



Safeguarding Policy October 2021

1. Aims

The school aims to ensure that:

Appropriate action is taken in a timely manner to safeguard and promote children's welfare
All staff are aware of their statutory responsibilities with respect to safeguarding
Staff are properly training in recognising and reporting safeguarding issues

2. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance [Keeping Children Safe in Education \(2021\)](#) and [Working Together to Safeguard Children \(2018\)](#), and the [Governance Handbook](#). We comply with this guidance and the arrangements agreed and published by our 3 local safeguarding partners.

This policy is also based on the following legislation:

Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school

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

Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18

[Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM

[The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children

Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children

[Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\) \(Extended Entitlement\) \(Amendment\) Regulations 2018](#) (referred to in this policy as the “2018 Childcare Disqualification Regulations”) and [Childcare Act 2006](#), which set out who is disqualified from working with children, where applicable.

3. Definitions

Safeguarding and promoting the welfare of children means:

Protecting children from maltreatment

Preventing impairment of children’s mental and physical health or development

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

Taking action to enable all children to have the best outcomes

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

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

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

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

Children includes everyone under the age of 18.

The following **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

Wathen Grange School being situated in Mancetter, works with and is mindful of the procedures detailed by the Warwickshire Safeguarding Together team. Our local safeguarding partners are Warwickshire Police, Warwickshire Local Authority and NHS West Midlands.

4. 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

We also recognise that there are occasions when reasonable force is appropriate and that a 'no-contact' policy can leave staff unable to fully support and protect our pupils. The decision to use reasonable force to control or restrain a child is down to the professional judgment of the staff involved and should always depend on individual circumstances. Staff working at the school are appropriately trained in the use of restrictive physical interventions and this training is reviewed annually.

5. Covid-19

Keeping Children Safe in Education (KCSIE) remains in force throughout the response to coronavirus (COVID-19). Staff and volunteers are aware that this difficult time potentially puts all children at greater risk.

Our school procedures for safeguarding children will always be compliant with the local safeguarding children's partnership.

Working in partnership with children, young people, their parents and carers and other agencies is essential in promoting children's welfare.

All staff and volunteers must continue to act on any concerns they have about a child immediately. It is still vitally important to do this, both for children at school and those at home.

Children at home will be contacted by a member of staff on a daily basis. The outcome of the phone call will be recorded on a log. If a child cannot be contacted, or a concern is raised as a result of the phone call, it is recorded. If a concern is raised, the DSL will follow the flowchart in this policy accordingly. As a reminder, all staff should continue to work with and support children's social workers, where they have one, to help protect vulnerable children.

We will have a trained DSL and/or deputy DSL on site wherever possible. Details of all important contacts are listed at the top of this document.

If a DSL is not on site, we will keep all school staff and volunteers informed on who the senior staff member is on site. The senior leader will be responsible for liaising with the off-site DSL (or deputy) to make sure they (the senior leader) can:

- Identify the most vulnerable children in school
- Update and manage access to child protection files, where necessary
- Liaise with children's social workers where they need access to children in need and/or to carry out statutory assessments

We will continue to take our attendance register. We will follow guidance from the Department for Education on how to record attendance (including for pupils learning remotely) and what data to submit.

Where any child we expect to attend school doesn't attend, or stops attending, we will:

- Follow up on their absence with their parents or carers, by contacting the family by phone call.
- Notify their social worker, where they have one.

We will make arrangements with parents and carers to make sure we have up-to-date emergency contact details, and additional contact details where possible.

Staff should continue to act on any concerns they have immediately – whether those concerns are about staff/supply teachers/volunteers working on site or remotely.

We will continue to refer adults who have harmed or pose a risk of harm to a child or vulnerable adult to the Disclosure and Barring Service (DBS).

We will continue to refer potential cases of teacher misconduct to the Teaching Regulation Agency. We will do this using the email address Misconduct.Teacher@education.gov.uk for the duration of the COVID- 19 period, in line with government guidance.

The school will maintain contact with children who are at home. Staff will contact children directly to at home to help identify any concerns on a regular basis. They will use work phones.

Staff and volunteers will look out for signs like:

- Not completing assigned work or logging on to school systems.
- No contact from children or families.
- Seeming more withdrawn during any well-being check-ins.

Where staff are interacting with children online, they will continue to follow our existing Code of Conduct and Acceptable Use Policy.

Refer to Remote Learning Policy for acceptable use of technology during remote learning.

We will make sure children know how to report any concerns they have back to our school, and signpost them to other sources of support too.

We will make sure parents and carers:

- Are aware of the potential risks to children online and the importance of staying safe online via our remote learning policy.
- Know what our school is asking children to do online, where relevant, including what sites they will be using and who they will be interacting with from our school.
- Know where else they can go for support to keep their children safe online.
Pupil, parent or carer have been signposted to organisations to contact if there are concerns about mental

health and wellbeing.

Staff and volunteers will be aware of the possible effects that this period may have on pupils' mental health. They will look out for behavioural signs, including pupils being fearful, withdrawn, aggressive, oppositional or excessively clingy, to help identify where support may be needed.

New staff and volunteers will continue to receive a safeguarding induction in line with the expectations of Keeping Children Safe in Education.

6. Roles and responsibilities

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

6.1 All staff

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

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

All staff will be aware of:

Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, the online safety policy and the safeguarding response to children who go missing from education

The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment

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

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

The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer- on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation

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

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

6.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Mr Rob Maddox, Head Teacher. 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.

When the DSL is absent, the deputy DSL – Cheryl Marsden or Mick Finnie – will act as cover.

If the DSL and deputy are not available, the operations director will act as cover (for example, during out-of- hours/out-of-term activities).

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

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

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

6.3 The board of directors

The board of directors will:

Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront 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

Appoint a senior board level lead to monitor the effectiveness of this policy in conjunction with the full board of directors. This is always a different person from the DSL

The operations director 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 directors will read Keeping Children Safe in Education 2021 in its entirety.
Section 15 of this policy has information on how directors are supported to fulfil their role.

6.4 The headteacher

The headteacher is responsible for the implementation of this policy, including ensuring that staff (including temporary staff) and volunteers:

- Are informed of our systems which support safeguarding, including this policy, as part of their induction
- Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect

Communicating this policy to parents/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)

Ensuring the relevant staffing ratios are met, where applicable

7. Confidentiality

The school is mindful of the following principles in respect of confidentiality and safeguarding: 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

The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputy)

Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in appendix 3

8. Recognising abuse and taking action

Staff, volunteers and directors 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)".

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

Referrals following specific incidents should be made IMMEDIATELY. If staff become aware of possible abuse, they must make the DSL aware by completing a concern form before the child leaves the school. Staff should ensure that they are available for follow up should there need to be further investigation during the course of the day.

Where concern has built over a period of time, referral may be delayed, but no more than 24 hours and the pupil MUST not be in any IMMEDIATE danger. However, you must avoid long delays, based on the fact that you cannot obtain a DSL agreement within the time scales above. If such a delay is likely, you must make the referral yourself.

Decisions regarding photographic recording of evidence and full medical examinations should be left to the experts. Staff should not ask to see evidence of bruising or wounding. All records should be given to the DSL and may be passed to Social Services when a referral is made. In cases which are taken to court, the school may be required to provide these records. All child protection records are placed in the pupil's file. These files are kept in lockable filing cabinets in the office.

In the absence of a DSL/DDS, anyone can make a referral. If a child is in immediate danger or is at risk of harm, a referral should be made to children's social care and/or the police immediately.

In all cases where the member of staff who makes this referral is not the DSL, that member of staff should inform the DSL at the first possible opportunity.

REFERRALS SHOULD BE MADE TO:

First Response Pupils Duty 24/7 for immediate response: 01926 410410 and 999 if the young person is at immediate risk of serious harm.

Warwickshire Safeguarding Team

lado@warwickshire.gov.uk

Telephone: 01926 410410

8.2 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.

8.3 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 must speak to the DSL and follow our local safeguarding procedures and make a referral to Warwickshire MASH, see section 7.1 above for contact details.

It has been agreed that regulated professionals with this duty will do the following in Warwickshire:

- Call 101, outlining that this is an FGM referral reporting under the mandatory reporting duty, and providing the necessary information requested.
- Ring 999 if you believe that a girl has been recently cut, or she is at imminent risk of FGM

Our local safeguarding team is [Warwickshire Safeguarding Team](#)

lado@warwickshire.gov.uk

Telephone: 01926 410410

1. **8.4 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

The school will use, wherever necessary, the Early Help Assessment (Common Assessment Framework) in order to support a child's wellbeing. Early Help will be adopted when there are concerns about a child's progress in terms of their health, welfare, behaviour or progress and where there are concerns about significant factors and where it is deemed that a child's needs are unclear or broader than a single service can address. In exceptional circumstances, such as in emergency or a genuine concern that appropriate action has not been taken, staff members can refer directly to children's social care.

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 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.

If you are not happy with the response received from children's social care, please follow the Warwickshire escalation policy, which can be found below:

<https://lrsb.org.uk/>

8.5 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 directors 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

8.6 If you have a mental health concern

All staff have engaged in mental wellbeing in children and young people training and are vigilant and aware of 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. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Staff are mindful and have an increased awareness of how these experiences, can impact on mental health, behaviour, and education.

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.

Staff are also mindful and considerate of the long-term effects of C-19 lockdowns, isolations and remote education may have on pupils returning to school. If staff have a mental health concern about a child that is also a safeguarding concern, immediate action should be taken, following this policy and speaking to the DSL.

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)

Actions where there are concerns about a child



8.7 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 operations director.

The headteacher/operations director will then follow the procedures set out in appendix 3, if appropriate.

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

The Warwickshire LADO (Local Authority Designated Officer) dealing with allegations against members of staff can be contacted on **01926 410410**. **The designated officer is Adrian Over.**

8.8 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 peer-on-peer abuse. However, all peer-on-peer 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 peer-on-peer abuse.

Procedures for dealing with allegations of peer-on-peer 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

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

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

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

To achieve this, we will:

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

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

Ensure our curriculum helps to educate pupils about appropriate behaviour and consent

Ensure pupils are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

Ensure staff reassure victims that they are being taken seriously Ensure staff are trained to understand:

- How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports
- That even if there are no reports of peer-on-peer 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 peer-on-peer 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

8.9 Sharing of nudes and semi-nudes (‘sexting’)

Your responsibilities when responding to an incident

If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as ‘sexting’ or ‘youth produced sexual imagery’), you must report it to the DSL immediately.

You must **not**:

View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you

have already viewed the imagery by accident, you must report this to the DSL) Delete the imagery or ask the pupil to delete it

Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)

Share information about the incident with other members of staff, the pupil(s) it involves or their, or other, parents and/or carers

Say or do anything to blame or shame any young people involved

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

Initial review meeting

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

Whether there is an immediate risk to pupil(s)
If a referral needs to be made to the police and/or children's social care

If it is necessary to view the image(s) in order to safeguard the young person (in most cases, images or videos should not be viewed)

What further information is required to decide on the best response

Whether the image(s) has been shared widely and via what services and/or platforms (this may be unknown)

Whether immediate action should be taken to delete or remove images or videos from devices or online services

Any relevant facts about the pupils involved which would influence risk assessment If there is a need to contact another school, college, setting or individual

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

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

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

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

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

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

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

Further review by the DSL

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

They will hold interviews with the pupils involved (if appropriate).

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

Informing parents/carers

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

Referring to the police

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

Recording incidents

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

Curriculum coverage

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our relationships and sex education, personal, social, health and economic and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

What it is

How it is most likely to be encountered

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

Issues of legality

The risk of damage to people's feelings and reputation Pupils also learn the strategies and skills needed to manage:

Specific requests or pressure to provide (or forward) such images

The receipt of such images

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

7.10 Reporting systems for our pupils

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

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

To achieve this, we will:

Put systems in place for pupils to confidently report abuse

Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils

Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback

Pupils are encouraged to report any concerns they have to a member of staff.

Pupils are made aware of the reporting systems and processes through discussion in tutor times, assemblies, 1:1 session with staff, signs around the school building and in the relationship/sex education curriculum.

9. Contextual safeguarding

“Contextual Safeguarding is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent- child relationships.

Therefore, children's social care practitioners, child protection systems and wider safeguarding partnerships need to engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices. Contextual Safeguarding, therefore, expands the objectives of child protection systems in recognition that young people are vulnerable to abuse beyond their front doors.”
<https://contextualsafeguarding.org.uk/>

Safeguarding incidents and/or behaviours can be associated with factors outside of the school, for example factors specific to the local community and population. When assessing, planning or implementing

safeguarding policies, protocols and procedures, staff consider a range of contextual factors contributing to the risk of the individual's safety, wellbeing and welfare. When making a referral or sharing information with agencies, these risks must also be considered and well documented.

We work with local safeguarding teams to promote assessing risk by considering Context Interplay and Context Weighting; broaden understanding of the 'capacity to safeguard'; promote safeguarding as 'everybody's responsibility'; acknowledge that safeguarding is about the creation of safe spaces (in addition to making referrals and sharing information); assess peer relationships and extra-familial contexts in order to build support plans. For more information, please refer to “The legal and policy framework for Contextual Safeguarding approaches: A 2020 update on the 2018 legal briefing.” (Firmin and Knowles 2020).

Understanding the contextual safeguarding risks means that we can respond to the experiences which young people face in their wider extra-familial environment. The safeguarding team, along with

all school staff, are aware of the potential risks and that pupils may be vulnerable to multiple harms beyond the home. Although our pupil population is drawn from a variety of boroughs, there are contextual risks associated with Coventry and other LEA's. These include domestic abuse, harmful sexual behaviour and, in some locations, CCE.

10. Online safety and the use of mobile technology

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

To address this, our school aims to:

Have robust processes in place to ensure the online safety of pupils, staff, volunteers and directors.

Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')

Set clear guidelines for the use of mobile phones for the whole school community

Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

The 4 key categories of risk

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

Content – being exposed to illegal, inappropriate or harmful content, such as pornography, fake news, racism, misogyny, self-harm, suicide, anti-Semitism, radicalisation and extremism

Contact – being subjected to harmful online interaction with other users, such as peer-to-peer pressure, commercial advertising and adults posing as children or young adults with the intention to groom or exploit them for sexual, criminal, financial or other purposes

Conduct – personal online behaviour that increases the likelihood of, or causes, harm, such as making, sending and receiving explicit images (e.g. consensual and non-consensual sharing of nudes and semi-nudes and/or pornography), sharing other explicit images and online bullying; and

Commerce – risks such as online gambling, inappropriate advertising, phishing and/or financial scams **To meet our aims and address the risks above we will:**

Educate pupils about online safety as part of our curriculum. For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online

- How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim

Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year

Educate parents/carers about online safety via our website and communications sent directly to them. We will also share clear procedures with them, so they know how to raise concerns about online safety

Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:

- Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
- Staff will not take pictures or recordings of pupils on their personal phones or cameras

Make all pupils, parents/carers, staff, volunteers and directors aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology

Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones

Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)

Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems

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

11. 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.

12. Pupils with special educational needs, disabilities or health issues

All of our pupils have special educational needs. We recognise that they can therefore face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's 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 disproportionately impacted by behaviours such as bullying, without outwardly showing any signs

Communication barriers and difficulties in managing or reporting these challenges We offer pastoral support to all our pupils.

13. Pupils with a social worker

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

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

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

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

14. Looked-after and previously looked-after children

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

Appropriate staff have relevant information about children looked after legal status, contact arrangements with birth parents or those with parental responsibility, and care arrangements.

The DSL has details of children's social workers and relevant virtual school heads.

We have appointed an appropriately trained teacher, Mr Rob Maddox to take the lead on promoting the educational achievement of looked-after and previously looked-after children.

As part of their role, they will:

Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children

15. Complaints and concerns about school safeguarding policies

15.1 Complaints against staff

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

15.2 Other complaints

All complaints arising from the operation of this policy will be considered under the school's complaints policy.

15.3 Whistle-blowing

Anyone can call the NSPCC's whistle blowing advice line if they have a concern about a child and how that is being handled. The NSPCC advises professional to contact the advice line as soon as they believe:

- Their own or another employer will cover it up or not address the concerns.
- Their employer will treat them unfairly for complaining.
- The concern has not been sorted out to an acceptable outcome.

The DSL and all members of staff will work with and support social workers to help protect vulnerable children. Where we are aware that a pupil has a social worker, the DSL will always consider this fact to ensure any decisions are made in the best interests of the pupil's safety, welfare and educational outcomes. For example, it

Potential failures in a school's safeguarding regime

The advice line provides free help and advice to people who suspect their organisation might be putting children at risk, even if they are not certain this is the case. You can call the advice line about an incident that happened in the past, is happening now, or you believe might happen in the future. This advice line is NOT intended to replace the current safeguarding practices and responsibilities of the school. The NSPCC whistle blowing advice line can be contacted on 0800 028 0285.

For further information on whistleblowing, please see the school's confidential reporting policy.

16. Record-keeping

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

Records will include:

A clear and comprehensive summary of the concern

Details of how the concern was followed up and resolved

A note of any action taken, decisions reached and the outcome

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

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

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

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

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

While it is usually good practice to seek consent for making any referral, there are some exceptions when it comes to safeguarding concerns. For example, you do not need consent if having a

conversation with the family would place the child / young person or someone else at increased risk of suffering harm. There is no need to seek consent if doing so might undermine the investigation of a serious crime. This includes making a child protection referral for a child / young person who has made an allegation about a physical or sexual assault by a parent or carer, or where a delay in getting consent may mean the child / young person is put at further risk of harm.

There may be occasions, such as criminal investigation or Local Authority proceedings, which require an element of confidentiality from the family involved. Any professional ambiguity should be clarified with the relevant agency to ensure that investigations or proceedings are not compromised. For further advice about information sharing please go to:

<https://www.gov.uk/government/publications/safeguarding-practitioners-information-sharing-advice>

In addition:

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

Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

17. Training

17.1 All staff

All staff members will undertake safeguarding and child protection training at induction, including on 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).

Volunteers will receive appropriate training, if applicable.

17.2 The DSL and deputy

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

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

They will also undertake Prevent awareness training.

17.3 Directors

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

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

17.4 Recruitment – interview panels

At least one person conducting any interview for any post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of Keeping Children Safe in Education 2021, and will be in line with local safeguarding procedures.

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

18. Monitoring arrangements

This policy will be reviewed **annually** by the headteacher. At every review, it will be approved by the full board of directors.

19. Links with other policies

This policy links to the following policies and procedures: Behaviour

Staff code of conduct
Complaints
Health and safety
Attendance

Online safety
Mobile phone use
Equality
Relationships and sex education
First aid
Curriculum
Privacy notices
Confidential reporting
IT acceptable use

The designated Safeguarding Lead(s) in this school is:

Rob Maddox

The Deputy Designated Safeguarding Leads in this school is:

Cheryl Marsden and Mick Finnie

The nominated Director for Safeguarding is:

Mr V. Mangat

The Chair of Governors is Mr V. Mangat

Adopted by Directors on: 01.10.21

Signed:

Next Review July 2022