, what you are going to share, how you will do it and who you are going to share it with. Unless it is not safe or inappropriate to do so you must seek the person's agreement to this.

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3. If you are worried about sharing information seek advice from the Designated Safeguarding Lead or a member of the Safeguarding Team.

4. Where possible share information with consent. There are occasions where consent is not required, namely if you are worried that a child is at risk or a crime is going to be or has been committed. Where information is shared or requested (either with or without consent) make sure you are clear why you decided to share it, and equally why you decided not to share information if that is the case. Where you do not have consent bear in mind that the individual may not expect information to be shared.

5. Decisions to share information should include consideration of the safety and well-being of the person who you are sharing information about and others who may be affected by what happens.

6. Make sure that you share only information that is necessary for the purpose for which you are sharing it, that it is only shared with people who need to know, that it is up to date, shared securely and that it is done in a timely way.

7. Make sure you record your decision whether to share information or not and the reasons for your decision. The record should also show what you have shared, with whom and why.

vii.   If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy) All staff should be able to identify possible signs of abuse, neglect and signs of exploitation.

7. Recognising abuse and taking action

All staff are expected to be able to identify and recognise all forms of abuse, neglect and exploitation and shall be alert to the potential need for early help for a child who:

Is disabled

Has special educational needs (whether or not they have a statutory education health and care (EHC) plan)

Is a young carer

Is bereaved

Is showing signs of being drawn into anti-social or criminal behaviour, including being affected by gangs and county lines and organised crime groups and/or serious violence, including knife crime

- Is frequently missing/goes missing from education, care or home

- Is at risk of modern slavery, trafficking, sexual and/or criminal exploitation

- Is at risk of being radicalised or exploited

- Is viewing problematic and/or inappropriate online content (for example, linked to violence), or developing inappropriate relationships online

- Is in a family circumstance presenting challenges for the child, such as drug and alcohol misuse, adult mental health issues and domestic abuse

- Is misusing drugs or alcohol

- Is suffering from mental ill health

- Has returned home to their family from care

- Is at risk of so-called 'honour'-based abuse such as female genital mutilation (FGM) or forced marriage

- Is a privately fostered child

- Has a parent or carer in custody or is affected by parental offending

- Is missing education, or persistently absent from school, or not in receipt of full-time

education

- Has experienced multiple suspensions and is at risk of, or has been permanently excluded

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

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

7.1   If a child is in immediate danger

Any staff member, volunteer or governor can refer to children's social care and/or the police **immediately** if a child is in immediate danger or at risk of harm. **Anyone (including members of the public) can make a referral on 03000 26 79 79**. Professionals will be required to use the **Children's Services Referral Form**. The **Threshold Document (0-19 Level of Need)** may be a useful reference tool. Please email your completed form to firstcontact@durham.gov.uk.

Tell the DSL as soon as possible if you make a referral directly. You must record your actions on CPOMS and upload any referral documentation onto CPOMS.

7.2   If a child makes a disclosure to you, you should:

i.   Listen to and believe them. Allow them time to talk freely and do not ask leading questions

ii.   Stay calm and do not show that you are shocked or upset

iii.   Tell the child they have done the right thing in telling you. Do not tell them they should have told you sooner

iv.   Explain what will happen next and that you will have to pass this information on. Do not promise to keep it a secret

v.   Write up your conversation as soon as possible in the child's own words. Stick to the facts, and do not put your own judgement on it

vi.   Sign and date the write-up and upload onto CPOMs with an alert to the DSLs. Alternatively, if appropriate, make a referral to children's social care and/or the police directly (see 7.1), and tell the DSL as soon as possible that you have done so (the same day).

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

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

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

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

- **Any teacher** who discovers that an act of FGM appears to have been carried out on a student under 18 **must** immediately report this to the police, personally on 101. This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

- The duty above does not apply in cases where a student is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine students.

- **Any other member of staff** who discovers that an act of FGM appears to have been carried out on a student under 18 **must** speak to the DSL and follow our local safeguarding procedures as outlined in 7.1.

- **Any member of staff** who suspects a student is *at risk* of FGM or discovers that a **student age 18 or over** appears to have been a victim of FGM, **must** speak to the DSL and follow our local safeguarding procedures as outlined in 7.1

7.4   If you have concerns about a child (as opposed to a child being in immediate danger)

(7.8 illustrates the procedure to follow if you have concerns about a child's welfare and the child is not in immediate danger).

Where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly as outlined in 7.1.

You can also contact the charity NSPCC on 0808 800 5000 if you need advice on the appropriate action.

Serious consideration must be given when a child discusses incidents with you, that they may not understand that they are disclosing safeguarding concern. We must consider that children may not feel ready or know how to tell someone that they are being abused. Any discussions in the first instance must be dealt with sensitively.

Early Help Assessment

If an early help assessment is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate. Pastoral staff in school and DSL's are appropriately trained and are able to identify and recognize any concerns that do not meet the harm threshold and where an early help assessment is more appropriate.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed. We may also consult with Early Help where students are frequently missing/go missing from education, home or care has experienced multiple suspensions, or is at risk of being permanently excluded from schools, colleges and in alternative provision or a pupil referral unit. Or where a parent or carer in custody or is affected by parental offending. Referrals can be made using this link- https://durham-scp.org.uk/practitioners/early-help/

Referral

If it is appropriate to refer the case to local authority children's social care or the police, the DSL will make the referral or support you to do so. If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

If the child's situation does not seem to be improving after the referral, the DSL or person who made the referral must contact the local authority and make sure the case is reconsidered to ensure the concerns have been addressed and the child's situation improves.

7.5   As an Operation Encompass partner we work closely with Durham Constabulary (Operation Encompass Lead) with regards to domestic abuse incidents and offer wellbeing checks to our students if we are contacted following an incident which has occurred in one of our students homes.

7.6   If you have concerns about extremism

If a child is not at immediate risk of harm, where possible, speak to the DSL first to agree a course of action. Alternatively, make a referral to local authority children's social care directly if appropriate (see 'Referral' above).

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include the police or Channel, the government's programme for

identifying and supporting individuals at risk of becoming involved with or supporting terrorism, or the local authority children's social care team.

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

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

i. Think someone is in immediate danger

ii. Think someone may be planning to travel to join an extremist group

iii. See or hear something that may be terrorist-related

7.7   Children requiring mental health support

Schools and colleges have an important role to play in supporting the mental health and wellbeing of their students. All staff should 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 childhood experiences, this can have a lasting impact through childhood, adolescence and into adulthood. It is key that staff are aware of how 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, in accordance with this policy and speaking to the designated safeguarding lead or deputies.

7.8   The flowchart below summarises some key steps in the process when child concerns are raised:
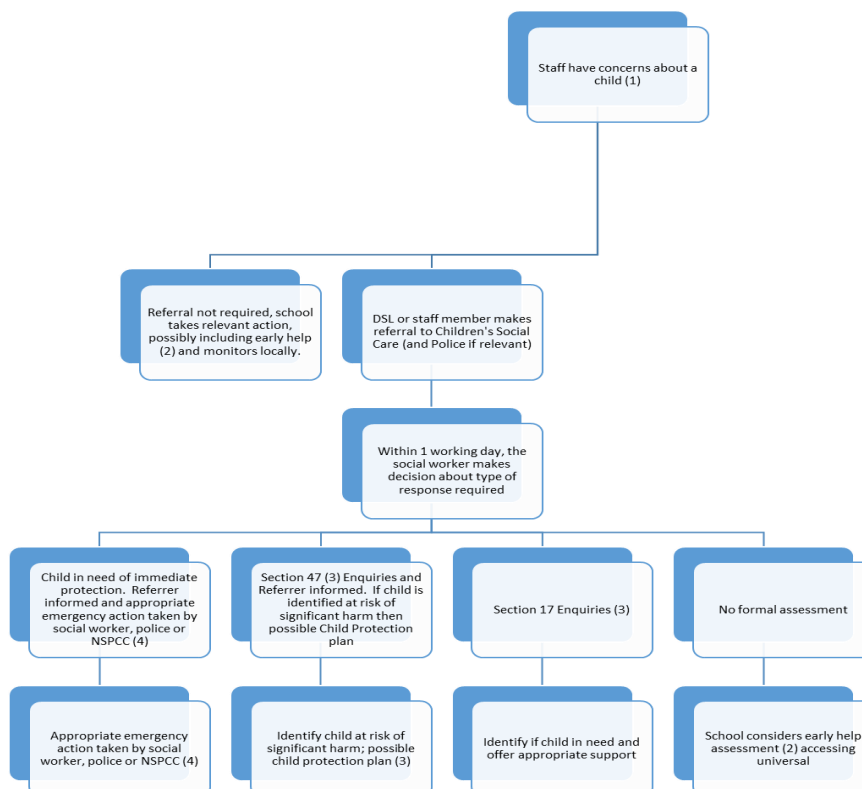
At all stages, staff should keep the child's circumstances under review, and re-refer if appropriate, to ensure the child's circumstances improve. The child's best interests must come first.

1. In cases which also involve an allegation of abuse against a staff member, see paras 4.10 to 4.14 of this guidance
2. Early help means providing support as soon as a problem emerges at any point in a child's life. Where a child would benefit from co-ordinated early help, an early help inter-agency assessment should be arranged. Chapter One of Working Together to Safeguard Children provides detailed guidance on the early help process
3. Under the Children Act 1989, local authorities are required to provide services for children in need for the purposes of safeguarding and promoting their welfare. This can include s17 assessments of children in need and S47 assessments of children at risk of significant harm. Full details are in Chapter One of Working Together to Safeguard Children
4. This could include applying for an Emergency Protection Order (EPO)

7.9 **Concerns about a staff member or volunteer**:

If you have concerns about a member of staff, supply teacher or volunteer, speak to the headteacher. If you have concerns about the headteacher, speak to the chair of governors, Angela Darnell. She can be contacted on angela.darnell.gov@framdurham.com

You can also discuss any concerns about any staff member or volunteer with the DSL.

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

7.10 **Child -on-Child Abuse**

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

- Child-on-child abuse is most likely to include, but may not be limited to:
- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between peers
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes and online sexual harassment, which may be standalone or part of a broader pattern of abuse
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party
- Consensual and non-consensual sharing of nudes and semi nudes images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm

- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

Preventing Child-on-Child Abuse:

Peer abuse can be prevented. Adults who work with children must be aware of the potential for abuse between children.

- have clear robust policies on dealing with key issues such as online bullying;
- ensure staff and students are aware of the policies;
- identify any blind spots within the school site;
- supervise and be aware of potential risky areas
- pay attention and monitor children who may be hiding in areas out of view;
- take steps to prevent isolation;
- separate children if needed;
- increase supervision during key times;
- if you suspect a child is abusing another, ensure you pass this onto the DSL/Year Teams;
- where risk is identified have a student risk assessment in place.

If staff have any concerns about Child –on-Child abuse, or a child makes a report to them, they should report this to the DSL.

7.11 Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex

- Through a group of children sexually assaulting or sexually harassing a single child or group of children

- Online and face to face (both physically and verbally)

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

If a victim reports an incident, it is essential that staff make sure they are reassured that they are being taken seriously and that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report.

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

The National Crime Agency's CEOP Education Programme provides information for those working with young people and parents and carers on how we can protect children and young people from child sexual violence and abuse.

Child-on-child sexual violence and sexual behaviours

Green Behaviours	Amber Behaviours	Red Behaviours
are part of safe and healthy sexual development which are: ▪ displayed between children or young people of similar age or developmental ability ▪ reflect curiosity, experimentation, consensual activities and positive choices ▪ 'normal' but inappropriate within the school/classroom setting	are potentially outside safe and healthy development due to: ▪ age or developmental differences ▪ activity type, frequency, duration or context	are clearly outside safe and healthy development and: ▪ involve much more coercion, secrecy, compulsion, and threats ▪ require action from school and other agencies

For further information of sexualised behaviour thresholds visit www.brook.org.uk

Staff should be aware of the importance of:

- Challenging and reporting inappropriate behaviours

- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up

- Not dismissing this kind of behaviour as 'banter' or 'just having a laugh' or 'part of growing up' or 'boys being boys'

- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts and genitalia, pulling down trousers, flicking bras and lifting up skirts. Dismissing or tolerating such behaviours risks normalising them

All staff should be aware of the signs of sexual violence and the fact children can, and sometimes do, abuse other children in this way and that it can happen both inside and outside of school. When referring to sexual violence in this advice, we do so in the context of child-on-child sexual violence. When referring to sexual violence we are referring to sexual offences under the Sexual Offences Act 2003:

Rape: A person (A) commits an offence of rape if: he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.

Assault by Penetration: A person (A) commits an offence if: s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.

Sexual Assault: A person (A) commits an offence of sexual assault if: s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents. (NOTE- All staff should be aware that sexual assault covers a very wide range of behaviour so a single act of kissing someone without consent or touching someone's bottom/breasts/genitalia without consent, can still constitute sexual assault.)

Causing someone to engage in sexual activity without consent: A person (A) commits an offence if: s/he intentionally causes another person (B) to engage in an activity, the activity is sexual, B does not consent to engaging in the activity, and A does not reasonably believe that B consents. (NOTE – this could include forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.)

Consent

All staff should understand the concept of consent. Consent is about having the freedom and capacity to choose. Consent to sexual activity may be given to one sort of sexual activity but not another, e.g.to vaginal but not anal sex or penetration with conditions, such as wearing a condom. Consent can be withdrawn at any time during sexual activity and each time activity occurs. Someone consents to vaginal, anal or oral penetration only if s/he agrees by choice to that penetration and has the freedom and capacity to make that choice.

- a child under the age of 13 can never consent to any sexual activity
- the age of consent is 16
- sexual intercourse without consent is rape.

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

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

- sexual comments, such as: telling sexual stories, making lewd comments, making sexual remarks about clothes and appearance and calling someone sexualised names
- sexual "jokes" or taunting
- physical behaviour, such as: deliberately brushing against someone, interfering with someone's clothes.

It is important to differentiate between consensual sexual activity between children of a similar age and that which involves any power imbalance, coercion or exploitation. Due to their additional training, the DOS or DSL should be involved and leading the response. If in any doubt, they should seek expert advice. If this crosses a line into sexual violence – it is important to talk to and consider the experience of the victim.

- displaying pictures, photos or drawings of a sexual nature
- upskirting (this is a criminal offence), and
- online sexual harassment.

This may be an isolated incident or part of a wider pattern of sexual harassment and/or sexual violence. It may include: consensual and non-consensual sharing of nude and semi-nude images and/or videos. Taking and sharing nude photographs of U18s is a criminal offence. (see section 7.13).

It is important that we consider sexual harassment in broad terms. Sexual harassment (as set out above) creates a culture that, if not challenged, can normalise inappropriate behaviours and provide an environment that may lead to sexual violence. Harmful sexual behaviour. Children's sexual behaviour exists on a wide continuum, ranging from normal and developmentally expected to inappropriate, problematic, abusive and violent. Problematic, abusive and violent sexual behaviour is developmentally inappropriate and may cause developmental damage. A useful umbrella term is "harmful sexual behaviour" (HSB). The term has been widely adopted in child protection and is used in this advice. HSB can occur online and/or face-to-face and can also occur simultaneously. The Voyeurism (Offences) Act 2019 which amends the Sexual Offences Act 2003 to make upskirting a specific offence of voyeurism. The Act came into force on 12 April 2019.

Consensual image sharing, especially between older children of the same age, may require a different response. It might not be abusive – but children still need to know it is illegal- whilst non-consensual is illegal and abusive. HSB should be considered in a child protection context. When considering HSB, both ages and the stages of development of the children are critical factors.
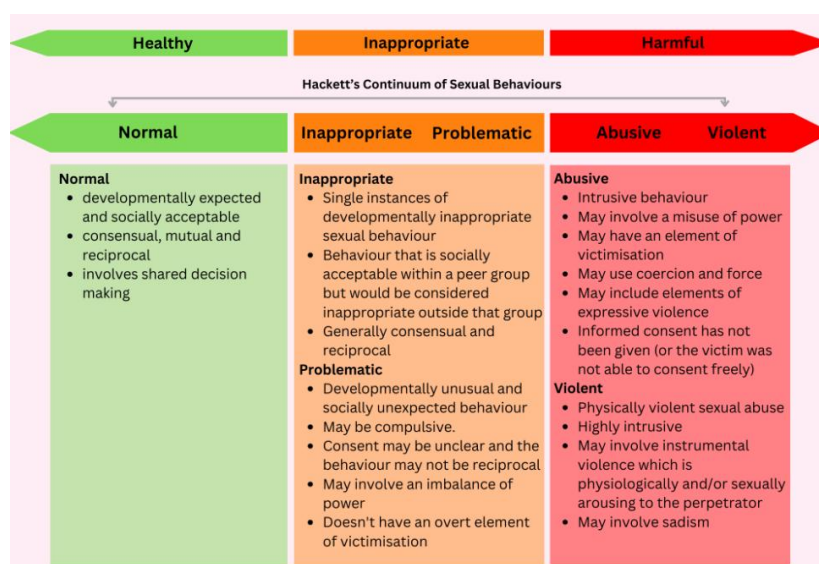
Sexual behaviour between children can be considered harmful if one of the children is much older, particularly if there is more than two years' difference or if one of the children is pre-pubescent and the other is not. However, a younger child can abuse an older child, particularly if they have power over them, for example, if the older child is disabled or smaller in stature.

It is effective safeguarding practice for the DOS/DSL's to have a good understanding of HSB. This should form part of their safeguarding training. This will aid in planning preventative education, implementing preventative measures, drafting and implementing an effective child protection policy and incorporating the approach to sexual violence and sexual harassment into schools approach to safeguarding. Addressing inappropriate behaviour can be an important intervention that helps prevent problematic, abusive and/or violent behaviour in the future. Children displaying HSB have often experienced their own abuse and trauma. It is important that this is recognised and they are offered appropriate support.

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they must report this in person to the DSL.

Hacketts Continuum (2010) presents sexualized behaviours from a range of what is 'normal' to 'inappropriate' Please see the following table for further guidance.

Further support and guidance can be found here in relation to sexual behaviour Home - Shore

Hackett's Continuum of Sexual Behaviours

Healthy	Inappropriate	Harmful
Normal	Inappropriate Problematic	Abusive Violent
Normal • developmentally expected and socially acceptable • consensual, mutual and reciprocal • involves shared decision making	**Inappropriate** • Single instances of developmentally inappropriate sexual behaviour • Behaviour that is socially acceptable within a peer group but would be considered inappropriate outside that group • Generally consensual and reciprocal **Problematic** • Developmentally unusual and socially unexpected behaviour • May be compulsive. • Consent may be unclear and the behaviour may not be reciprocal • May involve an imbalance of power • Doesn't have an overt element of victimisation	**Abusive** • Intrusive behaviour • May involve a misuse of power • May have an element of victimisation • May use coercion and force • May include elements of expressive violence • Informed consent has not been given (or the victim was not able to consent freely) **Violent** • Physically violent sexual abuse • Highly intrusive • May involve instrumental violence which is physiologically and/or sexually arousing to the perpetrator • May involve sadism

7.12   Dealing with child -on- child abuse

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

- Is serious, and potentially a criminal offence

- Could put students in the school at risk

- Is violent

- Involves students being forced to use drugs or alcohol

- Involves sexual exploitation or sexual abuse, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes as outlined previously)

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

- You must tell the DSL/relevant Pastoral Manager and record the allegation on CPOMs, but do not investigate it

- The DSL or Pastoral Manager will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence

- If necessary, the DSL or Pastoral Manager will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed

- The DSL will contact the children and adolescent mental health service (CAMHS), if appropriate

We will minimise the risk of child -on-child abuse by endeavoring to support students through:

- Challenging any form of derogatory or sexualised language or behaviour between peers, including requesting or sending sexual images

- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys

- Ensuring our curriculum helps to educate students about appropriate behaviour and consent

- Ensuring students know they can talk to staff confidentially by asking at student reception to speak with a pastoral manager, Head of Year, or Director of Safeguarding

- Ensuring that all reports are fully investigated, actions recorded on CPOMS and a package of support/risk assessment is put in place both for the victim and any alleged perpetrators

- Ensuring that students are fully informed about the process that would follow an allegation

- Utilising the curriculum to encourage self-esteem, self-motivation and self-protection

- The school ethos, which promotes a positive, supportive and secure environment and gives all students and adults a sense of bring respected and valued

- Approaches which allow students to develop critical thinking, literacy skills and digital literacy skills

- A curriculum which explores human rights, equality, democracy and tolerance and prepares students and young people fully for life in modern Britain

- A curriculum where students develop personal resilience, understand and can take appropriate risks or have personal strategies/safety plans that can allow them to manage their own safety both on and offline. This can include topics covered as part of Relationships and Sex Education, as well as Fundamental British Values

- A coherent management of Behaviour and Discipline Policy and Procedures inclusive of the Use of Reasonable Force

- Liaison with other professionals and agencies which support students and families

- A commitment to develop productive, supportive relationships with parents whenever it is in the student's best interest to do so

- The development and support of a responsive and knowledgeable staff group whose role it is to respond appropriately in all safeguarding situations

- Ensuring staff are trained to understand:
    i. How to recognise the indicators and signs of child on child abuse, and know how to identify it and respond to reports
    ii. That even if there are no reports of child on child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

iii. That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example: Children can show signs or act in ways they hope adults will notice and react to E.G A friend may make a report, a member of staff may overhear a conversation, a child's behaviour   might indicate that something is wrong

iv. That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation

v. That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

vi. The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it

vii. That they should speak to the DSL if they have any concerns

7.13 Sharing of nudes and semi-nudes

Staff responsibilities when responding to an incident

If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos and pseudo-images or imagery that is computer generated (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately. Consideration and discussion of individual concerns will also assess an adult-involved nude or semi-nude sharing incidents.

They must **not**:View, copy, print, share, store or save the imagery, or ask a student to share or download it (if they have already viewed the imagery by accident, they must report this to the DSL)

- Delete the imagery or ask the student to delete it
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers
- Say or do anything to blame or shame any young people involved
- They should explain that they need to report the incident and reassure the student(s) that they will receive support and help from the DSL.

Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

- If there is a need to contact another school, college, setting or individual

- Whether to contact parents or carers of the students involved (in most cases parents/carers should be involved)

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

- The incident involves an adult

- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)

- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent

- The imagery involves sexual acts and any student in the images or videos is under 13

- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)

- This also includes in related concerns to AI imagery or content.

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

Further review by the DSL

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

They will hold interviews with the students involved (if appropriate). If at any point in the process there is a concern that a student has been harmed or is at risk of harm, a referral will be made to children's social care and/or the police immediately.

Informing parents/carers

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

Referring to the police

If it is necessary to refer an incident to the police, this will be done through dialling 101.

Recording incidents

All incidents of sharing of nudes and semi-nudes, and the decisions made in responding to them, will be recorded on CPOMS.

Curriculum coverage

Students are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education programme. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

- What it is

- How it is most likely to be encountered

- The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment

- Issues of legality

- The risk of damage to people's feelings and

reputation Students also learn the strategies and skills

needed to manage:

- Specific requests or pressure to provide (or forward) such images
- The receipt of such images
- This policy on the sharing of nudes and semi-nudes is also shared with students so they are aware of the processes the school will follow in the event of an incident.

8.   Notifying Parents

8.1   Where appropriate, we will discuss any concerns about a child with the child's parents. The DSL or Pastoral Manager will normally do this in the event of a suspicion or disclosure. Other staff will only talk to parents about any such concerns following consultation with the DSL

8.2   If we believe that notifying the parents would increase the risk to the child, we will advise First Contact during the referral process as outlined in 7.1.

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

9.   Online Safety, Cyber Security and the use of Mobile phones and cameras

9.1   We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. To address this, our school aims to:

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

We have a Smoothwall online filtering and monitoring system on all school devices. The Director of Safeguarding works alongside the IT network manager to review the systems to safeguard students and staff. Filtering and monitoring systems are both important parts of safeguarding students and staff from potentially harmful and inappropriate online material.

In terms of cyber security we operate a primary firewall and a secondary firewall. (Cisco ASA 5508-X) The secondary firewall acts as a backup firewall which is configured to automatically take over in the event of a failure on the primary firewall. The Cisco firewalls are regularly updated with the latest firmware when released by Cisco.

The Smoothwall on premises' devices also acts as a firewall protecting all devices in school. In addition to this, a group policy was created on the school's domain controller servers to use the Windows 10 firewall system on every computer. By default the network manager has changed the default administrator password to a complex password which is regularly changed; remote access has also been disabled on the devices and cannot be accessed via the internet. The network manager checks the monitoring logs twice daily to look for suspicious activity. The firewall is configured to block unauthenticated connections. A VPN system for staff is available which is part of the Cisco firewall and can only be accessed by approved members of staff using a network username and password. The VPN system is very secure and is approved on

the network so key members of staff can work from home.

The network manager reviews the rules on a regular basis and will make amendments as when necessary. A software firewall is also in operation covering public wi-fi.

Key staff in school, the Chief Operating Officer, Network Manager and Director of Safeguarding are aware of changes in relation to Generative AI and a new policy has now been implemented as guidance to all staff. Any changes will be reviewed to meet digital and technology standards in line with DfE guidance.

Staff will receive training where appropriate in line with the Use Of Generative AI Policy, which will be regularly reviewed as part of online safety measures.

There is a Professionals Online Safety Helpline 0844 381 4772.

The 4 key categories of risk

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

- Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism
- Contact – being subjected to harmful online interaction with other users, such as child -to-child pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes
- Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and
- Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams

To meet our aims and address the risks above we will educate students about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras.
- Staff are allowed to bring their personal phones to school for their own use. Staff members need to ensure their phones have appropriate security measures as per the Staff Handbook
- Staff will not take pictures or recordings of students on their personal phones or cameras. Any photographs or recordings of students will be taken on school equipment only.
- We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school. This is outlined in our Data Protection Policy.
- Students are not allowed to have their mobile phones out on school site only Sixth

Form students are in designated areas. Teaching staff may allow students to photograph work on specific occasion, but this will be subject to close supervision and students may not take photographs of other students during this time

- Make all students, parents/carers, staff, volunteers and governors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation

- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community
- Key aspects of online safety are included in the Curriculum. This includes use of Generative AI, misinformation and disinformation, fake news and conspiracy theories.

AI In schools

At Framwellgate School, we recognise the transformative potential of Artificial Intelligence (AI) in enhancing educational experiences and operational efficiency. However, we are also acutely aware of the safeguarding risks associated with AI. In line with the "Keeping Children Safe in Education" (KCSIE) guidance, we are committed to addressing these risks to ensure the safety and well-being of our students.

Addressing Potential Safeguarding Risks of AI
- Data Privacy and Security: We understand the importance of protecting our students' personal information. Our AI systems are designed to comply with stringent data protection standards, including the General Data Protection Regulation (GDPR). We ensure that all data is securely stored and processed, with robust measures in place to prevent unauthorized access and data breaches.
- Bias and Discrimination: To prevent any form of unfair treatment, we regularly audit our AI systems to identify and mitigate biases. Our commitment to equality and inclusion means we continuously work to ensure that our AI tools treat all students fairly and without discrimination.
- Inappropriate Content: We have implemented advanced Smoothwall monitoring and filtering systems to safeguard our students from exposure to inappropriate content.
- Cyberbullying and Online Harassment: We are proactive in preventing cyberbullying and online harassment.

Linking AI Safeguarding to KCSIE

Our approach to AI safeguarding is closely aligned with the KCSIE guidance, ensuring that we meet all statutory requirements:
- Data Protection: We handle all data collected and processed by our AI systems in compliance with GDPR. This includes obtaining proper consent and ensuring transparency in how data is used and stored.
- Monitoring and Reporting: We have established clear procedures for monitoring our AI systems and reporting any safeguarding concerns. Regular audits are conducted to ensure our AI tools are functioning correctly and not exposing students to harm.
- Student Education: We educate our students about the safe and responsible use of AI technologies. This supports KCSIE's broader aim of empowering children to protect themselves from various risks, including those posed by digital technologies.

10.   Children potentially at greater risk of harm

10.1   Children may need a social worker due to safeguarding or welfare needs. Children may need

this help due to abuse, neglect and complex family circumstances. A child's experiences of adversity and trauma can leave them vulnerable to further harm, as well as educationally disadvantaged in facing barriers to attendance, learning, behaviour and mental health. Local authorities should share the fact a child has a social worker, and the Designated Safeguarding lead should hold and use this information so that decisions can be made in the best interests of the child's safety, welfare and educational outcomes. This should be considered as a matter of routine. There are clear powers to share this information under existing duties on both local authorities and schools and colleges to safeguard and promote the welfare of children

10.2   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, but especially the Designated Safeguarding Lead (and deputies) 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

10.3   The Designated Safeguarding Lead will keep a full record of concerns raised and make referrals to the First Contact Team, if necessary. These records may be either handwritten or electronic but will be stored via a secure system. The Headteacher will be kept informed at all times.

10.4   Where a child has particular vulnerabilities or an EHCP (Education Health Care Plan) the local authority will need to review the plan if an application is made for EHE (Elective Home Education).

Any applications made for EHE are reviewed by the Year Teams and Director of Safeguarding for safeguarding purposes.

10.5   Children with special educational needs, disabilities or health issues may be recognized as being more vulnerable. Students with SEND or certain health conditions can face additional safeguarding challenges. Children with disabilities are more likely to be abused than their peers. Additional barriers can exist when recognising abuse, exploitation and neglect in this group. Students with SEND may face a number of challenges with regard to cognitive understanding of safeguarding, that we must help and support them with.

10.6   The Special Educational Needs and Disabilities Support Services (SENDIASS) offer information, advice and support for parents and carers with SEND. All local authorities have a support service available: www.councilfordisabledchildren.org.uk

For further advice please also see www.learning.nspcc.org.uk

11.   Looked-after and previously looked-after children/CiC – Children in Care

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

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

We have appointed a designated teacher, Mark McCreedy, Director of Inclusion who is responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

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

As part of their role, the designated teacher will:

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

Gender questioning

We understand that everyone's journey is different and whilst we support all students in our care, we understand the complexities and challenges some of our young people may face. It's students' individual choice how they identify and who they choose to tell. Where appropriate and deemed necessary, we will take a cautious approach, involve and inform parents and carers. Any action taken by the school with regard to gender questioning will be made in the child's best interest and in accordance with specific legal duties. This includes the Supreme Court Order judgment that 'sex' means biological sex. KCSIE guidance remains under review.

12. Complaints and concerns about school safeguarding practices

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

12.2 Complaints against the safety of our premises will be dealt with as part of our complaints procedure

12.3 Whistle-blowing

There is a separate whistle-blowing policy that covers the following concerns:

i. Conduct which is an offence or a breach of law.

ii. Failure to comply with a legal obligation.

iii. Health and safety risks

iv. The unauthorised use of public funds.

v. Possible fraud and corruption

vi. Sexual, physical or other abuse

vii. Other unethical conduct.

viii. Actions which are unprofessional, inappropriate or conflict with a general understanding of what is right and wrong.

13. Record-keeping and information sharing.

13.1 All safeguarding concerns, discussions, decisions made and the reasons for those decisions, must be recorded in writing on CPOMS. If you are in any doubt about whether to record something, discuss it with the DSL. Confidential information and records will be held securely and only available to those who have a right or professional need to see them .

13.2 Safeguarding records relating to individual children will be retained for a reasonable period of

time after they have left the school, in line with the records retention schedule. Records include instances where referrals were or were not made to another agency such as local authority children's social care or the Prevent programme, etc.

13.3   All safeguarding incidents/ concerns from September 2018 are recorded on CPOMS, an electronic case management system. All staff, including support staff have access to CPOMS. Historic paper records have been archived/ disposed of in line with the retention schedule. Any other paper safeguarding records relating to existing students have been uploaded as a document file on CPOMS.

13.4   The school shares information with other agencies such as CAMHS, with parental and young person consent. Any requests for disclosure of information to the Police are made in line with legal requirements and consent forms obtained with a DP7/DP9 form. Consent to share information is not required where this may increase the risk of harm to a child. Information is also shared with the Central Inclusion Panel in managing alternative provisions and managed moves. Parental consent is obtained in respect of this.

13.5   In addition:

Appendix 2 sets out our policy on record-keeping, specifically with respect to recruitment and pre-employment checks

Appendix 4 sets out our policy on record-keeping with respect to allegations of abuse made against staff

13.6   We have an obligation to preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA) until the accused has reached normal pension age or for a period of 10 years from the date of the allegation if that is longer.

14.   Training

14.1   All staff members will undertake safeguarding and child protection training at induction, including on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse, exploitation or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being becoming involved with or supporting terrorism and to challenge extremist ideas.

Staff will also receive regular safeguarding and child protection updates (for example, through emails, briefings and staff meetings) as required, but at least annually.

Volunteers will receive appropriate training, if applicable.

14.2   The DSL and deputies will undertake child protection and safeguarding training at least every 2 years. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through e-bulletins, meeting other DSLs, or taking time to read and digest safeguarding developments). They will also undertake Prevent awareness training.

14.3   All governors receive training about safeguarding, to make sure they have the knowledge and information needed to perform their functions and understand their responsibilities.

14.4   Recruitment – interview/appointment panels.

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures. In line with Safer Recruitment and changes to KCSIE 2022 as part of shortlisting process, schools may now consider online searches as part of their due diligence on shortlisted candidates.

14.5   Staff who have contact with students and families:

All pastoral managers who have contact with children and families will have supervision to provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

15. Monitoring arrangements

This policy will be reviewed **annually** by Michele Osborne, Director of Safeguarding. At every review, it will be approved by the full governing board.

16. Links with other policies

This policy links to the following policies and procedures:

- Bullying including cyberbullying
- Children missing education Keeping Children Safe 2019 (Annex A)
- Children missing Home or care
- Child sexual exploitation – (CSE) & Keeping Children Safe 2019 (Annex A)
- Domestic Violence
- Drugs
- Fabricated or induced Illness
- Faith Abuse
- Female genital mutilation (FGM) & Keeping Children Safe 2019 (Annex A)
- Forced Marriage
- Gangs and youth violence
- Gender Based Violence/violence against Women and Girls (VAWG)
- Hate
- Mental Health
- Missing children and adult strategy
- Private fostering
- Preventing radicalisation Keeping Children Safe 2019 (Annex A)
- Relationship abuse
- Sexting new guidance from DfE
- Trafficking
- Whistle blowing and low level concerns
- Online safety
- Lockdown procedure
- The Use of Generative AI
- BYOD Policy

This Child Protection and Safeguarding Policy links with other school documentation including safer recruitment procedures as well as other Policies/Position Statements. Examples of relevant documentation include those on:

- Safer Recruitment
- Child Sexual Exploitation
- Extremism and the Prevent Strategy
- Behaviour Management (Culture for Learning) including suspensions
- Equality, Diversity and Community Cohesion
- Anti-Bullying (including cyber bullying)
- Confidentiality and information sharing
- Visits
- Access by Visitors to students
- Alternative Provision
- ICT Acceptable User
- Staff Code of Conduct

Appendices

The following appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education. All staff should be able to identify possible signs of abuse, neglect and signs of exploitation. All staff will receive a Safeguarding Training and relevant training where appropriate.

Appendix 1: Types of Abuse

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

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

- **Emotional abuse** is the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

  Emotional abuse may involve:

  - Conveying to a child that they are worthless or unloved, inadequate, or valued only insofar as they meet the needs of another person

  - Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate

  - Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction

  - Seeing or hearing the ill-treatment of another or experiencing its effects

  - Serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children

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

  o Physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing and touching outside of clothing

  o Non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (including via the internet)

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

A dedicated helpline has been set up by the NSPCC for people who have experienced sexual abuse in education. This dedicated helpline will offer support to:

- all children and young people making current and non-recent disclosures of abuse

- any children or young people who want to talk about being involved or witnessing any incidents

- any adults who have experienced non-recent abuse

- parents and carers who have any concerns about their own or other children

- professionals who work in schools and need support in this or related issues

Young people and adults can contact the NSPCC helpline, Report Abuse in Education on 0800 136 663 or email help@nspcc.org.uk

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

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

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

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

Harm can include ill treatment that is not always physical, as well as the impact of witnessing ill treatment of others. This can be particularly relevant, for example, in relation to the impact on children of all forms of domestic abuse. Children may be abused in a family or in an institutional or community setting by those known to them or more rarely by others not directly linked to them. We need to have a general increased awareness of the wider impact of domestic abuse – especially at a crucial time following the pandemic where domestic violence services saw an increase in demand as lockdown measures eased (according to the National Office for Statistics.)

Some common signs that there may be something concerning happening in a child's life include:

- unexplained changes in behaviour or personality
- becoming withdrawn and disengaged
- seeming anxious and nervous
- becoming uncharacteristically aggressive
- lacks social skills and has few friends, if any
- poor bond or relationship with a parent
- knowledge of adult issues inappropriate for their age
- running away or going missing, being late for school
- always choosing to wear clothes which cover their body
- Not wanting to go home, seeming hungry or asking others for food

This is not exhaustive but common signs which may indicate a certain level of abuse.

Appendix 2: Safer Recruitment and DBS checks – Policy and Procedures

We will record all information on the checks carried out in the school's single central record (SCR). Copies of these checks, where appropriate, will be held in individuals' personnel files. We follow requirements and best practice in retaining copies of these checks, as set out below. The Chief Operating Officer & Executive Assistant will monitor the SCR and all safer recruitment checks in line with statutory requirements.

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

This is in line with KCSIE Guidance & Safer Recruitment <u>Keeping children safe in education 2025</u>

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

<u>Advertising</u>

When advertising roles, we will make clear:

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

<u>Application forms</u>

Our application forms will:

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

<u>Shortlisting</u>

- Our shortlisting process will involve at least 2 people and will:
- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:

  Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:

  - o If they have a criminal history
  - o Whether they are included on the barred list
  - o Whether they are prohibited from teaching
  - o Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
  - o Any relevant overseas information
- Sign a declaration confirming the information they have provided is true

As part of shortlisting processes, we may conduct online searches for job candidates as part of due diligence checks.

Seeking references and checking employment history

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

When seeking references we will:

- Not accept open references

- Liaise directly with referees and verify any information contained within references with the referees

- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations. We may contact current employees of Referees to confirm their role in their place of employment.

- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed

- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children

- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate

- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

- Probe any gaps in employment, or where the candidate has changed employment or location frequently, and ask candidates to explain this

- Explore any potential areas of concern to determine the candidate's suitability to work with children

- Record all information considered and decisions made

New staff

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

- Verify their identity

- Obtain an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will record that this has been sighted, along with the certificate number and date of issue. A copy of this record will be kept in individual personnel files and the relevant information will be recorded on the Single Central Record

- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available

- Verify their mental and physical fitness to carry out their work responsibilities

- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards

- Verify their professional qualifications, as appropriate

- Ensure they are not subject to a prohibition order if they are employed to be a teacher

- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:

- For all staff, including teaching positions: criminal records checks for overseas applicants

- For teaching positions: obtaining a letter of professional standing from the professional

regulating authority in the country where the applicant has worked

- Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state
- Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Regulated activity means a person who will be:

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

Existing staff

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

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)
- Where the individual has received a caution or conviction for a relevant offence
- If there is reason to believe that the individual has committed a listed relevant offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009
- If the individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

Contractors

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

- An enhanced DBS check with barred list information for contractors engaging in regulated activity
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children
- We will obtain the DBS check for self-employed contractors.
- We will not keep copies of such checks for longer than 6 months.
- Contractors who have not had any checks will not be allowed to work unsupervised or engage in regulated activity under any circumstances.
- We will check the identity of all contractors and their staff on arrival at the school.

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity

- Obtain an enhanced DBS check without barred list information for all volunteers who are not in regulated activity, but who have an opportunity to come into contact with children on a regular basis, for example, supervised volunteers

- Carry out a risk assessment when deciding whether to seek an enhanced DBS check for any volunteers not engaging in regulated activity

Governors

- All trustees and governors will have an enhanced DBS check, barred list information and section 128 check

- The chair of the board of trustees will have their DBS check countersigned by the secretary of state.

- All trustees, proprietors and local governors will also have the following checks:

- Right to work in the UK

- Other checks deemed necessary if they have lived or worked outside the UK

A lanyard protocol is in place for all school staff and Sixth Form Students and visitors whilst on site.

Adults who supervise students on work experience

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

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

Students staying with host families

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

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

Appendix 3: Allegations of abuse made against staff

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

- Behaved in a way that has harmed a child, or may have harmed a child, or

- Possibly committed a criminal offence against or related to a child, or

- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

- Behaved or may have behaved in a way that indicates they may not be suitable to work with children

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

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

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

Suspension

Suspension will not be the default position, and will only be considered 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 it might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative.

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned

- Providing an assistant to be present when 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 have been consulted

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive

False: there is sufficient evidence to disprove the allegation

Unsubstantiated: there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)

Unfounded: to reflect cases where there is no evidence or proper basis which supports the allegation being made

Procedure for dealing with allegations

All concerns regarding a member of staff must be reported to the Headteacher immediately. Any concerns regarding the Headteacher must be reported to the Chair of Governors.

In the event of an allegation that meets the criteria above, the headteacher (or chair of governors where the headteacher is the subject of the allegation) – the 'case manager' – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. The LADO for Durham is Sharon Lewis or Louise Brookes. They can be contacted on CYPSLADOSECURE@durham.gov.uk.

- 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

- **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 consider what other support is appropriate. Support can include advice from trade union representatives, a named colleague or accessing provisions via occupational health services.

- 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 where

appropriate of the progress of the case and the outcome where appropriate, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)

- Make a referral to the DBS or Teacher Regulation Agency 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 National College for Teaching and Leadership.

Where the police are involved, wherever possible the Trust 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 and volunteers

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

- If we receive an allegation or safeguarding concern relating to an individual or organization who have used the school premises for the purpose of running activities or providing services for children we will follow our safeguarding procedures and policies and inform the LADO or police where we feel necessary. All allegations or concerns will be risk assessed by the Headteacher, Director of Safeguarding and Chief Operating Officer.

Timescales

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious will be resolved within 1 week

- If the nature of an allegation does not require formal disciplinary action, we will institute appropriate action within 3 working days

- If a disciplinary hearing is required and can be held without further investigation, we will hold this within 15 working days

Specific actions

Action following a criminal investigation or prosecution

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

Conclusion of a case where the allegation is substantiated

If the 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 case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS or Teacher Regulation Agency for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the Teacher Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension

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

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

Unsubstantiated, unfounded, false or malicious reports

If a report is:

Determined to be unsubstantiated, unfounded, false or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Unsubstantiated, unfounded, false or malicious allegations

If an allegation is:

Determined to be unsubstantiated, unfounded, false or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation is in need of help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate

Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it

Confidentiality

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 / Investigating Officer will take advice from the local authority's designated officer, Human Resources Department, 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 and/or Staff Safe System for the duration of the case. Such records will include:

- A clear and comprehensive summary of the allegation

- Details of how the allegation was followed up and resolved

- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual. We will retain these records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

References

When providing employer references, we will:

- not refer to any allegation that has been proven to be false, unsubstantiated or malicious, or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

- Include substantiated allegations, provided that the information is factual and does not include opinions

Learning lessons

After any cases where the allegations are *substantiated*, we 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

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.

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
- 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/nagging doubts

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

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

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

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

Sharing low-level concerns/nagging doubts

- 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/nagging doubts
- 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/nagging doubts

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 behaviour policy/code of conduct.

Concerns will be logged on CPOMS Staff Safe where appropriate.

Appendix 4: Specific Safeguarding Issues - Children missing or absent from education, unexplainable and/or persistent absence from education.

A child going missing or absent from education is a potential indicator of abuse or neglect, and such children are at risk of being victims of harm, exploitation or vulnerable to radicalisation.

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

- Are at risk of harm or neglect

- Come from Gypsy, Roma, or Traveller families

- Come from the families of service personnel

- Go missing or run away from home or care

- Are supervised by the youth justice system

- Cease to attend a school

- Come from new migrant families

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

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

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

Where students are absent from education for prolonged periods of time and/or on repeat occasions, we will work with local authority children's services where the absence indicates a safeguarding concern.

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child Sexual Exploitation

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status. CSE involves individual or groups taking advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity. It may involve an exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence

This can involve violent, humiliating and degrading sexual assaults, but does not always involve physical contact and can happen online. For example, young people may be persuaded or forced to share sexually explicit images of themselves, have sexual conversations by text, or take part in sexual activities using a webcam.

Children or young people who are being sexually exploited may not understand that they are being abused. They often trust their abuser and may be tricked into believing they are in a loving, consensual relationship.

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

Indicators of sexual exploitation can include a child:

- Appearing with unexplained gifts or new possessions
- Associating with other young people involved in exploitation
- Having older boyfriends or girlfriends
- Suffering from sexually transmitted infections or becoming pregnant
- Displaying inappropriate sexualised behaviour
- Suffering from changes in emotional wellbeing
- Misusing drugs and/or alcohol

- Going missing for periods of time, or regularly coming home late

- Regularly missing school or education, or not taking part in education

- Further information can be found here Preventing Child Sexual Exploitation | The Children's Society

Domestic abuse

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

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

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

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children. Domestic abuse can be psychological, physical, sexual, financial, or emotional. Children can be victims of domestic abuse. They may see, hear or experience the effects of abuse at home and/or suffer domestic abuse in their own intimate relationships (teenage relationship abuse), all of which can have a detrimental and long term impact on their health, well-being, development and ability to learn.

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

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

Homelessness

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

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

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

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

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

It is a crime to carry out any conduct the purpose of which is to cause a child to marry before their 18th birthday, even if threats, violence or any other form of coercion exists. As with the existing forced marriage law, this applies to non-binding 'unofficial' marriages as well as legal marriages.

Abuse committed in this context often involves a wider network of family or

community pressure and can include multiple perpetrators.

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

FGM

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

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

Indicators that FGM has already occurred include:

- A student confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out
- A family/student already being known to social services in relation to other safeguarding issues
- A girl:
    - Having difficulty walking, sitting or standing, or looking uncomfortable
    - Finding it hard to sit still for long periods of time (where this was not a problem previously)
    - Spending longer than normal in the bathroom or toilet due to difficulties urinating
    - Having frequent urinary, menstrual or stomach problems
    - Avoiding physical exercise or missing PE
    - Being repeatedly absent from school, or absent for a prolonged period
    - Demonstrating increased emotional and psychological needs – for example, withdrawal or depression, or significant change in behaviour
    - Being reluctant to undergo any medical examinations
    - Asking for help, but not being explicit about the problem
    - Talking about pain or discomfort between her legs
- Potential signs that a student may be at risk of FGM include:
- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin
- A parent or family member expressing concern that FGM may be carried out
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
- A girl:
    - Having a mother, older sibling or cousin who has undergone FGM
    - Having limited level of integration within UK society

- o Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"
- o Talking about a long holiday to her country of origin or another country where the practice is prevalent, or parents stating that they or a relative will take the girl out of the country for a prolonged period
- o Requesting help from a teacher or another adult because she is aware or suspects that she is at immediate risk of FGM
- o Talking about FGM in conversation – for example, a girl may tell other children about it (although it is important to take into account the context of the discussion)
- o Being unexpectedly absent from school
- o Having sections missing from her 'red book' (child health record) and/or attending a travel clinic or equivalent for vaccinations/anti-malarial medication

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

The 'One Chance' rule:

As with forced marriage (see below) there is the 'One Chance' rule. It is essential that schools and colleges take action without delay. As KCSIE now states: 'Under section 5B of the Female Genital Mutilation Act 2003 (as inserted by sect 74 of the Serious Crime Act 2015) places a statutory duty upon teachers, along with social workers and healthcare professionals, to report to the police where they discover that FGM appears to have been carried out on a girl under 18. Those falling to report such cases will face disciplinary sanctions'.

Further information: www.gov.uk/government/publications/multi-agency-statutory-guidance-on-female-genitalmutilation

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of one or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

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

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

The DSL will:

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

Preventing Radicalisation

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

Schools have a duty to prevent children becoming involved or supporting terrorism. This includes those susceptible to radicalization into terrorism. The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.

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

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

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

Staff will be alert to changes in students' behaviour.

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

- Refusal to engage with, or becoming abusive to, peers who are different from themselves

- Becoming susceptible to conspiracy theories and feelings of persecution

- Changes in friendship groups and appearance

- Rejecting activities they used to enjoy

- Converting to a new religion

- Isolating themselves from family and friends

- Talking as if from a scripted speech

- An unwillingness or inability to discuss their views

- A sudden disrespectful attitude towards others

- Increased levels of anger

- Increased secretiveness, especially around internet use

- Expressions of sympathy for extremist ideologies and groups, or justification of their actions

- Accessing extremist material online, including on Facebook or Twitter

- Possessing extremist literature

- Being in contact with extremist recruiters and joining, or seeking to join, extremist organisations

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage behaviour –staff should have confidence in their instincts and seek

advice if something feels wrong.

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including online safety.

Channel

Channel is a voluntary, confidential support programme which focuses on providing support at an early stage to people who are identified as being vulnerable to being drawn in. Prevent referrals may be passed to a multi-agency Channel panel, which will discuss the individual referred to determine whether they are vulnerable to being drawn into terrorism and consider the appropriate support required. A representative from the school or college may be asked to attend the Channel panel to help with this assessment. An individual's engagement with the programme is entirely voluntary at all stages. Children and young people can be drawn into violence or they can be exposed to the messages of extremist groups by many means. These may include through the influence of family members or friends and/or direct contact with extremist groups and organisations or, increasingly, through the internet and social media. This can put a young person at risk of being drawn into criminal activity and has the potential to cause significant harm. The risk of radicalisation is the product of a number of factors and identifying this risk requires that staff exercise their professional judgement, seeking further advice as necessary. It may be combined with other vulnerabilities or may be the only risk identified. Staff should use their judgement in identifying children who might be at risk of radicalisation and act proportionately which may include the Director of Safeguarding or Designated Safeguarding Lead's making a Prevent referral.

Further information: www.gov.uk/government/publications/prevent-duty-guidance

County Lines

County lines is a term used to describe gangs and organised criminal networks involved in exporting illegal drugs (primarily crack cocaine and heroin) into one or more importing areas [within the UK], using dedicated mobile phone lines or other form of "deal line". Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines. Criminal networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Offenders will often use coercion, intimidation, violence (including sexual violence) and weapons to ensure compliance of victims. Children can be targeted and recruited into county lines in a number of locations including schools, further and higher educational institutions, student referral units, special educational needs schools, children's homes and care homes. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for purposes of transporting drugs. A referral to the National Referral Mechanism should be considered.

Like other forms of abuse and exploitation, signs and symptoms of county line exploitation may include:

● persistently going missing from home or school
● being found out of area
● unexplained acquisition of money, clothes or mobile phone

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- excessive receipt of calls and text messages
- relationships with older, controlling individuals
- associated with gangs
- leaving home or care without explanation
- suspicion of self-harm, physical assault or unexplained injuries
- parental concerns
- significant decline in school performance
- significant changes in emotional wellbeing

Checking the identity and suitability of visitors

All visitors are expected to sign the visitors' book and wear a visitor's lanyard. This is colour coded RED. The visitor will need to be escorted at all times by a member of staff. Professional visitors who are recorded on the approved visitors list will be given a green lanyard and need not be accompanied.

If the visitor is unknown to the setting, permission to visit must be sought from the member of staff organising the visit in advance from the Headteacher. A procedure is in place for this to happen, which includes the reason for the visit and whether or not the visitor will be in regulated activity. Visitors should be ready to produce identification on arrival.

All visitors to our setting, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise students or staff.

All Framwellgate Staff must wear their staff lanyard at all times on site.

Missing students

Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child fails to attend school and no reasons are provided by parents/ carers, the school may consider carrying out a home visit, or in some circumstances, requesting a welfare check from local police. Additionally, concerns will be shared with First Contact as outlined in 7.1

Positive Handling and behaviour management:

School staff have a legal power to use force and lawful use of the power will provide a defence to any related criminal prosecution or other legal action

When can reasonable force be used?

- to prevent students from hurting themselves or others; from damaging property or from causing disorder
- to control or restrain students
- to enable staff members to use their professional judgement when deciding whether or not to physically intervene whilst taking account of individual circumstances

Schools can use reasonable force to:

- remove a disruptive student from the classroom or an activity outside of the school day, where they have refused to follow an instruction
- prevent a student behaving in a way that disrupts a school event, a school trip or visit
- prevent a student leaving the classroom where allowing them to leave would

risk their safety or lead to behaviour that disrupts the behaviour of others
- prevent a student from attacking a member of staff or another student or to stop a fight
- restrain a student at risk of harming themselves through physical outbursts.

The purpose of Permissible Forms of Restraint is:

- to restrain the student who has lost his self-control and hold him until anger passes and self-control is regained
- to alleviate the significant risk that students are exposing themselves and/or others to by being 'out of control'
- to demonstrate to the student that adults are able to support and manage what appears to be uncontrollable anger using the minimum amount of force necessary to contain the situation.
- Any use of restraint must be a completely last resort measure to de-escalate any behavioral safeguarding situation.
-

Where any reasonable force is applied by staff in school, parents and carers should be made aware at the earliest opportunity and the Director of Safeguarding, Assistant Headteacher for Behaviour and/or Headteacher must be informed immediately.

Escorts and Interventions

Key staff at Framwellgate School Durham are trained in the Team Teach method of Care & Control/Positive Handling. Team Teach aims to 'promote the least intrusive positive handling strategy and continuum of graded and gradual techniques with an emphasis and preference for the use of verbal, non-verbal de-escalation strategies being used and exhausted before Positive Handling strategies are utilised' (Team-Teach aims and course objectives).

There are a number of key staff in school who are Team Teach Trained.

Searching, Screening and Confiscation

All searching, screening and confiscation practices must be conducted in a safe, calm and supportive environment. The Headteacher and staff they authorise have the statutory power to search a student or their possessions where they have reasonable grounds to suspect a student may have a prohibited item (those listed in the Behaviour Policy). When searching or screening takes place, we must consider the age and needs of the student being searched or screened as well as reasonable grounds for conducting a search or screening. In any situations of screening or searching is to take place, two members of the same sex staff can only conduct the search and with the consent from the student to do so. The member of staff conducting the search must not require the student to remove any clothing other than outer clothing – such as a jacket or coat.   Strip searches on school premises can only be carried out by the Police.   In all instances where a search has taken place – all parents/carers must be notified. If you are unsure of any incidents where you feel a student may need to be searched or screened, contact the DOS/DSL/Year Teams immediately.

Non- collection of children

If a child is not collected by the end of the school day, we will make every effort to contact all named adults on our school systems. If we are unable to make contact to ensure the student arrives home safely or alternative arrangements are unable to be put in place, we may have to contact the Police or First Contact if we have concerns for the student.