CHILD PROTECTION POLICY

St. Nicholas School Canterbury

Designated Safeguarding Lead(s):	Stephen King (assisted by Richard Dalton, Lorna Sullivan, David Jenner & Gillian Newport and Emma Wellard, Carrie Myhill, Nuala McGill, Julie Dimech, Simon Gulliford & Tracy Baldwin and Christine Davies [CPOMS administrator])
Named Child Protection Governor:	Heidi Dawson

This is a core policy that forms part of the induction for all staff. It is a requirement that all members of staff have access to this policy and sign to say they have read and understood its contents.

This policy will be reviewed **at least** annually and/or following any updates to national and local guidance and procedures.

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SCHOOL POLICIES ON RELATED SAFEGUARDING/CHILD PROTECTION ISSUES
(to be read and followed alongside this document)

- Internet safety Policy

- Behaviour Management Policy
- Guidelines for the Use of Physical Intervention
- Procedures for Managing Allegations Against Staff
- Guidelines for Safeguarding Record Keeping in Schools
- Safeguarding Children and Child Protection - Induction Leaflet Guidelines for School Staff
- Advice notes: Dealing with Disclosures in School
- Health and Safety Policy
- Guidance for Safer Working Practice for Adults who Work with Children and Young People/Code of Conduct for Staff
- KSCB document: Safer Practice with Technology – Guidance for Adults who Work with Children and Young People
- Bullying/Anti-Bullying Procedure
- Racism/Anti-Racism Policy
- Guidance on the Use of Photographic Images
- Safer Recruitment Guidelines
- Whistle-Blowing Policy
- School Drug Policy
- Intimate Care Guidance
- Procedures for Assessing Risk (re school trips)
- First Aid and Accident Policies
- DOH (2009) "Safeguarding Disabled Children – Practice Guidance"

These documents can be found in the Deputy Headteacher's Office. They are also available to access via the school website www.st-nicholas.kent.sch.uk

This policy will be reviewed **at least** annually and/or following any updates to national and local guidance and procedures.

KEY CONTACTS

	Name	**School contact information**
Designated Safeguarding Lead (DSL)	Stephen King (DHT/DTCIC/H & S Officer)	s.king@stns.org.uk
Deputy Designated Safeguarding Leads	Daniel Lewis (HT) Lorna Sullivan (AHT) David Jenner (AHT) Gillian Newport (AHT) Emma Wellard (DMHL) Carrie Myhill (14-19 Lead) Julie Dimech (TiC Chartham Satellite) Nuala McGill (TiC Canterbury Primary Satellite) Tracy Baldwin (TiC Spires Academy Satellite) Simon Gulliford (TiC Canterbury Academy Satellite) Christine Davies (Admin/CPOMS system admin)	d.lewis@stns.org.uk l.sullivan@stns.org.uk d.jenner@stns.org.uk g.newport@stns.org.uk e.wellard@stns.org.uk c.myhill@stns.org.uk j.dimech@stns.org.uk n.mcgill@stns.org.uk t.baldwin@stns.org.uk s.gulliford@stns.org.uk c.davies@stns.org.uk
Headteacher	Richard Dalton	headteacher@stns.org.uk
Safeguarding Governor	Heidi Dawson	h.dawson@stns.org.uk
Other key staff	Kenneth Woods (Site Manager/Health & Safety Lead) Sam Thorogood (School Nurse)	k.woods@stns.org.uk schoolnurse@stns.org.uk

What to do if you have a welfare concern in St Nicholas School

Why are you concerned?

For example

- Something a child has said – e.g. allegation of harm
- Child's appearance – may include unexplained marks as well as dress
- Behaviour change
- Witnessed concerning behaviour

Act immediately and record your concerns. If urgent, speak to a DSL first.

Follow the school procedure:

- Reassure the child
- Clarify concerns, using open questions if necessary (**TED**: **T**ell, **E**xplain, **D**escribe)
- Use child's own words, record facts not opinions.
- Sign and date your records
- Seek support for yourself if required from DSL (Stephen King)

Inform the Designated Safeguarding Lead (Stephen King, s.king@stns.org.uk)

Designated Safeguarding Lead

- Consider whether the child is at immediate risk of harm e.g. unsafe to go home
- Access the Kent Safeguarding Support Level Guidance document and procedures: www.kscmp.org.uk
- Refer to other agencies as appropriate e.g. Internal or community services, early help open access, LADO, Police or Request for Support for integrated children's services
- If unsure then consult with Area Education Safeguarding Advisor (03000 418503) or Local Authority Social Worker at the Front Door.

If you are unhappy with the response

Staff:

- Follow local escalation procedures
- Follow whistleblowing procedures

Learners and Parents:

- Follow school complaints procedures (https://st-nicholas.kent.sch.uk/Information/policies?

Record decision making and action taken in the learner's child protection file

Monitor

Be clear about:

- What you are monitoring e.g. behaviour trends, appearance etc.
- How long you will monitor
- Where, how and to whom you will feedback and how you will record

Review and **request further support** if necessary

At all stages, the child's circumstances will be kept under review
The DSL/Staff will request further support if required to ensure the **child's safety** is **paramount**

1. CHILD FOCUSED APPROACH TO SAFEGUARDING

1.1. Introduction

- St Nicholas School recognises our statutory responsibility to safeguard and promote the welfare of all children. Safeguarding is everybody's responsibility and all those directly connected (staff, volunteers, governors, leaders, parents, families, and learners) are an important part of the wider safeguarding system for children and have an essential role to play in making this community safe and secure.
- St Nicholas School believes that the best interests of children always come first All children (defined as those up to the age of 18) have a right to be heard and to have their wishes and feelings taken into account and all children regardless of age, gender, ability, culture, race, language, religion or sexual identity, have equal rights to protection.
- Staff working with children at St Nicholas School will maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff will always act in the best interests of the child and if any member of our community has a safeguarding concern about any child or adult, they should act and act immediately.
- St Nicholas School recognises the importance of providing an ethos and environment within school that will help children to be safe and to feel safe. In our school children are respected and are encouraged to talk openly. We will ensure children's wishes and feelings are taken into account when determining what safeguarding action to take and what services to provide.
- Our core safeguarding principles are:
    - **Prevention**
        - positive, supportive, safe culture, curriculum and pastoral opportunities for children, safer recruitment procedures.
    - **Protection**
        - following the agreed procedures, ensuring all staff are trained and supported to recognise and respond appropriately and sensitively to safeguarding concerns.
    - **Support**
        - for all learners, parents and staff, and where appropriate specific interventions are required for those who may be at risk of harm.
    - **Working with parents and other agencies**
        - to ensure timely, appropriate communications and actions are undertaken when safeguarding concerns arise.
- The procedures contained in this policy apply to all staff, including and governors, temporary or third-party agency staff and volunteers) and are consistent with those outlined within KCSIE 2022.

1.2. Policy Context (including Legislation and Statutory Guidance)

- This policy is implemented in accordance with our compliance with the statutory guidance from the Department for Education, 'Keeping Children Safe in Education' 2022 (KCSIE) which requires individual schools and colleges to have an effective child protection policy.
- This policy has been developed in accordance with the principles established by the Children Acts 1989 and 2004 and related guidance. This includes but is not limited to:
    - Keeping Children Safe in Education 2022 (KCSIE)
    - Working Together to Safeguard Children 2018 (WTSC)
    - Ofsted: Education Inspection Framework' 2022
    - Framework for the Assessment of Children in Need and their Families 2000
    - Kent and Medway Safeguarding Children Procedures
    - Early Years and Foundation Stage Framework 2022 (EYFS)

- The Education Act 2002
- Education and Inspections Act 2006
- The Education (Independent School Standards) Regulations 2014
- The Non-Maintained Special Schools (England) Regulations 2015

- Section 175 of the Education Act 2002 requires school governing bodies, local education authorities and further education institutions to make arrangements to safeguard and promote the welfare of all children who are pupils at a school, or who are students under 18 years of age. Such arrangements will have to have regard to any guidance issued by the Secretary of State.
- St Nicholas School is currently operating in response to coronavirus (Covid-19), however, our safeguarding principles, remain the same. We will continue to follow government guidance and will amend this policy and our approaches, as necessary.
    - As a result of the Covid-19 pandemic some members of our community may have been exposed to a range of adversity and trauma including bereavement, anxiety and in some cases increased welfare and safeguarding risks. We will work with local services, such as health and the local authority, to ensure necessary support is in place.

1.3. **Definition of Safeguarding**

- In line with KCSIE 2022, safeguarding and promoting the welfare of children is defined for the purposes of this policy as:
    - protecting children from maltreatment
    - preventing impairment of children's mental and physical health or development
    - ensuring that children grow up in circumstances consistent with the provision of safe and effective care, and
    - taking action to enable all children to have the best outcomes.
- The school acknowledges that safeguarding includes a wide range of specific issues including (but not limited to):
    - Abuse and neglect
    - Bullying, including cyberbullying
    - Children with family members in prison
    - Children Missing Education (CME)
    - Child missing from home or care
    - Child Sexual Exploitation (CSE)
    - Child Criminal Exploitation (CCE)
    - Contextual safeguarding (risks outside the family home)
    - County lines and gangs
    - Domestic abuse
    - Drugs and alcohol misuse
    - Fabricated or induced illness
    - Faith abuse
    - Gender based abuse and violence against women and girls
    - Hate
    - Homelessness
    - Human trafficking and modern slavery
    - Mental health
    - Nude or semi-nude image sharing, aka youth produced/involved sexual imagery or "Sexting"
    - Internet safety
    - Peer on peer abuse

- Preventing radicalisation and extremism
- Private fostering
- Relationship abuse
- Serious violence
- Sexual violence and sexual harassment
- So-called 'honour-based' abuse, including Female Genital Mutilation (FGM) and forced marriage
- Upskirting

(Also see Part One and Annex B within 'Keeping Children Safe in Education' 2022)

GLOSSARY OF TERMS

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

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

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

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

Children includes everyone under the age of 18.

The following three **safeguarding partners** are identified in Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim, or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with.

Alleged perpetrator(s) and **perpetrator(s)** are widely used and recognised terms. However, we will think carefully about what terminology we use (especially in front of children) as, in some cases, abusive behaviour can be harmful to the perpetrator too. We will decide what's appropriate and which terms to use on a case-by-case basis.

1.4. Related Safeguarding Policies

- This policy is one of a series in the school integrated safeguarding portfolio and should be read and actioned in conjunction with the policies as listed below:
    - Positive Behaviour Support (Behaviour management and use of physical intervention)
    - Staff code of conduct
    - Searching, screening and confiscation
    - Internet safety
    - Anti-bullying
    - Data protection and information sharing
    - Relationship and Sex Education (RSE)
    - Personal and intimate care
    - Health and safety, including plans for school reopening

- Attendance
- Risk assessments (e.g. school trips, use of technology, school re-opening)
- First aid and accidents
- Managing allegations against staff
- Staff code of conduct, including Acceptable Use of Technology Policies (AUP)
- Safer recruitment
- Whistleblowing

1.5. Policy Compliance, Monitoring and Review

- St Nicholas School will review this policy at least annually (as a minimum) and will update it as needed, so that it is kept up to date with safeguarding issues as they emerge and evolve, including lessons learnt. The policy will also be revised following any national or local updates, significant local or national safeguarding events and/or learning, and/or any changes to our own procedures.

- All staff (including temporary staff and volunteers) will be provided with a copy of this policy and Part One and/or Annex A of KCSIE 2022 as appropriate. These can be found in the staffroom and staff handbook e.g. staff room, intranet, website.

- Parents/carers can obtain a copy of the school Child Protection Policy and other related policies on request Additionally, our policies can be viewed via the school website: https://st-nicholas.kent.sch.uk/Information/policies.

- The policy forms part of our school development plan and will be reviewed annually by the governing body who has responsibility for oversight of safeguarding and child protection systems.

- The Designated Safeguarding Lead and headteacher will ensure regular reporting on safeguarding activity and systems to the governing body/leadership. The governing body/leadership will not receive details of individual learner situations or identifying features of families as part of their oversight responsibility.

1.6. Equality Statement

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.

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities or health conditions (see section 10)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are looked after or previously looked after (see section 12)

- Are missing from education
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

2. KEY RESPONSIBILITIES

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

The school plays a crucial role in preventative education. This is in the context of a whole-school approach to preparing pupils for life in modern Britain, and a culture of zero tolerance of sexism, misogyny/misandry, homophobia, biphobia and sexual violence/harassment. This will be underpinned by our:

- Behaviour policy
- Pastoral support system
- Planned programme of relationships, sex and health education (RSHE), which is inclusive and delivered regularly, tackling issues such as:
    - Healthy and respectful relationships
    - Boundaries and consent
    - Stereotyping, prejudice and equality
    - Body confidence and self-esteem
    - How to recognise an abusive relationship (including coercive and controlling behaviour)
    - The concepts of, and laws relating to, sexual consent, sexual exploitation, abuse, grooming, coercion, harassment, rape, domestic abuse, so-called honour-based violence such as forced marriage and female genital mutilation (FGM) and how to access support
    - What constitutes sexual harassment and sexual violence and why they're always unacceptable

2.1. Governance and Leadership

The governing board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL
- Make sure:
    - The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support
    - Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies

- The leadership team and relevant staff are aware of and understand the IT filters and monitoring systems in place, manage them effectively and know how to escalate concerns
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers and contractors). Appendix 3 of this policy covers this procedure
- That this policy reflects that children with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised

- Where another body is providing services or activities (regardless of whether or not the children who attend these services/activities are children on the school roll):
  - Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place, and inspect them if needed
  - Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
  - Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply

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

All governors will read Keeping Children Safe in Education 2022, **in its entirety.**

Section 15 of this policy has information on how governors are supported to fulfil their role.

2.2. Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Stephen King (Deputy Headteacher). The DSL takes lead responsibility for child protection and wider safeguarding in the school. During term time, the DSL will be available during school hours for staff to discuss any safeguarding concerns. They may be contacted out of school hours by email of by their work-supplied mobile phone – 07754 749691.

The DSL has overall responsibility for the day-to-day oversight of safeguarding and child protection systems (including internet safety) in school. Whilst the activities of the DSL may be delegated to the deputies, the ultimate lead responsibility for safeguarding and child protection remains with the DSL and this responsibility will not be delegated.

The school has also appointed Deputy DSLs who will have delegated responsibilities and act in the DSLs absence:

- Richard Dalton (HT)
- Lorna Sullivan (AHT)
- David Jenner (AHT)
- Gillian Newport (AHT)
- Emma Wellard (DMHL)
- Carrie Myhill (14-19 Lead)
- Nuala McGill (T-i-C Canterbury Primary Satellite)
- Tracy Baldwin (T-i-C Spires Academy Satellite)
- Simon Gulliford (T-i-C Canterbury Academy Satellite)
- Julie Dimech (T-i-C Chartham Satellite)
- Christine Davies (Admin/CPOMS system Administrator)

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

- Provide advice and support to other staff on child welfare and child protection matters
- Take part in strategy discussions and inter-agency meetings and/or support other staff to do so
- Contribute to the assessment of children
- Refer suspected cases, as appropriate, to the relevant body (local authority children's social care, Channel programme, Disclosure and Barring Service, and/or police), and support staff who make such referrals directly
- Have a good understanding of harmful sexual behaviour

The DSL will:

- Keep the headteacher informed of any issues
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate
- Discuss the local response to sexual violence and sexual harassment with police and local authority children's social care colleagues to prepare the school's policies
- Be confident that they know what local specialist support is available to support all children involved (including victims and alleged perpetrators) in sexual violence and sexual harassment, and be confident as to how to access this support
- Be aware that children must have an 'appropriate adult' to support and help them in the case of a police investigation or search

It is the role of the DSL to carry out their functions as identified in Annex C of KCSIE 2022. This includes but is not limited to:

- Acting as the central contact point for all staff to discuss any safeguarding concerns
- Maintaining a confidential recording system for safeguarding and child protection concerns
- Coordinating safeguarding action for individual children
    - When supporting children with a social worker or looked after children the DSL should have the details of the child's social worker and the name of the virtual school head in the authority that looks after the child (with the DSL liaising closely with the designated teacher)
- Liaising with other agencies and professionals in line with KCSIE 2022 and WTSC 2018
- Ensuring that locally established procedures as put in place by the three safeguarding partners as part of the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP), including referrals, are followed, as necessary.
- Representing, or ensure the school is appropriately represented at multi-agency safeguarding meetings (including child protection conferences)
- Managing and monitoring the school role in any multi-agency plan for a child.
    - Being available during term time (during school hours) for staff in the school to discuss any safeguarding concerns.
    - Helping promote educational outcomes by sharing the information about the welfare, safeguarding and child protection issues that children, including children with a social worker, are experiencing, or have experienced, with teachers and school leadership staff.
    - Ensuring adequate and appropriate DSL cover arrangements in response to any closures and out of hours and/or out of term activities.
    - Ensuring all staff access appropriate safeguarding training and relevant updates in line with the recommendations within KCSIE.
    - Informing the headteacher of any significant safeguarding issues.

The DSL will undergo appropriate and specific training to provide them with the knowledge and skills required to carry out their role. Deputy DSLs will be trained to the same standard as the DSL. The DSLs training will be updated formally at least every two years, but their knowledge and skills will be updated through a variety of methods at regular intervals and at least annually.

2.3. Members of Staff

- All members of staff have a responsibility to:
  - Provide a safe environment in which children can learn.
  - Be aware of the indicators of abuse and neglect so that they can identify cases of children who may need help or protection.
  - Know what to do if a child tells them that he or she is being abused or neglected and understand the impact abuse and neglect can have upon a child.
  - Be able to identify and act upon indicators that children are, or at risk of developing mental health issues.
  - Be prepared to identify children who may benefit from early help.
  - Understand the early help process and their role in it.
  - Understand the school safeguarding policies and systems.
  - Undertake regular and appropriate training which is regularly updated.
  - Be aware of the local process of making referrals to children's social care and statutory assessment under the Children Act 1989.
  - Know how to maintain an appropriate level of confidentiality.
  - Reassure children who report concerns that they are being taken seriously and that they will be supported and kept safe.

All staff will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance
- Reinforce the importance of online safety when communicating with parents. This includes making parents aware of what we ask children to do online (e.g. sites they need to visit or who they'll be interacting with online)
- Provide a safe space for pupils who are LGBT to speak out and share their concerns

All staff will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct], the role and identity of the designated safeguarding lead (DSL) and deputies, the behaviour policy: the internet safety policy and the safeguarding response to children who go missing from education
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe
- The fact that children can be at risk of harm inside and outside of their home, at school and online
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans (LGBT) can be targeted by other children
- What to look for to identify children who need help or protection

2.6 The Headteacher

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

- Ensuring that staff (including temporary staff) and volunteers:
    - Are informed of our systems which support safeguarding, including this policy, as part of their induction
    - Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Making decisions regarding all low-level concerns, though they may wish to collaborate with the DSL on this
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

2.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment and progress of pupils with a social worker.
They should also identify and engage with key professionals, e.g. DSLs, SENCOs, social workers, mental health leads and others.

2.6. Children and Young People

- Children and young people (learners) have a right to:
    - Feel safe, be listened to, and have their wishes and feelings taken into account.
    - Confidently report abuse, knowing their concerns will be treated seriously, and knowing they can safely express their views and give feedback.
    - Contribute to the development of school safeguarding policies.
    - Receive help from a trusted adult.
    - Learn how to keep themselves safe, including online.

2.7. Parents and Carers

- Parents/carers have a responsibility to:
    - Understand and adhere the relevant school policies and procedures.

- Talk to their children about safeguarding issues with their children and support the school in their safeguarding approaches.
- Identify behaviours which could indicate that their child is at risk of harm including online.
- Seek help and support from the school or other agencies.

3. CHILD PROTECTION PROCEDURES

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)".

3.1 If a Child is Suffering or Likely to Suffer Harm, or in Immediate Danger

Make a referral to children's social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or is in immediate danger. **Anyone can make a referral.**
Tell the DSL (see section 5.2) as soon as possible if you make a referral directly.
Set out your local procedures for making a referral, as per the arrangements put in place by the three safeguarding partners.
You might also include the following link to the GOV.UK webpage for reporting child abuse to your local council: https://www.gov.uk/report-child-abuse-to-local-council

3.2 If a Child Makes a Disclosure to You

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

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

Bear in mind that some children may:

- Not feel ready, or know how to tell someone that they are being abused, exploited or neglected
- Not recognise their experiences as harmful
- Feel embarrassed, humiliated or threatened. This could be due to their vulnerability, disability, sexual orientation and/or language barriers

None of this should stop you from having a 'professional curiosity' and speaking to the DSL if you have concerns about a child.

3.3 If You Discover That FGM Has Taken Place or a Pupil is at Risk of FGM

Keeping Children Safe in Education explains that FGM comprises "all procedures involving partial or total removal of the external female genitalia, or other injury to the female genital organs".
FGM is illegal in the UK and a form of child abuse with long-lasting, harmful consequences. It is also known as 'female genital cutting', 'circumcision' or 'initiation'.
Possible indicators that a pupil has already been subjected to FGM, and factors that suggest a pupil may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.
Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

Any other member of staff who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures.
The duty for teachers mentioned above does not apply in cases where a pupil is *at risk* of FGM or FGM is suspected but is not known to have been carried out. Staff should not examine pupils.
Any member of staff who suspects a pupil is *at risk* of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM should speak to the DSL and follow our local safeguarding procedures.

3.4 If You Have Concerns About a Child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)
Figure 1 below, before section 7.7, illustrates the procedure to follow if you have any concerns about a child's welfare.
Where possible, speak to the DSL first to agree a course of action.
If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.
Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

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

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.
The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.
The local authority will make a decision within 1 working day of a referral about what course of action to take and will let the person who made the referral know the outcome. The DSL or person

who made the referral must follow up with the local authority if this information is not made available, and ensure outcomes are properly recorded.

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

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include *Channel*, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.

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

In an emergency, call 999 or the confidential anti-terrorist hotline on 0800 789 321 if you:
- Think someone is in immediate danger
- Think someone may be planning to travel to join an extremist group
- See or hear something that may be terrorist-related

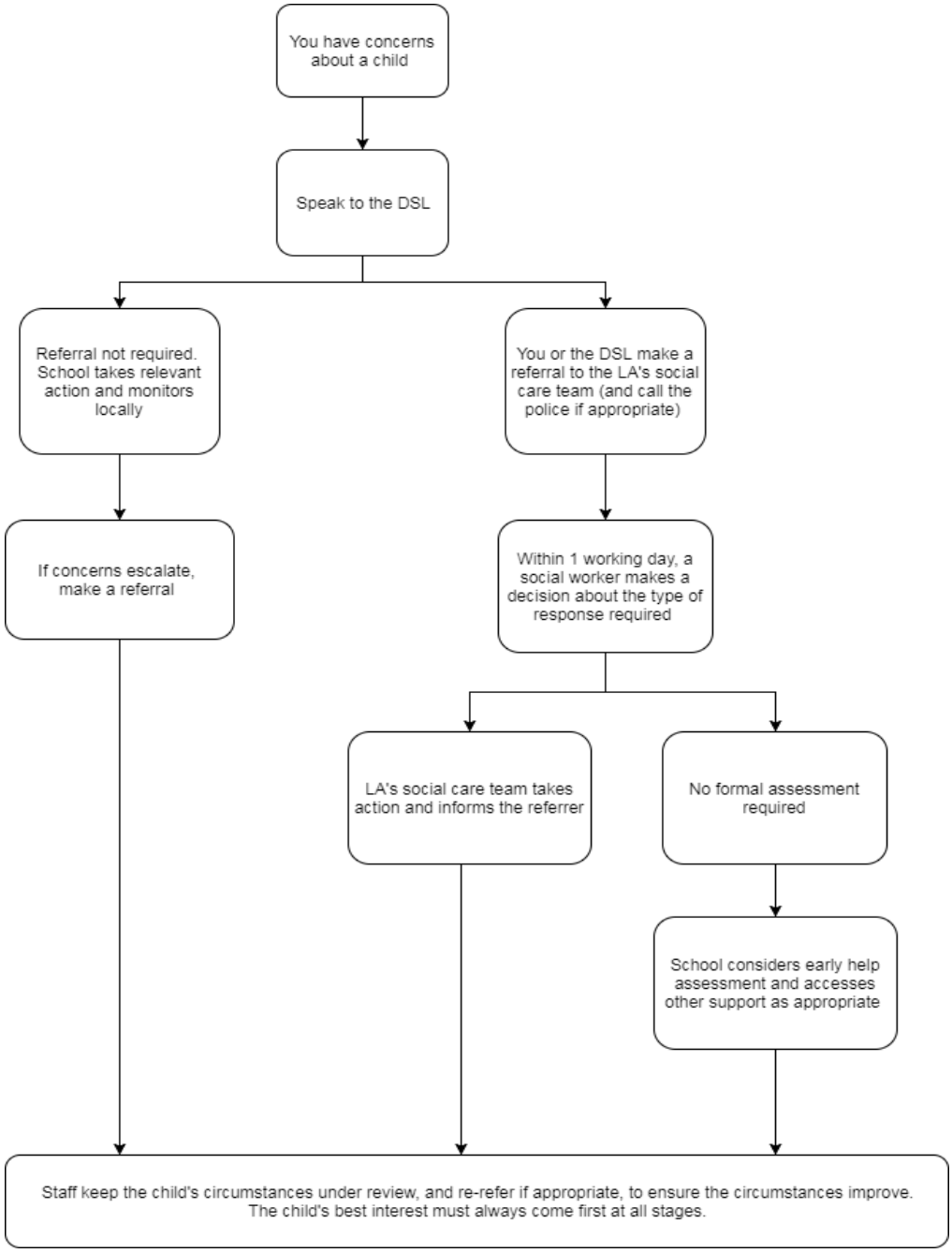
3.6 If You Have a Mental Health Concern
Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.
If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

Any concerns over a Mental Health Need for a pupil should be made on CPOMS and assigned to the DSL or Designated Mental Health Lead.

Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger)
If the DSL is unavailable, this should not delay action. See section 7.4 for what to do.



3.7 Concerns About a Staff Member, Supply Teacher, Volunteer or Contractor

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

- The headteacher/chair of governors will then follow the procedures set out in appendix 3, if appropriate.
- The headteacher/proprietor will then follow the procedures set out in appendix 3, if appropriate.
- If the concerns/allegations are about the headteacher, speak to the local authority designated officer (LADO).

- Where you believe there is a conflict of interest in reporting a concern or allegation about a member of staff (including a supply teacher, volunteer or contractor) to the headteacher, report it directly to the local authority designated officer (LADO).
- Where appropriate, the school will inform Ofsted of the allegation and actions taken, within the necessary timescale (see appendix 3 for more detail).

3.8 Allegations of Abuse Made Against Other Pupils

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

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

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

- Is serious, and potentially a criminal offence
- Could put pupils in the school at risk
- Is violent
- Involves pupils being forced to use drugs or alcohol
- Involves sexual exploitation, sexual abuse or sexual harassment, such as indecent exposure, sexual assault, upskirting or sexually inappropriate pictures or videos (including the sharing of nudes and semi-nudes)

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

Procedures for dealing with allegations of child-on-child abuse

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

- You must record the allegation and tell the DSL, but do not investigate it
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

If the incident is a criminal offence and there are delays in the criminal process, the DSL will work closely with the police (and other agencies as required) while protecting children and/or taking any disciplinary measures against the alleged perpetrator. We will ask the police if we have any questions about the investigation.

Please see the school policy for managing allegations against school staff.

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

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

To achieve this, we will:

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

- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensure our curriculum helps to educate pupils about appropriate behaviour and consent
- Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)
- Ensure staff reassure victims that they are being taken seriously
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed
- Consider intra familial harms and any necessary support for siblings following a report of sexual violence and/or harassment
- Ensure staff are trained to understand:
    - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
    - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"
    - That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
        - Children can show signs or act in ways they hope adults will notice and react to
        - A friend may make a report
        - A member of staff may overhear a conversation
        - A child's behaviour might indicate that something is wrong
    - That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
    - That a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
    - The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
    - That they should speak to the DSL if they have any concerns
    - That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s) and friends from either side

The DSL will take the lead role in any disciplining of the alleged perpetrator(s). We will provide support at the same time as taking any disciplinary action.

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident doesn't (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly. We will consider these matters on a case-by-case basis, taking into account whether:

- Taking action would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or LA children's social care to determine this

- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing

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. Amend or add to this as applicable to reflect your own approach.

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

Concerns may arise through, for example:

- Suspicion
- Complaint
- Safeguarding concern or allegation from another member of staff
- Disclosure made by a child, parent or other adult within or outside the school
- Pre-employment vetting checks

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

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
- Humiliating pupils

Responding to low-level concerns

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

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

The headteacher will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's staff code of conduct. The headteacher will be the ultimate decision-maker in respect of all low-level concerns, though they may wish to collaborate with the DSL.

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

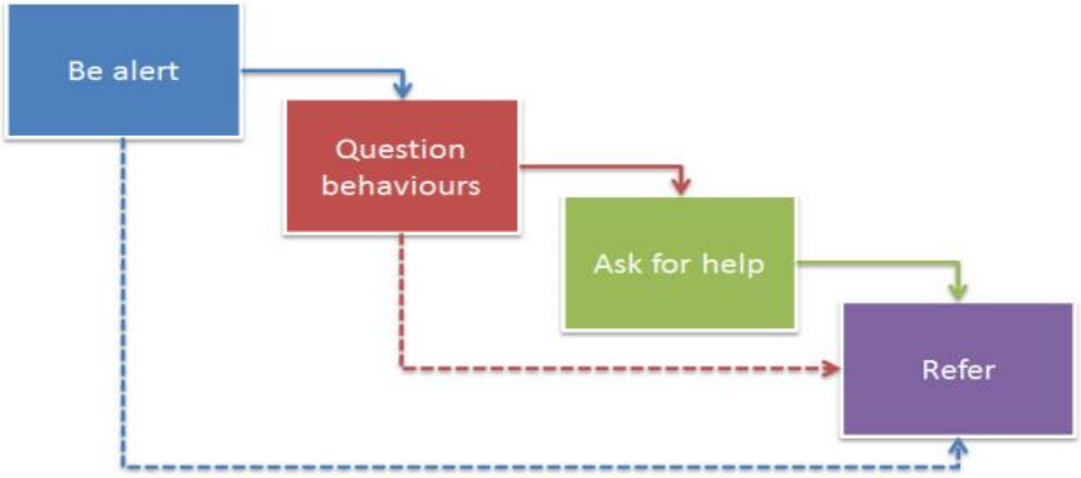
Records will be:
- Kept confidential, held securely and comply with the DPA 2018 and UK GDPR
- Reviewed so that potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern of such behaviour is identified, we will decide on a course of action, either through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

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

References
We will not include low-level concerns in references unless:
- The concern (or group of concerns) has met the threshold for referral to the designated officer at the local authority and is found to be substantiated; and/or
- The concern (or group of concerns) relates to issues which would ordinarily be included in a reference, such as misconduct or poor performance

3.9 Recognising Indicators of Abuse and Neglect
- All staff are made aware of the definitions and indicators of abuse and neglect as identified by Working Together to Safeguard Children (2018) and Keeping Children Safe in Education 2022. This is outlined locally within the Kent Support Levels Guidance.
- St Nicholas School recognise that when assessing whether a child may be suffering actual or potential harm there are four categories of abuse:
    - Physical abuse
    - Sexual abuse
    - Emotional abuse
    - Neglect
        - For further information see Appendix 1.
- St Nicholas School recognises that concerns may arise in many different contexts and can vary greatly in terms of their nature and seriousness. The indicators of child abuse and neglect can vary from child to child. Children develop and mature at different rates, so what appears to be worrying behaviour for a younger child might be normal for an older child. It is important to recognise that indicators of abuse and neglect do not automatically mean a child is being abused however all concerns should be taken seriously and will be explored by the DSL on a case-by-case basis.
- St Nicholas School recognises abuse, neglect, and safeguarding issues are rarely standalone events and cannot always be covered by one definition or one label alone. In many cases, multiple issues will overlap with one another, therefore staff will always be vigilant and always raise concerns with a DSL.
- Parental behaviors can indicate child abuse or neglect, so staff will be alert to parent-child interactions or concerning parental behaviours; this could include parents who are under the influence of drugs or alcohol or if there is a sudden change in their mental health.

- Children may report abuse happening to themselves, their peers or their family members. All reports made by children to staff will be taken seriously and will be responded to in line with this policy.
- Safeguarding incidents and/or behaviours can be associated with factors and risks outside the School. Children can be 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, sexual abuse, serious youth violence and county lines.
- Technology can be a significant component in many safeguarding and wellbeing issues. Children are at risk of abuse online as well as face to face and in many cases, abuse will take place concurrently via online channels and in daily life. Children can also abuse their peers online.
- By understanding the indicators or abuse and neglect, we can respond to problems as early as possible and provide the right support and services for the child and their family.
- All members of staff are expected to be aware of and follow this approach if they are concerned about a child:



'**What to do if you are worried a child is being abused**' 2015

- In all cases, if staff are unsure, they will always speak to the DSL (or deputy).
- St Nicholas School recognises that some children have additional or complex needs and may require access to intensive or specialist services to support them.
- If deemed necessary by the headteacher or by staff authorised by the headteacher following a concern about a child's safety or welfare, the searching and screening of children and confiscation of any items, including electronic devices, will be managed in line with the school behaviour policy, which is informed by the DfE Searching, screening and confiscation at school guidance.

3.10. **Responding to Child Protection Concerns**

- If staff are made aware of a child protection concern, they are expected to:
  - listen carefully to the concern and be non-judgmental.
  - only use open questions to clarify information where necessary, e.g. who, what, where, when or Tell, Explain, Describe (TED).

    - not promise confidentiality as concerns will have to be shared further, for example, with the DSL and potentially Integrated Children's Services.
    - be clear about boundaries and how the report will be progressed.
    - record the concern in line with school record keeping requirements.
    - inform the DSL (or deputy), as soon as practically possible.
- The DSL or a deputy should always be available to discuss safeguarding concerns. If in exceptional circumstances, a DSL is not available, this should not delay appropriate action being taken. Staff should speak to a member of the senior leadership team and/or take advice from Education Safeguarding Service or via consultation with a social worker from the Front Door. In these circumstances, any action taken will be shared with a DSL as soon as is practically possible.
- St Nicholas School will respond to concerns in line with the Kent Safeguarding Children Multi-Agency Partnership procedures (KSCMP).
    - The full KSCMP procedures and additional guidance relating to reporting concerns and specific safeguarding issues can be found on their website: www.kscmp.org.uk
    - Specific information and guidance to follow with regards to accessing Early Help and Preventative Services and/or Children's Social Work Services as part of Integrated Children's Services (ICS) in Kent can be found here: www.kelsi.org.uk/support-for-children-and-young-people/integrated-childrens-services
- Where a child is suffering, or is likely to suffer from harm, or is in immediate danger, a 'request for support' will be made immediately to Integrated Children's Services (via the 'Front Door') and/or the police, in line with KSCMP procedures.
    - St Nicholas School recognise that in situations where there are immediate child protection concerns for a child as identified in line with Support Level Guidance, it is NOT to investigate as a single agency, but to act in line with KSCMP guidance which may involve multi-agency decision making.
    - The DSL may seek advice or guidance from their Area Education Safeguarding Advisor from the Education Safeguarding Service before deciding next steps.
    - They may also seek advice or guidance from a social worker at the Front Door service who are the first point of contact for Integrated Children's Services (ICS).
- In the event of a request for support to the Front Door being necessary, parents/carers will be informed and consent to this will be sought by the DSL in line with guidance provided by KSCMP and ICS. Parents/carers will be informed of this, unless there is a valid reason not to do so, for example, if to do so would put a child at risk of harm or would undermine a criminal investigation.
- All staff are aware of the process for making request for support referrals for statutory assessments under the Children Act 1989, along with the role they might be expected to play in such assessments.
- Where is it is identified a child may benefit from Early Help support (as provided by ICS) , the

  DSL (or deputy) will generally lead as appropriate and make a request for support via the Front Door.
    - The DSL will keep all early help cases under constant review and consideration will be given to escalating concerns to the Front Door or seeking advice via the Education Safeguarding Service if the situation does not appear to be improving or is getting worse.
- If, after a request for support or any other planned external intervention, a child's situation does not appear to be improving or there is a concern regarding decisions made, the DSL will consider following **KSCMP escalation procedures** to ensure their concerns have been addressed and, most importantly, that the child's situation improves. DSLs may request support with this via the Education Safeguarding Service.

- St Nicholas School is an **Operation Encompass School**. This means we work in partnership with Kent Police to provide support to children experiencing domestic abuse.

3.11. Recording Concerns

- All safeguarding concerns, discussions and decisions, and reasons for those decisions, will be recorded in writing on the school safeguarding (and behavioural) incident system "CPOMS" and passed without delay to the DSL.
- Incident/Welfare concern forms are kept **on the school CPOMS system or (pre)school offices.**
- Records will be completed as soon as possible after the incident/event, using the child's words and will be signed and dated by the member of staff. Child protection records will record facts and not personal opinions. A body map will be completed if injuries have been observed.
- If there is an immediate safeguarding concern the member of staff will consult with a DSL before completing the form as reporting urgent concerns takes priority.
- If members of staff are in any doubt about recording requirements, they will discuss their concerns with the DSL.
- Child protection records will include a clear and comprehensive summary of the concern, details of how the concern was followed up and resolved and details regarding any action taken, decisions reached and the outcome.
- Child protection records will be kept confidential and stored securely. Child protection records will be kept for individual children and will be maintained separately from all other records relating to the child in the school. Child protection records are kept in accordance with data protection legislation and are retained centrally and securely by the DSL.
- All child protection records will be transferred in accordance with data protection legislation to the child's subsequent school, under confidential and separate cover as soon as possible. Child Protection files will be transferred securely to the new DSL, separately to the child's main file, and a confirmation of receipt will be obtained.
- In addition to the child protection file, the DSL will also consider if it would be appropriate to share any information with the DSL at the new school or college in advance of a child leaving, for example, information that would allow the new school or college to continue to provide support.
- Where the school receives child protection files, the DSL will ensure key staff such as the special educational needs co-ordinators (SENCOs), will be made aware of relevant information as required.

3.12. Multi-Agency Working

- St Nicholas School recognises and is committed to its responsibility to work within the KSCMP multi-agency safeguarding arrangements. The leadership team and DSL will work to establish strong and co-operative local relationships with professionals in other agencies in line with statutory guidance.

- St Nicholas School recognises the importance of multi-agency working and is committed to working alongside partner agencies to provide a coordinated response to promote children's welfare and protect them from harm. This includes contributing to KSCMP processes as required, such as, participation in relevant safeguarding multi-agency plans and meetings, including Child Protection Conferences, Core Groups, Strategy Meetings, Child in Need meetings or other early help multi-agency meetings.

3.13. Confidentiality and Information Sharing

- St Nicholas School recognises our duty and powers to hold, use and share relevant information with appropriate agencies in matters relating to child protection at the earliest opportunity as per statutory guidance outlined within KCSIE 2022.
- St Nicholas School has an appropriately trained Data Protection Officer (DPO) as required by the General Data Protection Regulations (GDPR) to ensure that our school is complaint with all matters relating to confidentiality and information sharing requirements. **The DSL is also the school Data Protection Lead and employs Cantium GDPR in Schools as its hosted DPO service.**
- The headteacher and DSL will disclose relevant safeguarding information about a learner with staff on a 'need to know' basis.

- All members of staff must be aware that whilst they have duties to keep information confidential, in line with our confidentiality policy (https://st-nicholas.kent.sch.uk/Information/policies), they also have a professional responsibility to be proactive in sharing information as early as possible to help identify, assess, and respond to risks or concerns about the safety and welfare of children; this may include sharing information with the DSL and with other agencies as appropriate. All staff are aware they cannot promise confidentiality in situations which might compromise a child's safety or wellbeing.
- Timely information sharing is essential to effective safeguarding
- 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
- 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
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if: it is not possible to gain consent; it cannot be reasonably expected that a practitioner gains consent; or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
    - There's no definitive answer, because even if a victim doesn't consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK GDPR that applies
    - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
    - The DSL should consider that:
        - Parents or carers should normally be informed (unless this would put the victim at greater risk)
        - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care
        - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains
- Regarding anonymity, all staff will:
    - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system

- Do all they reasonably can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved
- Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities

- The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the DSL (or deputy)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

3.14. Complaints

- All members of the school community should feel able to raise or report any concerns about children's safety or potential failures in the school safeguarding regime. The school has a complaints procedure available to parents, learners and members of staff and visitors who wish to report concerns or complaints. This can be found in the school website https://st-nicholas.kent.sch.uk/Information/policies.
- Whilst we encourage members of our community to report concerns and complaints directly to us, we recognise this may not always be possible. Children, young people, and adults who have experienced abuse at school can contact the NSPCC 'Report Abuse in Education' helpline on 0800 136 663 or via email: help@nspcc.org.uk
- Staff can also access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally.
  - Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- The leadership team at St Nicholas School will take all concerns reported to the school seriously and all complaints will be considered and responded to in line with the relevant and appropriate process.
  - Anything that constitutes an allegation against a member of staff or volunteer will be dealt with in line with section 8 of this policy.

4 NOTIFYING PARENTS OR CARERS

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved. We will think carefully about what information we provide about the other child involved, and when. We will work with the police and/or local authority children's social care to make sure our approach to information sharing is consistent.

The DSL will, along with any relevant agencies (this will be decided on a case-by-case basis):

- Meet with the victim's parents or carers, with the victim, to discuss what's being put in place to safeguard them, and understand their wishes in terms of what support they may need and how the report will be progressed

- Meet with the alleged perpetrator's parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s)

5. SPECIFIC SAFEGUARDING ISSUES

- St Nicholas School is aware of a range of specific safeguarding issues and situations that can put children at greater risk of harm. In addition to Part One, DSLs, school leaders and staff who work directly with children will read annex B of KCSIE 2022 which contains important additional information about specific forms of abuse and safeguarding issues.
- Where staff are unsure how to respond to specific safeguarding issues, they should follow the processes as identified in part 3 of this policy and speak with the DSL or a deputy.

5.1 Children missing from education

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

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

- Are at risk of harm or neglect
- Are at risk of forced marriage or FGM
- Come from Gypsy, Roma, or Traveller families
- Come from the families of service personnel
- Go missing or run away from home or care
- Are supervised by the youth justice system
- Cease to attend a school
- Come from new migrant families

We will follow our procedures for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.
Staff will be trained in signs to look out for and the individual triggers to be aware of when considering the risks of potential safeguarding concerns which may be related to being missing, such as travelling to conflict zones, FGM and forced marriage.

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

5.2 Child Criminal Exploitation (CCE)

Child criminal exploitation 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.

5.3 Child Sexual Exploitation (CSE)
Child sexual exploitation is a form of child sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child into sexual activity, in exchange for something the victim needs or wants and/or for the financial advantage or increased status of the perpetrator or facilitator. It may, or may not, be accompanied by violence or threats of violence.

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

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

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

In addition to the CCE indicators above, indicators of CSE can include a child:
- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant

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

5.4. 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. It can also take place both face-to-face and online, and can occur simultaneously between the two.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are there no reports, that doesn't mean that this kind of abuse isn't happening.

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 children (this is sometimes known as 'teenage relationship abuse')
- 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 nude and semi-nude 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.

If staff have any concerns about child-on-child abuse, or a child makes a report to them, they will follow the procedures set out in section 7 of this policy, as appropriate. In particular, section 7.8 and 7.9 set out more detail about our school's approach to this type of abuse.
When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma, and will offer them appropriate support.

5.5 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 (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological or emotional. It can also include ill treatment that isn't physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

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. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.
Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, 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 due to Kent / our school being part of Operation Encompass.
The DSL will provide support according to the child's needs and update records about their circumstances.

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

The DSL and deputies 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.

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

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

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

Forced marriage
Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 1 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 '1 chance' rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

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

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

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

Children who 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 pupil, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL.

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including Internet Safety and Appendix 3 – St. Nicholas School Policy statement on implementing the Prevent Duty (including Risk Assessment for pupils being drawn into Terrorism.

5.9 Sexual Violence and Sexual Harassment Between Children in Schools

Sexual violence and sexual harassment can occur:

- Between two 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 any form of abuse or neglect. Nor should a victim ever be made to feel ashamed for making a report.

When supporting victims, staff will:

- Reassure victims that the law on child-on-child abuse is there to protect them, not criminalise them
- Regularly review decisions and actions, and update policies with lessons learnt
- Look out for potential patterns of concerning, problematic or inappropriate behaviour, and decide on a course of action where we identify any patterns
- Consider if there are wider cultural issues within the school that enabled inappropriate behaviour to occur and whether revising policies and/or providing extra staff training could minimise the risk of it happening again
- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence, and show sensitivity to their needs

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.

Staff should be aware of the importance of:

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

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

5.10 Serious Violence

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

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

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

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

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

5.11 Checking the Identity and Suitability of Visitors
All visitors will be required to verify their identity to the satisfaction of staff and to leave their belongings, including their mobile phone(s), in a safe place during their visit.

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

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

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an appropriate level of DBS check has been carried out (if this is provided, we will not ask to see the DBS certificate)

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

5.13 Non-Collection of Children
If a child is not collected at the end of the session/day, we will contact each of the three contacts that are provided to try to secure a replacement person to collect the pupil. In some specific circumstances, members of staff from the Senior or Extended Leadership Team(s) will take the child home in their own vehicle (provided they have the appropriate Business Class 1 insurance).

5.14 Missing Pupils
Our procedures are designed to ensure that a missing child is found and returned to effective supervision as soon as possible. If a child goes missing, we will contact the KCC Child Missing Education adviser through Early Help.

6. SUPPORTING CHILDREN POTENTIALLY AT GREATER RISK OF HARM

- Whilst all children should be protected, some groups of children are potentially at greater risk of harm.

6.1. Safeguarding Children with Special Educational Needs or Disabilities (SEND)

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions can face additional safeguarding challenges, and are three times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's condition without further exploration
- Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
- The potential for pupils with SEN, disabilities or certain health conditions being disproportionally impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in managing or reporting these challenges

Any abuse involving pupils with SEND will require close liaison with the DSL (or deputy) and the SENCO.

6.2. Children Requiring Mental Health Support

- All staff will be made 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.
- Staff are aware that children's experiences, for example where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, can impact on their mental health, behaviour and education.
- Staff are well placed to observe children day-to-day and identify those whose behaviour suggests that they may be experiencing a mental health problem or be at risk of developing one.
- If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken by speaking to the DSL or a deputy
- St Nicholas School has a Well-being Team of qualified mental health professionals with Emma Wellard (Designated Mental Health Lead) as the Line Manager of this group of staff.

6.3. Children Missing from Education

- Children missing from education, particularly persistently, can act as a vital warning sign to a range of safeguarding issues including neglect, sexual abuse, and child sexual and criminal exploitation.
- Where the school have concerns that a child is missing from education, we will respond in line with our statutory duties and local policies. Local support is available via the **PRU, Inclusion and Attendance Service (PIAS).**

6.4. Elective Home Education

- Where a parent/carer expresses their intention to remove a child from school with a view to educating at home, we will respond in line with **National Elective Home Education guidance** and local **Kent guidance** and will work together with parents/carers and other key professionals and organisations to ensure decisions are made in the best interest of the child.

6.5. Children Who Need a Social Worker

- The DSL will hold details of social workers working with children in the school so that decisions can be made in the best interests of the child's safety, welfare, and educational outcomes.
- Where children have a social worker, this will inform school decisions about their safety and promoting their welfare, for example, responding to unauthorised absence and provision of pastoral and/or academic support.

6.6. Looked After Children, Previously Looked After Children and Care Leavers

- St Nicholas School recognises the common reason for children becoming looked after is as a result of abuse and/or neglect and a previously looked after child also potentially remains vulnerable.
- The school has appointed a designated teacher (Stephen King, DHT/DSL) who works with local authorities to promote the educational achievement of registered pupils who are looked after or who have been previously looked after.

  The designated teacher will work with the DSL to ensure appropriate staff have the information they need in relation to a child's looked after legal status, contact arrangements with birth

parents or those with parental responsibility, care arrangements and the levels of authority delegated to the carer by the authority looking after them.

- Where a child is looked after, the DSL will hold details of the social worker and the name of the virtual school head in the authority that looks after the child.
- Where the school believe a child is being cared for as part of a private fostering arrangement (occurs when a child under 16 or 18 if the child is disabled is cared for and lives with an adult who is not a relative for 28 days or more) there is a duty to recognise these arrangements and inform the Local Authority via the front door.
- Where a child is leaving care, the DSL will hold details of the local authority Personal Advisor appointed to guide and support them and will liaise with them as necessary regarding any issues of concern.

7. INTERNET SAFETY (SEE INTERNET SAFETY POLICY)

- It is essential that children are safeguarded from potentially harmful and inappropriate material or behaviours online. St Nicholas School will adopt a whole school approach to internet safety which will empower, protect, and educate our learners and staff in their use of technology, and establish mechanisms to identify, intervene in, and escalate any concerns where appropriate.
- St Nicholas School will ensure internet safety is reflected as required in all relevant policies. Internet safety is considered as a running and interrelated theme when devising and implementing our policies and procedures and when planning our curriculum, staff training, the role and responsibilities of the DSL and parental engagement.
- St Nicholas School identifies that the breadth of issues classified within internet safety is considerable, but can be categorised into four areas of risk:
    - Content: being exposed to illegal, inappropriate or harmful content. For example pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism.
    - Contact: being subjected to harmful online interaction with other users. For example peer to peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes.
    - Conduct: personal online behaviour that increases the likelihood of, or causes, harm. For example, making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying.
    - Commerce: risks such as online gambling, inappropriate advertising, phishing and or financial scams.

- St Nicholas School recognises that technology, and the risks and harms related to it, evolve and change rapidly. The school will carry out an annual review of our approaches to internet safety, supported by an annual risk assessment which considers and reflects the risks our children face.
- The headteacher will be informed of internet safety concerns by the DSL, as appropriate. The named governor for safeguarding will report on internet safety practice and incidents, including outcomes, on a regular basis to the wider governing body.

7.1. Policies and Procedures

- The DSL has overall responsibility for internet safety within the school but will liaise with other members of staff, for example IT technicians, curriculum leads etc. as necessary. **Amend as appropriate.**

- The DSL will respond to internet safety concerns reported in line with our child protection and other associated policies, including our anti-bullying, social media and behaviour policies. **Amend as appropriate.**
    - Internal sanctions and/or support will be implemented as appropriate.
    - Where necessary, concerns will be escalated and reported to relevant partner agencies in line with local policies and procedures.
- St Nicholas School uses a wide range of technology. This includes (**amend as appropriate**) computers, laptops, tablets and other digital devices, the internet, our learning platform, intranet and email systems.
    - All School owned devices and systems will be used in accordance with our acceptable use policies and with appropriate safety and security measures in place.
- St Nicholas School recognises the specific risks that can be posed by mobile and smart technology, including mobile/smart phones, cameras and wearable technology. In accordance with KCSIE 2022 and EYFS 2021 (**remove reference for settings without EYFS provision**) St Nicholas School has appropriate mobile and smart technology and image use policies in place, which are shared and understood by all members of the community. The guidance for this is found in our Mobile Technology and Social Media Policy (an appendix of our Internet safety Policy.

7.2. Appropriate Filtering and Monitoring

- St Nicholas School will do all we reasonably can to limit children's exposure to online risks through school provided IT systems and will ensure that appropriate filtering and monitoring systems are in place.
    - The school uses Lightspeed Relay for website filtering for staff and students. This included monitoring, reporting and access to websites. We carried this filtering solution over from our previous suppler of email and broadband services, in order to maintain 'like for like' services as part of that transition.
    - Microsoft 365 is the platform we use that contains tools for communication. Email, Teams and Onedrive are part of this. There are tools for monitoring, reporting and access to these services via the Microsoft 365 platform. We have this platform courtesy of Microsoft who offer Office 365 services free to schools, which has replaced our older segregated services of email and communication software (Skype)
    - These system are being secured through tools included with both lightspeed and Microsoft 365 platform. On computers directly, we also use 3rd party antivirus/malware protection through Trent Micro Antivirus. Ongoing training and advice is offered to all staff to help prevent phishing/social engineering scams.
        - If learners or staff discover unsuitable sites or material, they are required to: turn off monitor/screen (where possible), report the concern immediately to a member of staff who will report the URL of the site to the ICT team.
        - All users will be informed that use of our systems can be monitored, and that monitoring will be in line with data protection, human rights, and privacy legislation.
        - Filtering breaches or concerns identified through our monitoring approaches will be recorded and reported to the DSL who will respond as appropriate.
        - Any access to material believed to be illegal will be reported immediately to the appropriate agencies, such as the **Internet Watch Foundation** and the police.
        - When implementing appropriate filtering and monitoring, St Nicholas School will ensure that "over blocking" does not lead to unreasonable restrictions as to what children can be taught with regards to online teaching and safeguarding.

- St Nicholas School acknowledges that whilst filtering and monitoring is an important part of school internet safety responsibilities, it is only one part of our approach to internet safety.
    - Learners will use appropriate search tools, apps and online resources as identified following an informed risk assessment.
    - Learners internet use will be supervised by staff according to their age and ability.
    - Learners will be directed to use age appropriate online resources and tools by staff.

7.3. Information Security and Access Management

- St Nicholas School is responsible for ensuring an appropriate level of security protection procedures are in place, in order to safeguard our systems as well as staff and learners. Further information can be found in the data and information protection policy, acceptable use policies and/or internet safety policy. These policies address expectations with regards information security and access to systems e.g. password safety etc.
- St Nicholas School will review the effectiveness of these procedures periodically to keep up with evolving cyber-crime technologies.

7.4. Staff Training for Child Protection (Including PREVENT and Internet Safety)

- St Nicholas School will ensure that all staff receive internet safety training as part of induction and that ongoing internet safety training and update for all staff will be integrated, aligned and considered as part of our overarching safeguarding approach.

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

This training will be regularly updated and will:

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

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas.
Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, e-bulletins and staff meetings).

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

There are termly Child Protection (including Internet Safety) updates in the termly vision meeting and an annual refresher of CP, Internet Safety, Health and Preventing Extremism via the HAYS online safeguarding course.

7.5. Educating Learners

- St Nicholas School will ensure a comprehensive whole school curriculum response is in place to enable all learners to learn about and manage online risks effectively as part of providing a broad and balanced curriculum.

DSLs and SLT may find it helpful to access UK Council for Internet Safety (UKCIS) '*Education for a Connected World Framework*' and DfE '*Teaching internet safety in school*' guidance.

7.6. Working with Parents/Carers

- St Nicholas School will build a partnership approach to internet safety and will support parents/carers to become aware and alert of the potential online benefits and risks for children by:
    - providing information on our school website and through existing communication channels (such as official social media, newsletters etc.),
    - offering specific internet safety events for parents/carers
    - highlighting internet safety at existing events.

7.7. Remote Learning

- St Nicholas School will ensure any remote sharing of information, communication and use of online learning tools and systems will be in line with privacy and data protection requirements.
- All communication with learners and parents/carers will take place using school provided or approved communication channels; for example, school provided email accounts and phone numbers and/or agreed system (Microsoft Office 365).
    - Any pre-existing relationships or situations which mean this cannot be complied with will be discussed with the DSL.
- Staff and learners will engage with remote teaching and learning in line with existing behaviour principles as set out in our school behaviour policy and Acceptable Use Policies.
- Staff and learners will be encouraged to report issues experienced at home and concerns will be responded to in line with our child protection and other relevant policies.
- When delivering remote learning, staff will follow our Remote Learning Acceptable Use Policy (AUP) **A template remote learning AUP for schools/colleges to adapt is available here. If schools/colleges do not have a remote learning AUP, key messages and expectations should be included within this policy or added within existing AUPs.**
- Parents/carers will be made aware of what their children are being asked to do online, including the sites they will be asked to access. St Nicholas School will continue to be clear who from the school their child is going to be interacting with online.
- Parents/carers will be encouraged to ensure children are appropriately supervised online and that appropriate parent controls are implemented at home.

8. STAFF ENGAGEMENT AND EXPECTATIONS

8.1. Awareness, Induction and Training

- All members of staff have been provided with a copy of part one or annex A of 'Keeping Children Safe in Education' 2022 which covers safeguarding information for staff.
    - School leaders, including the DSL will read KCSIE in its entirety.
    - School leaders and all members of staff who work directly with children will read annex B.
    - All members of staff have signed to confirm that they have read and understood the national guidance shared with them, via an online reporting/recording form.

- The DSL will ensure that all new staff and volunteers (including agency and third-party staff) receive safeguarding and child protection training (including internet safety), including information to ensure they are aware of the school internal safeguarding processes, as part of their induction via leaflets, specific training by the DSL and an e-Learning course.
- All staff members (including agency and third-party staff) will receive appropriate child protection training (including internet safety) to ensure they are aware of a range of safeguarding issues; this training will be updated at least annually via a termly update from the DSL and an annual e-learning course.
- Safeguarding training for staff, including internet safety training, will be integrated, aligned and considered as part of the whole school safeguarding approach and wider staff training and curriculum planning.
- In addition to specific child protection training, all staff will receive regular safeguarding and child protection updates, at least annually, to provide them with relevant skills and knowledge to safeguard children effectively via a termly update from the DSL and an annual e-learning course.
- Staff will be encouraged to contribute to and shape school safeguarding arrangements and child protection policies via input from knowledgeable and experienced staff, inviting input at staff meetings and having an open-door consulation system.
- The DSL and headteacher will provide an annual report to the governing body detailing safeguarding training undertaken by all staff and will maintain an up to date register of who has been trained.
- Although the school has a nominated lead for the governing body (Heidi Dawson), all members of the governing body will access appropriate safeguarding training which covers their specific strategic responsibilities on a regular basis.

8.2. **Safer Working Practice**

- All members of staff are required to work within our clear guidelines on safer working practice as outlined in the school behaviour policy.
- The DSL will ensure that all staff and volunteers (including agency and third-party staff) have read the child protection policy and are aware of the school expectations regarding safe and professional practice via the staff behaviour policy and Acceptable Use Policy (AUP).
- Staff will be made aware of the school behaviour management and physical intervention policies. Staff will manage behaviour effectively to ensure a good and safe educational environment and will have a clear understanding of the needs of all children. Physical interventions and/or use of reasonable force will be in line with our agreed policy and procedures and national guidance.
- All staff will be made aware of the professional risks associated with the use of social media and electronic communication (such as email, mobile phones, texting, social networking). Staff will adhere to relevant school policies including staff code of conduct, Acceptable Use Policies, and Social Media.

8.3. **Supervision and Support**

- The induction process will include familiarisation with child protection responsibilities and procedures to be followed if members of staff have any concerns about a child's safety or welfare.
- The school will ensure that members of staff who are working within the foundation stage are provided with appropriate supervision in accordance with the statutory requirements of Early Years Foundation Stage (EYFS) 2021.
- The school will provide appropriate supervision and support for all members of staff to ensure that:

- All staff are competent to carry out their responsibilities for safeguarding and promoting the welfare of children
- All staff are supported by the DSL in their safeguarding role.
- All members of staff have regular reviews of their own practice to ensure they improve over time.

- Any member of staff affected by issues arising from concerns for children's welfare or safety can seek support from the DSL.
- The DSL will also put staff in touch with outside agencies for professional support if they so wish. Staff can also approach organisations such as their Union, the Education Support Partnership or other similar organisations directly.

9. SAFER RECRUITMENT AND ALLEGATIONS

9.1. Safer Recruitment and Safeguarding Checks

- St Nicholas School is committed to ensure that develop a safe culture and that all steps are taken to recruit staff and volunteers who are safe to work with our learners and staff.
  - St Nicholas School will follow relevant guidance in Keeping Children Safe in Education 2022 (Part Three, 'Safer Recruitment') and from The Disclosure and Barring Service (DBS)
  - The governing body and leadership team are responsible for ensuring that the school follows safe recruitment processes as outlined within guidance.
  - The governing body will ensure that there is at least one of the persons who conducts an interview has completed safer recruitment training.
- The school maintains an accurate Single Central Record (SCR) in line with statutory guidance.
- St Nicholas School are committed to supporting the statutory guidance from the Department for Education on the application of the Childcare (Disqualification) Regulations 2009 and related obligations under the Childcare Act 2006 in schools.
- We advise all staff to disclose any reason that may affect their suitability to work with children including convictions, cautions, court orders, cautions, reprimands, and warnings.
- Where the school organises work experience placements, we will follow the advice and guidance as identified in part Three of KCSIE 2022.

9.2. Allegations/concerns raised in relation to teachers, including supply teachers, other staff, volunteers and contractors

- The School will respond to allegations in line with the **local Kent allegations arrangements** and **Part Four of KCSIE 2022**. In depth information can be found within our 'Managing Allegations against Staff' and staff behaviour policy**.** This can be found on the school website.
- Any concerns or allegations about staff, including those which do not meet the allegation/harm threshold (8.2.1) will be recorded and dealt with appropriately in line with national and local guidance. Ensuring concerns are dealt with effectively will protect those working in or on behalf of the school from potential false allegations or misunderstandings.
- Where headteachers are unsure how to respond, for example if the school is unsure if a concern meet the harm 'thresholds', advice will be sought via **the Local Authority Designated Officer** (LADO) Enquiry Line and/or the **Education Safeguarding Service**.

Concerns that meet the 'harm threshold'

- St Nicholas School recognises that it is possible for any member of staff, including volunteers, governors, contractors, agency and third-party staff (including supply teachers) and visitors to behave in a way that indicates a person would pose a risk of harm if they continue to work in

their present position, or in any capacity with children in a school or college. This includes when someone has

- behaved in a way that has harmed a child, or may have harmed a child and/or
- possibly committed a criminal offence against or related to a child and/or;
- behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children; and/or
- behaved or may have behaved in a way that indicates they may not be suitable to work with children.

- Allegations against staff which meet this threshold will be referred immediately to the headteacher who will contact the LADO to agree further action to be taken in respect of the child and staff member. In the event of allegations of abuse being made against the headteacher, staff are advised that allegations should be reported to the chair of governors who will contact the LADO.

Concerns that do not meet the *harm threshold*

- St Nicholas School may also need to take action in response to 'low-level' concerns about staff, which typically would be behaviours which are inconsistent with our staff code of conduct, including inappropriate conduct outside of work and concerns that do not meet the allegations threshold.
- Where low-level concerns are reported to the school, the headteacher may consult or liaise with the LADO enquiries officer via the **LADO Enquiry Line**.
- Low-level concerns will be recorded in writing using the "Green Form" report and reviewed so potential patterns of concerning, problematic or inappropriate behaviour can be identified. Where a pattern is identified, the school will implement appropriate action, for example consulting with **the LADO enquiry line** and following our disciplinary procedures.
- Additional information regarding low-level concerns is contained with our staff code of conduct – this includes what a low-level concern is and the importance of sharing them.

Safe Culture

- As part of our approach to safeguarding, the School has created and embedded a culture of openness, trust and transparency in which our values and expected behaviour as set out in our staff behaviour policy/code of conduct are constantly lived, monitored and reinforced by all staff (including supply teachers, volunteers and contractors) and where all concerns are dealt with promptly and appropriately.
- All staff and volunteers should feel able to raise any concerns about poor or unsafe practice and potential failures in the school safeguarding regime. The leadership team at St Nicholas School will takes all concerns or allegations received seriously.

- All members of staff are made aware of the school Whistleblowing procedure (found on the school website). It is a disciplinary offence not to report concerns about the conduct of a colleague that could place a child at risk.
- Staff can access the NSPCC whistleblowing helpline if they do not feel able to raise concerns regarding child protection failures internally. Staff can call 0800 028 0285 (8:00 AM to 8:00 PM Monday to Friday) or email help@nspcc.org.uk.
- St Nicholas School has a legal duty to refer to the Disclosure and Barring Service (DBS) anyone who has harmed, or poses a risk of harm, to a child, or if there is reason to believe the member of staff has committed one of a number of listed offences, and who has been removed from working (paid or unpaid) in regulated activity or would have been removed had they not left. The DBS will consider whether to bar the person.

- If these circumstances arise in relation to a member of staff at our school, a referral will be made as soon as possible after the resignation or removal of the individual in accordance with advice from the **LADO** and/or Schools' Personnel Service.

10. OPPORTUNITIES TO TEACH SAFEGUARDING

- St Nicholas School will ensure that children are taught about safeguarding, including internet safety, as part of providing a broad and balanced curriculum. This will include covering relevant issues through Relationships and Sex Education and Personal Social & Health Education.
- We recognise that school play an essential role in helping children to understand and identify the parameters of what is appropriate child and adult behaviour, what is 'safe', to recognise when they and others close to them are not safe, and how to seek advice and support when they are concerned. Our curriculum provides opportunities for increasing self-awareness, self-esteem, social and emotional understanding, assertiveness and decision making so that learners have a range of age appropriate contacts and strategies to ensure their own protection and that of others.
- St Nicholas School recognise that a one size fits all approach may not be appropriate for all children, and a more personalised or contextualised approach for more vulnerable children, victims of abuse and some SEND children might be needed.
- Our school systems support children to talk to a range of staff. Children will be listened to and heard, and their concerns will be taken seriously and acted upon as appropriate.

11. PHYSICAL SAFETY

11.1. Use of *Reasonable Force*

- There may be circumstances when it is appropriate for staff to use reasonable force in order to safeguard children from harm. Further information regarding our approach and expectations can be found in our behaviour policy.

11.2. The Use of Premises by Other Organisations

- Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and governing body will seek written assurance that the organisation concerned has appropriate policies and procedures in place regarding safeguarding children and child protection, and that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved, an application to use premises will be refused.
- Safeguarding requirements will be included in any transfer of control agreement (i.e. lease or hire agreement), as a condition of use and occupation of the premises. Failure to comply with this will lead to termination of the agreement.

11.3. Site Security

- All members of staff have a responsibility for maintaining awareness of buildings and grounds security and for reporting concerns that may come to light.
- Appropriate checks will be undertaken in respect of visitors and volunteers coming into school as outlined within national guidance. Visitors will be expected to, sign in and out via the office visitors log and to display a visitor's badge whilst on site.
- Staff and visitors will be expected to adhere to any safety arrangements implemented because of Covid-19 restrictions.

- Any individual who is not known or identifiable on site should be challenged for clarification and reassurance.
- The school will not accept the behaviour of any individual (parent or other) that threatens school security or leads others (child or adult) to feel unsafe. Such behaviour will be treated as a serious concern and may result in a decision to refuse access for that individual to the school site.

12. LOCAL SUPPORT

- All members of staff in St Nicholas School are made aware of local support available.

Education Safeguarding Service

- **Area Safeguarding Advisor**
  https://www.theeducationpeople.org/our-expertise/safeguarding/safeguarding-contacts/
  Canterbury - 03000 418503
- **Internet safety in the Education Safeguarding Service**
  - 03000 415797
  - esafetyofficer@theeducationpeople.org (non-urgent issues only)

- **LADO Service**
  - Telephone: 03000 410888
  - Email: kentchildrenslado@kent.gov.uk
- **Integrated Children's Services**
  - Front door: 03000 411111
  - Out of Hours Number: 03000 419191
- **Kent Police**
  - 101 or 999 if there is an immediate risk of harm
    Jodie Hobbs PC 46011101 (Schools Officer) Jodie.Hobbs@kent.police.uk
- **Kent Safeguarding Children Multi-Agency Partnership (KSCMP)**
  - kscmp@kent.gov.uk
  - 03000 421126
- **Adult Safeguarding**
  - Adult Social Care via 03000 41 61 61 (text relay 18001 03000 41 61 61) or email social.services@kent.gov.uk

MONITORING AND REVIEW

This policy will be reviewed by the DSL on an annual basis. At every review, the policy will be approved by the full governing board.

EQUALITY, SAFEGUARDING AND EQUAL OPPORTUNITIES STATEMENT

St Nicholas School, in all policies and procedures, will promote equality of opportunity for students and staff from all social, cultural and economic backgrounds and ensure freedom from discrimination on the basis of membership of any group including gender, sexual orientation, family circumstances, ethnic or national origin, disability (physical or mental), religious or political beliefs.

As part of our commitment to meet the Public Sector Equality Duty (PSED), St Nicholas School aims to:

- Provide equal opportunity for all;
- Foster good relations, and create effective partnership with all sections of the community;
- Only take actions which does not discriminate unlawfully in service delivery, commissioning and employment;
- Provide an environment free from fear and discrimination, where diversity, respect and dignity are valued.

All aspects of Safeguarding will be embedded into the life of the School and be adhered to and be the responsibility of all staff.

13. LINKS TO OTHER POLICIES

Health and Safety
All Curriculum Policies
Positive Behaviour Support
Staff Code of Conduct
Managing Allegations against Staff
Anti-Bullying
Safer Recruitment
Internet Safety
Single Equality
Supporting Pupils with Medical Conditions
Lettings
Management of Premises
Well-Being
Bereavement and Loss
Creative Therapies
Children in Care

STEPHEN KING REVISED TERM 6 2022 NEXT REVIEW DATE TERM 1 2023/2024 RATIFIED BY CHAIRPERSON'S ACTION ON 18 JULY 2022.

Appendix 1: CATEGORIES OF ABUSE

All staff should be aware that abuse, neglect, and safeguarding issues are rarely standalone events that can be covered by one definition or label. In most cases multiple issues will overlap with one another.

Abuse: a form of maltreatment of a child. Somebody may abuse or neglect a child by inflicting harm, or by failing to act to prevent harm. They may be abused by an adult or adults or another child or children. It should be noted that abuse can be carried out both on and offline and be perpetrated by men, women, and children.

Sexual abuse: involves forcing or enticing a child or young person to take part in sexual activities, not necessarily involving a high level of violence, whether or not the child is aware of what is happening. The activities may involve physical contact, including assault by penetration (for example rape or oral sex) or non-penetrative acts such as masturbation, kissing, rubbing, and touching outside of clothing. They may also include non-contact activities, such as involving children in looking at, or in the production of, sexual images, watching sexual activities, encouraging children to behave in sexually inappropriate ways, or grooming a child in preparation for abuse (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.

Signs that MAY INDICATE Sexual Abuse

- Sudden changes in behaviour and performance
- Displays of affection which are sexual and age inappropriate
- Self-harm, self-mutilation or attempts at suicide
- Alluding to secrets which they cannot reveal
- Tendency to cling or need constant reassurance
- Regression to younger behaviour for example thumb sucking, playing with discarded toys, acting like a baby
- Distrust of familiar adults e.g. anxiety of being left with relatives, a childminder or lodger
- Unexplained gifts or money
- Depression and withdrawal
- Fear of undressing for PE
- Sexually transmitted disease
- Fire setting

Physical abuse: a form of abuse which 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.

Signs that MAY INDICATE physical abuse

- Bruises and abrasions around the face
- Damage or injury around the mouth
- Bi-lateral injuries such as two bruised eyes
- Bruising to soft area of the face such as the cheeks
- Fingertip bruising to the front or back of torso
- Bite marks
- Burns or scalds (unusual patterns and spread of injuries)
- Deep contact burns such as cigarette burns

- Injuries suggesting beatings (strap marks, welts)
- Covering arms and legs even when hot
- Aggressive behaviour or severe temper outbursts.
- Injuries need to be accounted for. Inadequate, inconsistent, or excessively plausible explanations or a delay in seeking treatment should signal concern.

Emotional abuse: the persistent emotional maltreatment of a child such as to cause severe and adverse effects on the child's emotional development. It 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. It may include not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate. It may feature 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. It may involve seeing or hearing the ill-treatment of another. It may involve serious bullying (including cyberbullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children. Some level of emotional abuse is involved in all types of maltreatment of a child, although it may occur alone.

Signs that MAY INDICATE emotional abuse

- Over reaction to mistakes
- Lack of self-confidence/esteem
- Sudden speech disorders
- Self-harming
- Eating Disorders
- Extremes of passivity and/or aggression
- Compulsive stealing
- Drug, alcohol, solvent abuse
- Fear of parents being contacted
- Unwillingness or inability to play
- Excessive need for approval, attention, and affection

Neglect: 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); or ensure access to appropriate medical care or treatment. It may also include neglect of, or unresponsiveness to, a child's basic emotional needs.

Signs that MAY INDICATE neglect.

- Constant hunger
- Poor personal hygiene
- Constant tiredness
- Inadequate clothing
- Frequent lateness or non-attendance
- Untreated medical problems
- Poor relationship with peers
- Compulsive stealing and scavenging

- Rocking, hair twisting and thumb sucking
- Running away
- Loss of weight or being constantly underweight
- Low self esteem

Appendix 2: SUPPORT ORGANISATIONS

NSPCC 'Report Abuse in Education' Helpline

- 0800 136 663 or help@nspcc.org.uk

National Organisations

- NSPCC: www.nspcc.org.uk
- Barnardo's: www.barnardos.org.uk
- Action for Children: www.actionforchildren.org.uk
- Children's Society: www.childrenssociety.org.uk

Support for Staff

- Education Support Partnership: www.educationsupportpartnership.org.uk
- Professional Internet safety Helpline: www.saferinternet.org.uk/helpline

Support for Learners

- ChildLine: www.childline.org.uk
- Papyrus: www.papyrus-uk.org
- The Mix: www.themix.org.uk
- Shout: www.giveusashout.org
- Fearless: www.fearless.org
- Victim Support: www.victimsupport.org.uk

Support for Adults

- Family Lives: www.familylives.org.uk
- Crime Stoppers: www.crimestoppers-uk.org
- Victim Support: www.victimsupport.org.uk
- The Samaritans: www.samaritans.org
- NAPAC (National Association for People Abused in Childhood): www.napac.org.uk
- MOSAC: www.mosac.org.uk
- Action Fraud: www.actionfraud.police.uk
- Shout: www.giveusashout.org
- Advice now: www.advicenow.org.uk

Support for Learning Disabilities

- Respond: www.respond.org.uk
- Mencap: www.mencap.org.uk
- Council for Disabled Children: https://councilfordisabledchildren.org.uk

Contextual Safeguarding Network

- https://contextualsafeguarding.org.uk/

Kent Resilience Hub

- https://kentresiliencehub.org.uk/

Substance Misuse

- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Talk to Frank: www.talktofrank.com

Domestic Abuse

- Domestic abuse services: www.domesticabuseservices.org.uk
- Refuge: www.refuge.org.uk
- Women's Aid: www.womensaid.org.uk
- Men's Advice Line: www.mensadviceline.org.uk
- Mankind: www.mankindcounselling.org.uk
- National Domestic Abuse Helpline: www.nationaldahelpline.org.uk
- Respect Phoneline: https://respectphoneline.org.uk

Criminal and Sexual Exploitation

- National Crime Agency: www.nationalcrimeagency.gov.uk/who-we-are
- It's not okay: www.itsnotokay.co.uk
- NWG Network: www.nwgnetwork.org

Honour Based Abuse

- Forced Marriage Unit: www.gov.uk/guidance/forced-marriage
- FGM Factsheet: https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/496415/6_1639_HO_SP_FGM_mandatory_reporting_Fact_sheet_Web.pdf
- Mandatory reporting of female genital mutilation: procedural information: www.gov.uk/government/publications/mandatory-reporting-of-female-genital-mutilation-procedural-information

Peer on Peer abuse, including bullying, sexual violence and harassment

- Rape Crisis: https://rapecrisis.org.uk
- Brook: www.brook.org.uk
- Disrespect Nobody: www.disrespectnobody.co.uk
- Upskirting – know your rights: www.gov.uk/government/news/upskirting-know-your-rights
- Lucy Faithfull Foundation: www.lucyfaithfull.org.uk
- Stop it Now! www.stopitnow.org.uk
- Parents Protect: www.parentsprotect.co.uk
- Anti-Bullying Alliance: www.anti-bullyingalliance.org.uk
- Diana Award: www.antibullyingpro.com/
- Bullying UK: www.bullying.co.uk
- Kidscape: www.kidscape.org.uk

Internet safety

- CEOP: www.ceop.police.uk
- Internet Watch Foundation (IWF): www.iwf.org.uk
- Think U Know: www.thinkuknow.co.uk
- Childnet: www.childnet.com
- UK Safer Internet Centre: www.saferinternet.org.uk
- Report Harmful Content: https://reportharmfulcontent.com
- Marie Collins Foundation: www.mariecollinsfoundation.org.uk
- Internet Matters: www.internetmatters.org
- NSPCC: www.nspcc.org.uk/onlinesafety and www.net-aware.org.uk
- Get Safe Online: www.getsafeonline.org
- Parents Protect: www.parentsprotect.co.uk
- Cyber Choices: https://nationalcrimeagency.gov.uk/what-we-do/crime-threats/cyber-crime/cyberchoices
- National Cyber Security Centre (NCSC): www.ncsc.gov.uk

Mental Health

- Mind: www.mind.org.uk
- Moodspark: https://moodspark.org.uk
- Young Minds: www.youngminds.org.uk
- We are with you (formerly Addaction): www.wearewithyou.org.uk/services/kent-for-young-people/
- Anna Freud: www.annafreud.org/schools-and-colleges/

Radicalisation and hate

- Educate against Hate: www.educateagainsthate.com
- Counter Terrorism Internet Referral Unit: www.gov.uk/report-terrorism
- True Vision: www.report-it.org.uk

Children with Family Members in Prison

- National information Centre on Children of Offenders (NICCO): https://www.nicco.org.uk/

APPENDIX 3 – ST NICHOLAS SCHOOL POLICY STATEMENT ON IMPLEMENTING THE PREVENT DUTY (including Risk Assessment for pupils being drawn into Terrorism)

Background – The Counter-Terrorism and Security Act (July 2015) requires the proprietors of Schools "to have due regard, in the exercise of their functions, to prevent people from being drawn into terrorism". This is known as the 'Prevent Duty' – *see DFE (2015) 'The Prevent Duty – Departmental advice for schools and childcare providers'; Cabinet Office (2013) 'Tackling extremism in the UK - Report from the Prime Minister's Task Force on Tackling Radicalisation and Extremism; Crown (2015) Revised Prevent Duty Guidance: for England and Wales Guidance for specified authorities in England and Wales on the duty in the Counter-Terrorism and Security Act 2015 to have due regard to the need to prevent people from being drawn into terrorism.*

Definition – For the purposes of this policy the definition of radical or extreme ideology is "a set of ideas which could justify vilification or violence against individuals, groups of self". Today, the government defines **extremism** as "vocal or active opposition to fundamental British values, including democracy, the rule of law, individual liberty and mutual respect and tolerance of different faiths and beliefs".

Aims – i) To ensure all staff understand that risks of radicalisation within our school and how the risk may change from time to time.

ii) To ensure staff are aware of the Prevent Strategy and are able to protect pupils who are vulnerable or may be at risk of being radicalised;

iii) The school maintains for diversity to be a core part of what it does. As part of its role in following the Prevent Strategy a strong emphasis on 'British Values' as well as the common values that all communities share, such as self-respect, understanding, tolerance and the sanctity of life. Our pupils are taught to respect and value diversity as well as understanding how to make safe, well-considered decisions. We use our curriculum (e.g. PSHE, History, ICT, RE, Geography) to promote Democracy, The Rule of Law, Individual Liberty, Mutual Respect and the Tolerance of Other Faiths and Beliefs.

iv) As part of our planning and monitoring systems, we pay due regard to assessing the risks posed by and visitors to the school, parents/carers, potential pupils who are part of hiring and lettings of the venue and the local business we work with & companies we procure services from. We only use services who promote 'British Values'.

Signs of Radicalisation – these may include:

- pupils/people suddenly changing their style of dress or appearance to 'fit in' with a particular group or cause
- pupils/people losing interest with their regular friends
- pupils/people using derogatory or threatening terms for rival groups, other religions or the British armed forces
- pupils/people showing 'technical expertise' in areas such as survival skills, weapons and/or chemicals
- Disappearance from school with no notice for a holiday with friends or family who are also missing – in order to move/be taken abroad to join an extremist group
- Not returning to school following a holiday period

ICT policy, practices and concerns:

- Within the school our pupils are protected from accessing extremist materials due to our triple lock filtering system – *see Internet safety Policy*.
- The pupils are potentially more vulnerable to radicalisation or extremist viewpoints when they are out of school due to their exposure to differing political/social attitudes and cultural backgrounds.
- Vulnerability is potentially higher due to the school not be in control of home Internet security, filtering systems or levels of parental monitoring and supervision of inappropriate content during internet sessions on computers, laptops or mobile devices.
- St Nicholas school does offer regular advice, training and support to parents and carers.
- Within the school Computing and Internet safety schemes of work pupils are taught to discern appropriate content, be internet safety aware and we introduce the concepts of online radicalisation and access to extreme ideologies using web-based sources – and what to do/who to report to if they have a worry or concern.

Risk Assessment: LOW (Islamic Extremism)/Moderate (Far Right Extremism)

St Nicholas School has secure filtering systems within school and provides support for parents via the school newsletter, website and training workshops on internet safety. The school is situated in Canterbury, an area of very low or zero reported incidences of Islamic Extremism concerns (a Tier 3 priority area in the National Prevent Risk Assessment for England and Wales, which is the lowest level). The group to be considered worthy of monitoring are unaccompanied asylum-seeking migrants from Africa or the Middle East – we have no such pupils at this time.

The South East of England is in an area that has a low to medium incidence of Far Right Extremist attitudes. Parental supervision of online experiences of our pupils cannot be assured, but due to their Profound, Severe and Complex Learning Needs their understanding of the materials they may have access to will be limited.

Risk assessment carried out by the SLT on 1st November 2017, is reviewed annually and will be reviewed on 1st November 2021. The school Prevent Self-Assessment and Action Plan is being completed and is in the process of being made available online on the school website.

Staff training in order to fulfil the requirements of the prevent duty the school will:

- All members of the SLT, SMT, ICT Technician Staff, Safeguarding Governors and the Chair/Vice-Chair of the Governing Body have undergone Prevent awareness training e.g. Induction Prevent Training workshop AND Channel Online awareness training, (https://www.elearning.prevent.homeoffice.gov.uk/edu/screen1.html); annual HAYS online Safeguarding training and a 3 yearly Workshop to Raise Awareness of Prevent session with the school-based Home Office Approved WRAP trainer (S King).
- The Designated Safeguarding Lead (DSL) will disseminate key information regarding the Prevent Duty in all Safeguarding induction or update training for all staff.
- Staff are trained to be vigilant in spotting signs of extremist views or behaviours and they will report any such concerns to the DSL via the school Safeguarding reporting procedures

Working in partnership

St Nicholas works in partnership with the Local Authority Safeguarding team, Social Services and the police. Any pupil deemed to be at risk of radicalisation will be referred by the school DSL team to the KCC Channel Referral and Intervention processes, following on from a Safeguarding consultation. Support and advice can also be gained from the Canterbury Community Safety Partnership and the East Kent Area Police Prevent Officer.

STAFF ADVICE AND REPORTING PROCESS

What do you do if you have a concern?

- Complete the green safeguarding concern form and hand it immediately into the DSL.
- The Kent Prevent Partners (Channel) Referral Form to be emailed to channel@kent.pnn.police.uk

I have read, understood and will follow the Safeguarding policy advice on suspected Extremism risks

Signed: ----------

Role: ---------- **Date:** ----------

Appendix 4 – ST NICHOLAS SCHOOL POLICY STATEMENT ON THE CHILDCARE DISQUALIFICATION BY ASSOCIATION

It is the policy of St Nicholas School to require all staff working in the Early Years Foundation Stage classes (with pupils under the age of 5) or any staff member working with pupils under the age of 8 in a child care capacity (on the school breakfast club, after school clubs or home/school transport) to declare if they live with any family member declare if they have any family member, friend or guest who may themselves be prevented from working with children due to them having any convictions or cautions (current or spent) listed on the February 2015 DFE Guidance (see appendix 4i). If a staff member declares that they live with someone who has any such conviction or caution would then come under the disqualification by association guidelines. The Senior Leadership Team will then decide, in conjunction with the staff member whether to apply for a waiver from Ofsted (see appendix 4ii) to remain in the same position(s) or whether be moved to a different position in the school/give up working within the childcare area or whether to reconsider their position to work at St Nicholas School, if considered appropriate by those involved.

If is the policy of St Nicholas School to raise the issue of the childcare disqualification by association guidance with all potential new member of staff applying to work within the EYFS department, as part of the schools' (safer) recruitment process.

Appendix 4i – DFE (February 2015) Disqualification under the Childcare Act 2006 – Statutory guidance for Local Authorities, Maintained Schools, Independent Schools, Academies and Free Schools.

Appendix 4ii – Form to apply to OfSTED for a waiver to work with child under 5 in education/under 8 in childcare situations.

Appendix 4iii – Copy of memo shared with staff about the need to declare any potential disqualification situation.

Memo

To: All staff working with pupils in the Early Years Foundation Stage and Breakfast/After School Clubs, now or in the future.

From: Senior Leadership Team and Governing Body of St Nicholas School

Date: 30 September 2022

Re: Safeguarding Rules amendments (established 2014)

Dear All

You may have become aware on the news (TV/Radio/Internet), that there are Safeguarding expectations on schools that may result in a small number staff (nationwide) being moved to different positions within their work, being suspended or dismissed from employment, due to their DBS status to work with children being affected by the cautions, convictions or care orders subjected on the people they live with/residing in their home for any current period of time.

Last year, the Safeguarding regulations that apply to Child Care were extended to Early Years Education settings for pupils 5 and under, and care provision within schools (Breakfast Club/Afterschool club) for pupils 8 and under. As part of our Safer Recruitment procedures for appointing new staff the school will ensure that no prospective employees live with associates (partners, children, friends, lodgers) who are subject to (potentially) being barred from working with children by the DBS[1]. All new staff will have to sign a document ensuring that that they do not and will not live with a party that would not be allowed to work with children themselves – whether they work in the EYFS department/school clubs or not, as at any time, we may require staff to cover in these areas.

The regulations[1] also require all existing staff members working or potentially working or supervising in these areas to certify whether they do or do not live with people who is/would be on the DBS Barred LiSt If person does/goes on to live with an associate who could be on the barred list in most schools this would result in dismissal (as their own DBS check would now fail) or, if they wish to apply to OFSTED for a waiver (although have none have currently been given), suspension until they hear if their application has been successful. This policy was introduced so as to comply with the guidance from the DFE and KCC.

NB: As a large employer, we would try to relocate within the organisation any staff who are affected by this change as far as possible, depending on advice given from the Schools Personnel Service and the offence their associate had committed. If a staff member were able to continue working for us, they would be prevented from working in the EYFS department or on the school extended day clubs/activities.

Stephen King, Deputy Headteacher

DBS SAFEGUARDING DECLARATION

I declare that I do not live with an associate who may affect the status of my DBS check to work with children in the areas of EYFS or extended schools clubs, under the DFE and OFSTED Child Care Disqualification Requirements (2014)

Signed: ----------

Staff Name: ---------- **Date:** ----------

or

- I declare that I do live with an associate who may affect the status of my DBS check to work with children in the areas of EYFS or extended schools clubs, under the DFE and OFSTED Child Care Disqualification Requirements (2014).
- I agree to provide the information required under the regulations, to St Nicholas School.
- I understand that St Nicholas School will need to investigate this information and my current work status may change as a result.
- I understand that St Nicholas School may have to share this information with other bodies, as required.

Signed: ----------

Staff Name: ---------- **Date:** ----------

Staff Personal Information Disclosure (Disqualification Requirements, 2014

Name: ----------

- Details of any order, determination, conviction, or other ground for disqualification from registration under the Childcare (Disqualification) Regulations 2009:
- Date of the order, determination or conviction, or the date when the other ground for disqualification arose:
- The body or court which made the order, determination or conviction, and the sentence (if any) impose
- Certified copy of the relevant order (in relation to an order or conviction).

Signature: ---------- **Date:** ----------

Appendix 5: SAFER RECRUITMENT AND DBS CHECKS – POLICY AND PROCEDURES

Recruitment and selection process (also see Safer Recruitment Policy)

- To make sure we recruit suitable people, we will ensure that those involved in the recruitment and employment of staff to work with children have received appropriate safer recruitment training.
- We have put the following steps in place during our recruitment and selection process to ensure we are committed to safeguarding and promoting the welfare of children.

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns
- Once we have shortlisted candidates, we will ask shortlisted candidates to:
- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
    - If they have a criminal history
    - Whether they are included on the barred list
    - Whether they are prohibited from teaching
    - Information about any criminal offences committed in any country in line with the law as applicable in England and Wales
    - Any relevant overseas information
- Sign a declaration confirming the information they have provided is true
- Sign and date their application form
- We will also consider carrying out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online

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 as accurate in respect to disciplinary investigations
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate
- Resolve any concerns before any appointment is confirmed

Interview and selection

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed we may still keep a record of the fact that vetting took place, the result of the check and recruitment decision taken
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. Where available, these will include:
    - For all staff, including teaching positions: criminal records checks for overseas applicants
    - For teaching positions: obtaining a letter of professional standing from the professional regulating authority in the country where the applicant has worked
- 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 and deputy/assistant headteachers.

We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not

carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.

Regulated activity means a person who will be:

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

Existing staff

- In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:
- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more
- We will refer to the DBS anyone who has harmed, or poses a risk of harm, to a child or vulnerable adult where:
- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

Agency and third-party staff

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

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.
- In both cases, this includes checks to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006.

Volunteers

We will:

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

- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment
- Ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we decide that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment. This will include our evaluation of any risks and control measures put in place, and any advice sought

Governors

- All governors will have an enhanced DBS check without barred list information.
- They will have an enhanced DBS check with barred list information if working in regulated activity.
- All governors will also have a section 128 check (as a section 128 direction disqualifies an individual from being a maintained school governor).

Identity

- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK

Adults who supervise pupils on work experience

- When organising work experience, we will ensure that policies and procedures are in place to protect children from harm.
- We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a pupil under 16 on work experience. This will depend on the specific circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 6: SAFEGUARDING AND CONTRACTORS

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

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

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

Managing contractors on school premises

St Nicholas school will:

- Look at several different contractors before deciding who to choose, and meet with prospective contractors to ask why they believe they would be the best fit for the project.
- Seek assurances that all contractors used by the school have been subject to the appropriate level of Disclosure and Barring Service (DBS) checks and that the contractors have appropriate child protection policies commensurate with their working practices and will follow the school Safeguarding and Health & Safety practices. The school reserves the right to refuse to work with, or end any contract, if it feels that the contractor does not observe child protection "safe" practice including referring any contractor to the LADO service if it feels that they had put a child at risk of harm.
- Use the school risk register
- Keep a risk register that is updated regularly.
- Support with health and safety issues

St Nicholas School will:

- Make sure contractors are in good financial health and are likely to remain so for the duration of the contract
- Check contractors comply with the conditions of the contract, statutory requirements and site access issues
- Ensure contractors are professional, including using safe working procedures that take staff, pupils, contractors and visitors into consideration
- Check contractors will provide data in an agreed format
- Involve specialists early in the process to ensure efficiencies throughout the project
- Check if you can use your LA's arrangements, such as their approved list of contractors

The School will:

- Make procurement decisions are based upon i) the Health and safety implications of the work in the job specification and b) the competence of the contractor
- Provide the contractor and their employees with our emergency procedures
- Consult our employees about the work and how they can raise any concerns
- Identify who will supervise the work and how
- Ensure contractors working in school must have "appropriate insurance cover", which may include:
    - Public liability insurance
    - Professional indemnity insurance
    - Contract works insurance

The School will make clear that suitable cover should be obtained **before** work commences.

Appendix 7 – SAFEGUARDING AND SCHOOL LETTINGS (SEE SCHOOL LETTINGS POLICY).

Excerpt from lettings policy:
"Where services or activities are provided separately by another body using the school facilities/premises, the headteacher and the governing body will seek written assurance that the organisations concerned have appropriate procedures in place regarding safeguarding children and vulnerable adults and/or child protection. The school will also seek assurance that relevant safeguarding checks have been made in respect of staff and volunteers. If this assurance is not achieved and application to use the premises will be refused".