



London Christian Learning Centre Safeguarding Policy

Incorporating our Child Protection Policy,
Safer Recruitment Policy

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SAFEGUARDING POLICY
Incorporating our Child Protection Policy, Safer Recruitment Policy, E-Safety Policy and 'Sexting' Policy

This document has been reviewed with reference to the documents *Keeping Children Safe in Education* (2016), *The Prevent Duty, Departmental advice for schools and childcare providers, July 2015*, *Working Together to Safeguard Children 2015* and *The Children Act 2004*. These documents are kept on file in the school.

SCHOOL STATEMENT

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 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 terms 'child' and 'children' includes everyone under the age of 18.

The Governors/Trustees take seriously their responsibility to protect and safeguard the welfare of children and young people entrusted to the school's care. The Governors/Trustees will ensure that persons with leadership and management responsibilities at the school demonstrate good skills and knowledge appropriate to their role and fulfil their responsibilities effectively so that the independent school standards are met consistently; and actively promote the well-being of pupils according to section 10(2) of the Children Act 2004(a).

London Christian Learning Centre is a Safeguarding School. We will invoke Child Protection Procedures where necessary.

Our Designated Safeguarding Lead is Rev. Ida Bolus. His/her* role is to provide support and direction to staff members to carry out their safeguarding duties and to liaise closely with other services such as children's social care, the Local Authority Designated Officer (LADO), the DBS and the police when managing referrals. As well as working closely with the principal.

Our Deputy Designated Safeguarding Lead is Rev. Timothy Bolus. His/her* role is to provide support to the Lead and be available if the Lead is unavailable.

Our Chair of Governors/Trustees is Maricor Balinbin. His/her* role in Safeguarding is to take the lead in dealing with allegations of abuse made against the Principal/Head Teacher*.

Our Principal/Head Teacher is Rev. Ida Bolus. His/her* role in Safer Recruitment is to ensure that the school operates safe recruitment procedures and makes sure that all appropriate checks are carried out on staff and volunteers who work with the children.

All staff members in the school must read the content of the policy. The *Teacher Standards 2012* states that teachers, including head teachers, should safeguard children's wellbeing and maintain public trust in the teaching profession as part of their professional duties.

All staff must undertake a regular course on safeguarding and child protection that must be updated regularly. The School is committed to an on-going training programme on such matters. Yearly updates will be undertaken at the beginning of each school year.

All staff must read Part 1 and Appendix A "Further Information", of Keeping Children Safe in Education (2016). The school has systems in place to assist staff understand and discharge their role and responsibilities".

The Governors/Trustees recognise the need to build constructive links with childcare agencies, and will work with social care, the police, health services and other services to promote the welfare of children and protect them from harm.

The Governors/Trustees are committed to:

- Listening to, relating effectively and valuing children and young people whilst ensuring their protection within school activities.
- Ensuring safeguarding is taught 'as part of providing a broad and balanced curriculum'
- Employing the expertise of the staff when reviewing safeguarding policies and providing opportunities for staff to contribute to and shape safeguarding arrangements and the child protection policy.
- Encouraging and supporting parents/carers
- Ensuring that staff members are given support and training
- Having a system for dealing with concerns about possible abuse
- Maintaining good links with the statutory child care authorities

Where a child is suffering significant harm, or is likely to do so, action will be taken to protect that child. Action will also be taken to promote the welfare of a child in need of additional support, even if they are not suffering harm or are at immediate risk.

Everyone who encounters children and their families has a role to play in safeguarding children. Anyone working in the school is particularly important as they are in a position to identify concerns early and provide help for children, to prevent concerns from escalating; they form part of the wider safeguarding system for children. For a description of this system, see *Working Together to Safeguard Children 2015*.

All staff members have a responsibility to provide a safe environment in which children can learn. They have a responsibility to identify children who may be in need of extra help or who are suffering, vulnerable, or are likely to suffer, significant harm. Staff have a responsibility to review and monitor the list of these students on a regular basis and all staff members then have a responsibility to take appropriate action, working with other services as needed, including Early Help.

Early Help is used to describe the process of taking action early and as soon as possible to tackle problems emerging for children, young people and their families. Effective help can occur at any point in a child or young person's life. Staff should be able to identify the vulnerable children in the school who need who need this level of support. These children should be identified and monitored. Staff need to understand the difference between a safeguarding concern and a child in immediate danger or at significant risk of harm, as part of identifying vulnerable learners.

In addition to working with the designated safeguarding lead staff, staff members should be aware that they might be asked to support social workers to take decisions about individual children.

All staff members should make themselves aware of the systems within the school that support safeguarding, which are explained in the staff induction. This includes the school's safeguarding and child protection policy; the staff code of conduct; and the designated safeguarding lead.

Staff members should be aware of the signs of abuse and neglect so that they are able to identify cases of children who may be in need of help or protection. Knowing what to look for is vital to the early identification of abuse and neglect. If staff members are unsure they should always speak to children's social care.

Staff members should be aware of any signs of extremist views of any kind in our school, whether from internal sources –students, staff or Governors/Trustees, or external sources - school community, external agencies or individuals. Our students see our school as a safe place where they can explore controversial issues safely and where our teachers encourage and facilitate this – we have a duty to ensure this happens.

Staff members are advised to maintain an attitude of 'it could happen here' where safeguarding is concerned. When concerned about the welfare of a child, staff members should always act in the interests of the child.

A child going missing from an education setting is a potential indicator of abuse or neglect. Staff members should follow the school's procedures for dealing with children who go missing, particularly on repeat occasions. They should act to identify any risk of abuse and neglect, including sexual abuse or exploitation. More information can be found in this policy about children who run away or go missing from home or care.

If staff members have concerns about a child they should raise these with the school's designated safeguarding lead. This also includes situations of abuse that may involve staff members. The safeguarding lead will usually decide whether to make a referral to children's social care, although any staff member can refer their concerns to children's social care directly. Where a child and family would benefit from co-ordinated support from more than one agency (for example education, health, housing, police) an inter-agency assessment will be conducted. These assessments, undertaken by a lead professional (a teacher, special educational needs co-ordinator, General Practitioner (GP), family support worker, and/or health visitor), will identify what help the child and family require to prevent needs escalating to a point where intervention would be needed via a statutory assessment under the Children Act 1989.

A concern is when you are troubled about a child's welfare and you have reasonable cause to suspect a child is suffering, or likely to suffer, significant harm. It involves the child's safety and well-being.

If, at any point, there is a risk of immediate serious harm to a child a referral should be made to children's social care immediately. Anybody can make a referral. If the child's situation does not appear to be improving, the staff member with concerns should press for re-consideration. Concerns should always lead to help for the child at some point.

It is important for children to receive the right help at the right time to address risks and prevent issues escalating. Research and Serious Case Reviews have repeatedly shown the dangers of failing to take effective action. Poor practice includes: failing to act on and refer the early signs of abuse and neglect, poor record keeping, failing to listen to the views of the child, failing to re-assess concerns when situations do not improve, sharing information too slowly and a lack of challenge to those who appear not to be taking action.

SAFER WORKING PRACTICES

The school has regard to the ***Guidance for Safer Working Practices 2015*** underpinning principles as follows:

- The welfare of the child is paramount
- Staff should understand their responsibilities to safeguard and promote the welfare of pupils
- Staff are responsible for their own actions and behaviour and should avoid any conduct which would lead any reasonable person to question their motivation and intentions
- Staff should work, and be seen to work, in an open and transparent way
- Staff should acknowledge that deliberately invented/malicious allegations are extremely rare and that all concerns should be reported and recorded
- Staff should discuss and/or take advice promptly from the headteacher if they have acted in a way which may give rise to concern
- Staff should apply the same professional standards regardless of culture, disability, gender, language, racial origin, religious belief and sexual orientation
- Staff should not consume or be under the influence of alcohol or any substance, including prescribed medication, which may affect their ability to care for children
- Staff should be aware that breaches of the law and other professional guidelines could result in disciplinary action being taken against them, criminal action, and/or other proceedings including barring by the Disclosure & Barring Service (DBS) from working in regulated activity, or for acts of serious misconduct prohibition from teaching by the National College of Teaching & Leadership (NCTL).
- Staff and managers should continually monitor and review practice to ensure this guidance is followed
- Staff should be aware of and understand their establishment's child protection policy, arrangements for managing allegations against staff, staff behaviour policy, whistle blowing procedure and their Local Safeguarding Children Board LSCB procedures.

Staff should make themselves familiar with the following school documents and policies:

- Staff Handbook
- Anti-Harassment and Bullying Policy
- Appointment of Staff Policy, incorporating Equal Opportunities in Employment Policy
- Code of Conduct Policy
- Grievance Procedure
- Management of Staff Absence Policy
- Staff Appraisal and Capability Policy
- Staff Discipline Policy
- Whistleblowing Policy
- Data Protection Policy

- Fire Safety Policy
- First Aid Policy
- Food Hygiene Policy
- Health and Safety Policy
- Intimate Care and Toileting Policy (*Delete if not EYFS*)
- Risk Assessment Policy
- Risky Areas Policy (*Delete if the school does not need this policy*)
- Anti-bullying Policy
- Behaviour Policy
- Complaints Procedure
- Confidentiality Policy
- Equal Opportunities Policy
- Exclusions Policy
- Late and Uncollected Children Policy
- Looked After Children
- Missing Child Policy
- Misuse of Substances and Drugs Policy
- Physical Interventions
- School Trips and Educational Visits Policy
- SEND Policy
- Sex and Relationship Policy

KEY TRAINING AREAS

Timescale for training

Induction Training (mandatory)	Prior to starting at the school
Child Protection Awareness training for whole staff including Safeguarding (statutory)	Every two years with refresher training every other year
Designated Safeguarding Lead Training (statutory)	Every two years with refresher training every other year
Safer Recruitment Training (statutory)	Every two years
Training about preventing terrorism (statutory)	Annually
Training for School Governors (non-statutory)	Annually
Female Genital Mutilation	Every two years
Child Sexual Exploitation	Every two years
E-Safety	Annually

IMPORTANT CONTACT DETAILS:

Safeguarding incidents could happen anywhere and staff should be alert to possible concerns being raised in this school

Safeguarding concerns about adults in the school should be made to the Designated Safeguarding Lead or to the Principal/Head Teacher*
Safeguarding concerns about independent school proprietors should go straight to the Local Authority Designated Officer - the LADO.

To contact the following staff members please call 020 8553 7797:

Rev. Ida Bolus - the Designated Safeguarding Lead Person for Child Protection
Rev. Timothy Bolus- the Designated Deputy Lead Person for Child Protection
Myla Castro – The Chair of the Trustees
Rev. Ida Bolus and Elisa Velasquez - The Principal/Head Teacher and Safer Recruitment Officer

All staff members may raise concerns directly with Children’s Social Care services

The school will work with the Local Authority Designated Officer (LADO) as deemed appropriate. The LADO provide advice and guidance to employers and voluntary organisations that have concerns about a person working or volunteering with children and young people who may have behaved inappropriately or you have received information that may constitute an allegation.

For further advice or help contact:

- The NSPCC Helpline: 0808 800 5000
- The NSPCC whistle-blowing helpline: 0800 028 0285
- The Police: 101 to report crime and other concerns that do not require an emergency response; 999 when there is danger to life or when violence is being used or threatened
- CCPAS: 0845 120 45 50 or 01322 517817

TIMESCALES

An Initial Assessment should be initiated by the DSL or Deputy DSL within 24 hours of receipt of a referral and completed in a maximum of **10 working days**. However, this may depend on the case and the other agencies involved.

An initial assessment is deemed to be completed once the assessment has been discussed with the child and family (or caregivers) and the DSL or Deputy DSL has viewed and authorised the assessment.

The initial assessment period may be very brief if the criteria for initiating Local Authority involvement are met, i.e. it is suspected that the child is suffering, or is likely to suffer significant harm and a strategy discussion should take place.

Any extension to time-scale should be authorised by the DSL or Deputy DSL, with reasons recorded and any delay must be consistent with the welfare of the child.

See *Appendix 4* Referral Flowchart

CHILD PROTECTION POLICY

The Governors/Trustees recognise that many children and young people today are the victims of neglect, and physical, sexual and emotional abuse, including extremism and radicalisation. Accordingly, the Governors/Trustees have adopted the policy contained in this document, (hereafter “the policy”). The policy sets out agreed guidelines relating to the following areas:

- The Prevent Duty
- Definitions of abuse
- Responding to allegations of abuse, including those made against teachers in the school.
- Appointing teachers/assistants
- Supervision of activities and practice issues
- Helping victims of abuse
- Working with offenders
- Safer Recruitment including the level of DBS checks that will be undertaken for volunteers and Trustees

THE PREVENT DUTY

From Wednesday 1 July 2015, all schools and childcare providers must have due regard to the need to prevent people being drawn into terrorism.

The Governmental definition of extremism is:

‘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; and/or calls for the death of members of our armed forces, whether in this country or overseas’.

Schools and EYFS providers have a critical part to play. In England, the Early Years Foundation Stage (EYFS) accordingly places clear duties on providers to keep children safe and promote their welfare. To protect children in our care, we must be alert to any safeguarding and child protection issues in the child’s life at home or elsewhere.

As a school and EYFS provider, we are expected to demonstrate activity in the following areas:

- Assessing the risk of children being drawn into terrorism.
- Demonstrate that they are protecting children and young people from being drawn into terrorism by having robust safeguarding policies.
- Ensure that their safeguarding arrangements take into account the policies and procedures of the Local Safeguarding Children Board.
- Make sure that staff have training that gives them the knowledge and confidence to identify children at risk of being drawn into terrorism, and to challenge extremist ideas which can be used to legitimise terrorism
- Expected to ensure children are safe from terrorist and extremist material when accessing the internet

London Christian Learning Centre holds a separate Preventing Extremism and Radicalisation Policy with regard to this.

The full Government Prevent Strategy can be viewed at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/97976/prevent-strategy-review.pdf

The full Government Prevent Duty (2015) can be viewed at:
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/439598/prevent-duty-departmental-advice-v6.pdf

The Role of the Curriculum

We will work to ensure that our pupils will be skilled and equipped to be resilient and resist involvement in extreme or radical activities. Therefore we recognise the need to build resilience in our pupils to make them less vulnerable.

We will therefore provide a broad and balanced curriculum within which we aim to support pupils, Spiritual, Moral, Social and Cultural development (SMSC). SMSC development is promoted through all our subjects, including the ethos of our school where development of positive attitudes and values is central to everything we do.

Values underpinning public life in the UK have been summarised as democracy, the rule of law, individual liberty, mutual respect, and the tolerance of those with different faiths and beliefs. It is important that our pupils understand this through different approaches using a balanced and broad curriculum. This supports our pupils to be responsible citizens and prepares for an adult life living and working in Britain which is diverse and changing.

Our goal is to build mutual respect and understanding and to promote the use of dialogue not violence as a form of conflict resolution. We will achieve this by using a curriculum that includes:

- Citizenship programmes
- Open discussion and debate
- Work on anti-violence and a restorative approach addressed throughout curriculum
- Focussed educational programmes

We will also work with local partners, families and communities in our efforts to ensure our school understands and embraces our local context and values in challenging extremist views and to assist in the broadening of our pupil's experiences and horizons. We will help support students who may be vulnerable to such influences as part of our wider safeguarding responsibilities and where we believe a pupil is being directly affected by extremist materials or influences we will ensure that that pupil is offered mentoring.

SIGNIFICANT HARM

Some children are in need because they are suffering or likely to suffer significant harm. The Children Act 1989 introduced the concept of significant harm as the threshold that justifies compulsory intervention in family life in the best interests of children. Decisions about significant harm should be informed by a careful assessment of the child's circumstances and discussion between statutory agencies and with the child and family.

DEFINITIONS OF ABUSE

The following definitions of child abuse are taken from the document *'Keeping Children Safe in Education'* (2016):

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. Children may be abused in a family or in an institutional or community setting by those known to them or, more rarely, by others (e.g. via the internet). They may be abused by an adult or adults or another child or children.

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

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.

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.

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.

SPECIFIC SAFEGUARDING ISSUES

Learners with SEN and Disabilities

Learners with SEN and disabilities have additional safeguarding vulnerabilities:

- Disabled children are at significantly greater risk of physical, sexual and emotional abuse and neglect than non-disabled children
- Disabled children at greatest risk of abuse are those with behaviour/conduct disorders. Other high-risk groups include children with learning difficulties/disabilities, children with speech and language difficulties, children with health-related conditions and deaf children.
- Disabled children are more likely to be abused by someone in their family compared to non-disabled children. The majority of disabled children are abused by someone who is known to them.
- Bullying is a feature in the lives of many disabled children
- Disabled children are more likely to experience the negative aspects of social networking sites than non-disabled children
- Disabled children (and severely disabled children even more so) may disclose less frequently and delay disclosure more often compared to typically developing children. Disabled children are most likely to turn to a trusted adult they know well for help such as family, friend or teacher

Disabled children are at greater risk of abuse and significant barriers can exist to their safeguarding and wellbeing. Understanding a child's needs, building on their strengths, overcoming the barriers and developing innovative solutions for meeting the challenges will not only enhance the child's wellbeing and protection from abuse but will provide learning that may also be of benefit for non-disabled children. Disabled children have an equal right to protection from abuse.

Children Missing from Education

A child going missing from education is a potential indicator of abuse or neglect. School staff should follow the school's procedures for dealing with children that 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 their going missing in future.

The school has a ***Child Missing from Education*** policy, written in accordance with the *Children Missing Education Statutory Guidance for Local Authorities - September 2016*, which we will abide by concerning this area.

The school has in place appropriate safeguarding policies, procedures and responses for children who go missing from education, particularly on repeat occasions.

Child Sexual Exploitation

Child Sexual Exploitation (CSE) is a form of child sexual abuse. It occurs where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person under the age of 18 into sexual activity (a) in exchange for something the victim needs or wants, and/or (b) for the financial advantage or increased status of the perpetrator or facilitator. The victim may have been sexually exploited even if the sexual activity appears consensual. Child sexual exploitation does not always involve physical contact; it can also occur through the use of technology.

Child Sexual Exploitation (CSE) involves exploitative situations, contexts and relationships where young people receive something (for example food, accommodation, drugs, alcohol, gifts, money or in some cases simply affection) as a result of engaging in sexual activities. Sexual exploitation can take many forms ranging from the seemingly 'consensual' relationship where sex is exchanged for affection or gifts, to serious organised crime by gangs and groups. What marks out exploitation is an imbalance of power in the relationship. The perpetrator always holds some kind of power over the victim, which increases as the exploitative relationship, develops. Sexual exploitation involves varying degrees of coercion, intimidation or enticement, including unwanted pressure from peers to have sex, sexual bullying including cyberbullying and grooming. However, it also important to recognise that some young people who are being sexually exploited do not exhibit any external signs of this abuse.

The school holds the following document on file if ever the need arises for such information: "Child Sexual Exploitation Definition and Guide Feb 2017".

Peer-on-Peer Abuse

Peer-on-peer abuse:

- features physical, emotional, sexual and financial abuse of young people by their peers,
- can impact any young person, although the characteristics/experiences of some can be exploited by their peers, or missed by services, making them more vulnerable to abuse than others
- is influenced by the nature of the environments in which young people spend their time - home, school, peer group and community - and is built upon notions of power and consent. Power imbalances related to gender, social status within a group, intellectual ability, economic wealth, social marginalisation etc., can all be used to exert power over a peer.
- can affect any child/young person, sometimes vulnerable children are targeted. For example:
 - Those living with domestic abuse or intra-familial abuse in their histories
 - Young people in care
 - Those who have experienced bereavement through the loss of a parent, sibling or friend
 - Black and minority ethnic children are under identified as victims but are over identified as perpetrators
 - Those with SEND
- hinges upon young people's experiences of power, and ultimately the notion of consent
- concepts of abuse are built upon notions of 'power' and therefore 'consent', not to be confused with the age of consent to sexual activity:

- young people over the age of consent (16 and 17 year olds) can be abused by their peers
- Many young people who abuse their peers are themselves below the age of consent
- abuse is abuse and should never be tolerated or passed off as "banter" or "part of growing up"
- both girls and boys experience peer on peer abuse however they are likely to experience it differently i.e. girls being sexually touched/assaulted or boys being subject to homophobic taunts/initiation/hazing type (rituals and other activities involving harassment, abuse or humiliation used as a way of initiating a person into a group) violence
- involves someone who abuses a 'vulnerability' or power imbalance to harm another, and have the opportunity or be in an environment where this is possible.
- While perpetrators of peer on peer abuse pose a risk to others they are often victims of abuse themselves.

Above information is based on information in Practitioner Briefing: What is peer on peer abuse? MsUnderstood Partnership (2015)

Actions the school will take

The school deals with a wide continuum of children's behaviour on a day to day basis and most cases will be dealt with via school based processes. These are outlined in the following policies:

- Behaviour & Anti-Bullying Policy
- E-Safety Policy
- Attendance Policy
- Relationships and Sex Education Policy

The school will also act to minimise the risk of peer on peer abuse by ensuring the establishment provides a safe environment, promotes positive standards of behaviour, has effective systems in place where children can raise concerns and provides safeguarding through the curriculum via PSHE and other curriculum opportunities. This may include targeted work with children identified as vulnerable or being at risk and developing risk assessment and targeted work with those identified as being a potential risk to others.

Action on serious concerns

The school recognises that children may abuse their peers physically, sexually and emotionally; this will not be tolerated or passed off as 'banter' or 'part of growing up'. The school will take this as seriously as abuse perpetrated by an adult, and address it through the same processes as any safeguarding issue. We also recognise that children who abuse others are also likely to have considerable welfare and safeguarding issues themselves.

Peer to peer abuse may be a one off serious incident or an accumulation of incidents. Staff may be able to easily identify some behaviour/s as abusive however in some circumstances it may be less clear. In all cases the member of staff should discuss the concerns and seek advice from the Designated Safeguarding Lead (DSL).

When an allegation is made by a student against another student, members of staff should consider if the issues raised indicate that the child and /or alleged perpetrator may have emerging needs, complex/serious needs or child protection concerns.

Any suspicion or allegations that a child has been sexually abused or is likely to sexually abuse another child (or adult) should be referred immediately to the Local Authority Designated Officer (LADO) or the Police.

All allegations should be discussed with the Local Authority Designated Officer (LADO) on **the day** the allegation is made known to the school and advice sought from the LADO.

Particular considerations for cases where peer on peer abuse is a factor include:

- What is the nature, extent, and context of the behaviour including verbal, physical, sexting and/or online abuse? Was there coercion, physical aggression, bullying, bribery or attempts to ensure secrecy? What was the duration and frequency? Were other children and /or adults involved?
- What is the child's age, development, capacity to understand and make decisions (including anything that might have had an impact on this i.e. coercion), and family and social circumstances?
- What are the relative chronological and developmental age of the two children and are there any differentials in power or authority?
- Is the behaviour age appropriate or not? Does it involve inappropriate sexual knowledge or motivation?
- Are there any risks to the child themselves and others i.e. other children in school, in the child's household, extended family, peer group, or wider social network?

The school will use resources on such issues to address these matters in PSHE.

Resources on peer-on-peer pressure can be found at:

<http://www.msunderstood.org.uk/assets/templates/msunderstood/style/documents/MSUPB01.pdf>

Organised Abuse

Organised abuse is sexual abuse where there is more than a single abuser and the adults concerned appear to act in concert to abuse children and/or where an adult uses an institutional framework or position of authority to recruit children for sexual abuse.

Female Genital Mutilation

Female Genital Mutilation (FGM) comprises all procedures involving partial or total removal of the external female genitalia or other injury to the female genital organs. It is illegal in the UK and a form of child abuse with long-lasting harmful consequences.

Staff must personally report to the police a disclosure that FGM has been carried out (in addition to liaising with the DSL).

The school will access the following documents if ever the need arises for such information, as referred to in Annex A of KCSIE 2016:

'Multi-Agency Statutory Guidance on Female Genital Mutilation'

'FGM Mandatory Reporting Fact Sheet' and

'FGM - Mandatory Reporting of Female Genital Mutilation – procedural information',

The London Safeguarding Children Board's information on 'Safeguarding Children at Risk of Abuse through Female Genital Mutilation' will also be taken into account:

http://www.londoncp.co.uk/chapters/sg_ch_risk_fgm.html

Radicalisation

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism¹¹. There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. It can happen in many different ways and settings. Specific background factors may contribute to vulnerability, which are often combined with specific influences such as family, friends or online, and with specific needs for which an extremist or terrorist group may appear to provide an answer. The internet and the use of social media in particular has become a major factor in the radicalisation of young people.

As with managing other safeguarding risks, staff should be alert to changes in children's behaviour, which could indicate that they may be in need of help or protection. School staff should use their professional judgement in identifying children who might be at risk of radicalisation and act proportionately which may include making a referral to the Channel programme.

Honour-Based Violence

So-called Honour Based Violence (HBV) is a term used to describe violence committed within the context of the extended family which is motivated by a perceived need to restore standing within the community, which is presumed to have been lost through the behaviour of the victim. Most victims of HBV are women or girls, although men may also be at risk.

Women and girls may lose honour through expressions of autonomy, particularly if this autonomy occurs within the area of sexuality. Men may be targeted either by the family of a woman who they are believed to have 'dishonoured', in which case both parties may be at risk, or by their own family if they are believed to be homosexual.

Some common triggers for HBV include:

- Refusing an arranged marriage
- Having a relationship outside the approved group
- Loss of virginity
- Pregnancy
- Spending time without the supervision of a family member
- Reporting domestic violence

'Honour-based violence' is intended to 'protect or defend family honour' by preventing and punishing a person's violations of family or community 'norms'. A child who is at risk of honour based violence is at significant risk of physical harm (including being murdered) and/or neglect, and may also suffer significant emotional harm through the threat of violence or witnessing violence directed towards a sibling or other family member.

According to the Metropolitan Police Service, an honour-based crime might be committed against someone who:

- becomes involved with a boyfriend or girlfriend from a different culture or religion;
- wants to get out of an arranged marriage;
- wants to get out of a forced marriage;
- Wears clothes or takes part in activities that might not be considered traditional within a particular culture.

The perceived immoral behaviour which could precipitate a murder includes:

- Inappropriate make-up or dress;
- The existence of a boyfriend;
- Kissing or intimacy in a public place;
- Pregnancy outside of marriage;
- Being a victim of rape;
- Inter-faith relationships.

Children sometimes truant from school to obtain relief from being policed at home by relatives. They can feel isolated from their family and social networks and become depressed, which can on some occasions lead to self-harm or suicide.

Families may feel shame long after the incident that brought about dishonour occurred, and therefore the risk of harm to a child can persist. This means that the young person's new boy/girlfriend, baby (if pregnancy caused the family to feel 'shame'), associates or siblings may be at risk of harm.

OTHER SAFEGUARDING ISSUES

Staff need to be aware of the following specific issues. The school holds policies on those marked with an *

Guidance and practical support on these specific safeguarding issues will be sought from expert and professional organisations, if and when needed, using the NSPCC and GOV.UK websites:

- bullying including cyberbullying - see *Appendix 3* for our 'E-Safety Policy'
- domestic violence
- drugs*
- fabricated or induced illness
- faith abuse
- forced marriage
- gangs and youth violence
- gender-based violence/violence against women and girls (VAWG)
- mental health
- hate – see Appendix I of our Anti-Bullying Policy

- private fostering
- sexting – see *Appendix 2* for our ‘Youth-Produced Sexual Imagery Policy’
- teenage relationship abuse
- trafficking

The following has been written using information supplied by The Churches Child Protection Advisory service

RECOGNISING AND RESPONDING TO ABUSE

The following signs may or may not be indications that abuse has taken place, but the possibility should be considered.

Physical Signs of Abuse

- Any injuries not consistent with the explanation given for them.
- Injuries that occur to the body in places that are not normally exposed to falls, rough games, etc.
- Injuries which have not received medical attention
- Neglect – under nourishment, failure to grow, constant hunger, stealing or gorging food, untreated illnesses, inadequate care, etc
- Reluctance to change for, or participate in games or swimming
- Repeated urinary infections or unexplained tummy pains
- Bruises, bites, burns, fractures etc which do not have an accidental explanation
- Cuts/ scratches/ substance abuse

Indicators of Possible Sexual Abuse

- Any allegations made by a child concerning sexual abuse
- Any allegations made by a child concerning female genital mutation
- Child with excessive preoccupation with sexual matters and detailed knowledge of adult sexual behaviour, or who regularly engages in age-inappropriate sexual play
- Sexual activity through words, play or drawing
- Child who is sexually provocative or seductive with adults
- Inappropriate bed-sharing arrangements at home
- Severe sleep disturbances with fears, phobias, vivid dreams or nightmares, sometimes with overt or veiled sexual connotations
- Eating disorders – anorexia, bulimia

Emotional Signs of Abuse

- Changes or regression in mood or behaviour, particularly where a child withdraws or becomes clinging. Also depression/ aggression, extreme anxiety
- Nervousness, frozen watchfulness
- Obsessions or phobias
- Sudden under-achievement or lack of concentration
- Inappropriate relationships with peers and/ or adults
- Attention-seeking behaviour
- Persistent tiredness
- Running away/ stealing/ lying

WHAT TO DO IF YOU SUSPECT THAT ABUSE MAY HAVE OCCURRED

- 1 You must report concerns as soon as possible to Rev. Ida Bolus, the Designated Safeguarding Officer (DSL), who is nominated by the Governors/Trustees to act on their behalf in referring allegations or suspicions of neglect or abuse to the statutory authorities. He/she* may also be required by conditions of the School Insurance Policy to immediately inform the Insurance Company. In the absence of the DSL, the matter should be brought to the attention of Rev. Timothy Bolus (hereafter the “Deputy Co-ordinator”). In all instances telephone 020 8553 7797

If the suspicions in any way involve the DSL or Deputy DSL, then the report should be made to the Safeguarding Governor who should contact the Local Authority Designated Officer (LADO).

- 2 Suspicions will not be discussed with anyone other than those nominated above
- 3 It is, of course, the right of any individual as a citizen to make direct referrals to the child protection agencies or seek advice from a reputable safeguarding agency, although we hope that members of the school will use this procedure. If, however, you feel that the DSL or Deputy DSL have not responded appropriately to your concerns, then it is open to you to contact the relevant organisation direct. We hope that by making this statement that we demonstrate the commitment of the school to effective child protection.

ALLEGATIONS OF PHYSICAL INJURY OR NEGLECT

If a child has a physical injury or symptom of neglect, the DSL will:

- 1 Contact the Local Authority Designated Officer (LADO) for advice in cases of deliberate injury or where concerned about the child’s safety. The school in these circumstances should not inform the parents.
- 2 Where emergency medical attention is necessary it will be sought immediately. The DSL will inform the doctor of any suspicions of abuse.
- 3 In other circumstances speak with the parent/ carer and suggest that medical help/ attention be sought for the child. The doctor (or health visitor) will then initiate further action, if necessary.
- 4 If appropriate, the parent/ carer will be encouraged to seek help from the local Safeguarding Board.
- 5 Where the parent/ carer is unwilling to seek help, if appropriate, the DSL will offer to go with them. If they still fail to act, the DSL should, in cases of real concern, contact the local Safeguarding Board for advice.

ALLEGATIONS OF SEXUAL ABUSE

In the event of allegations or suspicions of sexual abuse, the DSL will:

- 1 Contact the Police Child Protection Team directly. The DSL will NOT speak to the parent (or anyone else).
- 2 If, for any reason, the DSL is unsure whether or not to follow the above, then advice from the Local Authority Designated Officer (LADO) will be sought and followed.

- 3 Under no circumstances will the DSL attempt to carry out any investigation into the allegation or suspicions of sexual abuse. The role of the DSL is to collect and clarify the precise details of the allegation or suspicion and to provide this information to the LADO, whose task it is to investigate the matter under Section 47 of the Children Act 1989.
- 4 Whilst allegations or suspicions of sexual abuse will normally be reported to the DSL, the absence of the DSL or Deputy DSL should not delay referral to the LADO.
- 5 Exceptionally, should there be any disagreement between the person in receipt of the allegation or suspicion and the DSL or Deputy DSL as to the appropriateness of a referral to the LADO, that person retains a responsibility as a member of the public to report serious matters to the LADO, and should do so without hesitation
- 6 The Governors/Trustees will support the DSL or Deputy DSL in their role, and accept that any information they may have in their possession will be shared in a strictly limited way on a need to know basis.

HOW TO RESPOND TO A CHILD WANTING TO TALK ABOUT ABUSE

It is not easy to give precise guidance, but the following may help:

General Points

- Show acceptance of what the child says (however unlikely the story may sound)
- Keep calm
- Look at the child directly
- Be honest
- Tell the child you will need to let someone else know – don't promise confidentiality
- Even when a child has broken a rule, they are not to blame for the abuse
- Be aware that the child may have been threatened or bribed not to tell
- Never push for information. If the child decides not to tell you after all, then accept that and let them know that you are always ready to listen

Helpful things you may say or show

- "I believe you"
- Show acceptance of what the child says
- "Thank you for telling me"
- "It's not your fault"
- "I will help you"

Do not say

- "Why didn't you tell anyone before"
- "I can't believe it!"
- "Are you sure this is true?"
- "Why? How? When? Who? Where?"
- Never make false promises
- Never make statements such as "I am shocked, don't tell anyone else"

Concluding

- Again reassure the child what you are going to do next and that you will let them know what happens (you might have to consider referring to the Children, Schools and Families department or the Police to prevent a child or young person returning home if you consider them to be seriously at risk of further abuse)
- Contact the person in the school responsible for coordinating child protection concerns or contact the Children, Schools and Families department / Police/ NSPCC
- Consider your own feelings and seek pastoral support if needed

WHAT TO DO ONCE A CHILD HAS TALKED TO YOU ABOUT ABUSE

The Procedure

- Make notes as soon as possible (preferably within one hour of the child talking to you), writing down exactly what the child said and when she/he said it, what you said in reply and what was happening immediately beforehand (e.g. a description of the activity). Record dates and times of these events and when you made the record. Keep all hand written notes, even if subsequently typed. Such records should be kept safely for an indefinite period.
Use the form "Responding to abuse – worker's action sheet"
- Report your discussion as soon as possible to the DSL. If the latter is implicated report to the Deputy DSL. If all are implicated, report to the Safeguarding Governor, who should contact the Local Authority Designated Officer (LADO).
- You should not discuss your suspicions or allegations with anyone other than those nominated in the above point.
- Once a child has talked about abuse the DSL should consider whether or not it is safe for a child to return home to a potentially abusive situation. On rare occasions, it might be necessary to take immediate action to contact the LADO and/ or Police to discuss putting into effect safety measures for the child so that they do not return home.

WORKING WITH OFFENDERS

The Governors/Trustees in their commitment to the protection of all children will meet with the individual and discuss boundaries that the person will be expected to keep.

Offenders will be expected to sign a contract stipulating boundaries and will involve the person's family and partner who will need to be informed.

HELPING VICTIMS OF ABUSE

As a Christian school, we are committed to supporting victims of abuse, and encouraging them in their faith.

The school will ensure the child's wishes or feelings are taken into account when determining what action to take and what services to provide to protect individual children through ensuring there are systems in place for children to express their views and give feedback. Staff members should not promise confidentiality to the child and always act in the interests of the child.

ARRANGEMENTS FOR SUPERVISION OF GROUP/ CHILDREN'S ACTIVITIES

Practical Issues

- A register of children or young people attending the activity should be kept, and a register of helpers.
- A log of each activity, recording any unusual events with each teacher/assistant recording what they witnessed should be kept.
- Incidents such as fights and what action the teacher/assistant took should be recorded in the logbook.
- Accidents and injuries should be recorded in a separate accident book and parents and older children should be asked to sign this.
- No person under 16 years of age should be left in charge of any children of any age. Nor should children or young people attending school be left alone at any time.

Boundaries

- All staff members should treat all children/young people with dignity and respect in attitude, language used and actions.
- Respect the privacy of children, avoid questionable activity.
- If you invite a child to your home, ensure this is with the knowledge of the Principal and that a parent is aware.
- Ensure that all transport arrangements have parental approval and are with the knowledge of the leadership.
- Only staff members assigned to a group should be allowed into rooms. Other adults should not have free access. Ensure you note anybody else who is there for a specific reason in the logbook.

OFF-SITE VISITS/

Appropriate risk assessments must be in place prior to any off-site visit taking place.

Any overnight visit will explicitly set out sleeping arrangements; the role and responsibility of each adult, whether employed or volunteers; on/off duty arrangements; clear expectations about boundaries and interactions with children/young people; and expectations around smoking/drinking by adult.

Safeguarding concerns or allegations will be responded to following the school safe-guarding procedures. The member of staff in charge of the visit will report any safeguarding concerns to the Designated Safeguarding Lead and Head teacher/Principal,* who will pass to the Local Authority Designated Officer (LADO) if appropriate. In an emergency, the staff member in charge will contact the police and/or social care.

POLICY ON SUSPICIONS OR ALLEGATIONS OF CHILD ABUSE INVOLVING SCHOOL STAFF

Staff must be aware that they may be vulnerable to accusations of abuse and must, therefore, be sensitive to a child's reaction to physical contact and react appropriately. During their daily contact with the children, all staff must be aware of the following:

- It is the policy of London Christian Learning Centre not to kiss the pupils.
- Staff should not touch a child in such a way or on parts of the body that might be considered indecent.
- Staff should avoid restraining children, except under certain circumstances when it is unavoidable (See Policy on Restraint).
- Staff should maintain professional standards of behaviour and appropriate boundaries at all times in relationships between themselves and the pupils, themselves and the parents.
- A member of staff, who feels that they may be at risk of being accused of behaving inappropriately, should request the presence of another member of staff.
- No form of corporal punishment should ever be used nor its use ever threatened.
- When it is necessary to restrain a child to prevent injury to themselves, others or property, only the minimum force should be used and injury to the child concerned should be avoided. Any arm or hands should never be placed around a child's neck.

If there is an allegation or suspicion of misconduct about a member of staff, the Principal/Head Teacher* must be informed immediately. Failure to do so may result in disciplinary action

If the allegation or suspicion in any way involves the DSL or Deputy DSL, then the report should be made to the Safeguarding Governor, 020 8553 7797 who should contact the Local Authority Designated Officer (LADO) on 020 3373 3803 or email nick.pratt@newham.gov.uk and give as much information as you can.

The school is required to inform the Disclosure and Barring Service as soon as investigations are completed, any person, whether employed, contracted, a volunteer, or a student, whose services are no longer used because he or she is considered unsuitable to work with children.

The address for referrals is DBS customer services, PO Box 3961, Royal Wootton Bassett SN4 4HF - Telephone 03000 200 190. Failure by the school to make such a report could constitute an offence, leading to the school being removed from the DfE's register of Independent Schools (legislation from The Education (Provision of Information by Independent Schools) (England) Regulations 2003. Compromise Agreements cannot apply in this connection.

The school will also make a referral to the Disclosure and Barring Service (DBS) if a person in regulated activity has been dismissed or removed due to safeguarding concerns, or would have been had they not resigned. This is a legal duty of the school.

NCTL will also be informed added if staff are sacked due to safeguarding issues
<https://teacherservices.education.gov.uk/>

Regard must be given to the section 'Allegations of Abuse Made Against Teachers and Other Staff', in the document "Keeping Children Safe in Education' (2016)', which is on file in the school office.

ALLEGATIONS AGAINST PUPILS

The School's policies on behaviour, bullying, discipline and sanctions should be read in conjunction with this policy and will also apply to this situation. Bullying should be treated as a child protection concern when there is reasonable cause to suspect that a child is suffering or likely to suffer significant harm. A pupil against whom an allegation of abuse has been made may be suspended from the School during the investigation if it is considered to be in the interests of a child who might otherwise be at risk, in the interests of the pupils at large or to allow the investigation to proceed more effectively.

POLICY ON RESPONSIBILITIES AND ACTIONS TO BE TAKEN IF THE WHEREABOUTS OF A CHILD IS UNKNOWN/ CHILDREN MISSING FROM EDUCATION

In the case of a child being withdrawn from the school and their whereabouts being unknown, the school will endeavour in the first place to make contact with the parents or guardians.

If no communication is received within a week, the school will contact the LEA to enquire whether they have any information regarding the child. If the LEA do not have any facts about the whereabouts of the child we will consult with the LEA about the next step which may involve handing the case over to the local Children's Services.

If this is the case, a note will be made in the Admissions Register stating that the child's whereabouts is unknown and that they have been referred to the LEA. This will be updated if any relevant information is received.

POLICY FOR CHILDREN LOOKED AFTER

The school recognises that children looked after/ children in care are one of the most vulnerable groups of children so need more frequent observational assessment to meet their needs. All staff will be made aware of anyone in the school who is looked after so that the child can be supported adequately. On admission, it will be established who has parental responsibility so that statutory requirements are met.

PHOTOGRAPHY AND IMAGES

To protect children we will:

- Seek parental consent for photographs to be taken or published (for example, on our website or in newspapers or publications)
- Only use school equipment
- Only take photos and videos of children to celebrate achievement
- Use only the child's first name with an image
- Ensure that children are appropriately dressed
- Encourage children to tell us if they are worried about any photographs that are taken of them.

The school will issue a statement that where parents are taking photographs of children related to school events these are to be for personal use only (these are not to be shared on social media for example).

SAFER RECRUITMENT POLICY

APPOINTMENT OF WORKERS

In appointing workers, the following criteria will need to be met:

- 1 All prospective workers will be asked to complete an application form.
- 2 The procedure for the appointment will be:
 - * Completion of application form
 - * An interview to make sure any past issues are resolved.
 - * Undertaking all necessary checks as detailed below
 - * Discussing with the applicant in detail the school's policy on safeguarding children's welfare and expectations in relation to practice issues e.g. supervision of children's activities and workers etc.
 - * Attaching the new appointee to a more experienced worker for a period of time
 - * During and at the end of this probationary period, receiving feedback from other workers on the progress of the trainee
 - * Only then confirming the appointment – perhaps with regular reviews and support where there are particular concerns.
3. The school will verify a candidate's identity, preferably from current photographic ID and proof of address except where, for exceptional reasons, none is available
4. Enhanced DBS checks will be undertaken for all staff, including volunteers who are carrying out relevant, unsupervised activities with the students, and all Governors/Trustees.
5. Those in regulated activity will need an enhanced DBS certificate with barred list check
See point 24
6. A separate barred list check (List 99 check) will be obtained if an individual will start work in regulated activity before the DBS certificate is available
7. A Prohibition from Teaching Check must be completed for *everyone* engaged in 'teaching work', whether a qualified teacher or not; and recorded on the Single Central Record, to ensure they are not prohibited from teaching, using **Teacher Services** (<https://www.gov.uk/guidance/teacher-status-checks-information-for-employers>).
Teacher Services can be used to find out if potential new staff have any current prohibitions, restrictions or sanctions using the following lists:
 - teachers who have failed to successfully complete their induction or probation period
 - teachers who are the subject of a suspension or conditional order imposed by the General Teaching Council for England (prior to its abolition)
 - teachers and others who are prohibited from teaching in England
 - individuals who have been barred from taking part in the management of an Independent school (including academies and free schools)
 - teachers sanctioned (since 18 January 2016) in other EEA member states by an EEA member state regulator of the teaching professionEven people with QTS, MUST have this prohibition check entered into the Single Central Record.
8. All leaders and managers, including Trustees/Governors are now required to have a **section 128 Management Check** – This will be included on the school's SCR showing

that checks have been according to section 128. This will also be done using Teacher Services (as point 7).

9. In the case of a foreign national, the appropriate overseas body from their country will be contacted for a criminal record check or police clearance. Where this proves unobtainable the Embassy of that country will be contacted to request information on any criminal records that person has. If this proves ineffectual then at least two character references will be taken from citizens residing in that country who know the person well, but this should be a final resort. They must declare if they know of any criminal records held, their relationship with the applicant and their professional capacity, if any. All steps taken must be well documented.
10. Ideally, all foreign nationals should obtain a criminal record check or police clearance before applying for a position with the school.
11. The applicant's right to work in the UK will be checked and evidence kept on record.
12. As part of our Safe Guarding Policy employment will not be offered without the applicant supplying evidence of a full employment history, including information on any gaps
13. Applicants will also be asked to supply a declaration of their mental and physical fitness, concerning their suitability to the position applied for. A job applicant can be asked relevant questions about disability and health in order to establish whether they have the physical and mental capacity for the specific role
14. Two references will be requested, for all staff, including volunteers, which go back 5 years, and include a professional, character and pastoral reference (where relevant).
15. Professional qualifications, will be verified, as appropriate
16. The criteria for NOT appointing children's workers are:
 - * Previous offences against children
 - * If the Governors/Trustees have reservations about an individual's behaviour, lifestyle, attitudes and spiritual commitment.
 - * If the Governors/Trustees have any reasons to doubt a worker's suitability for the job.
17. Workers will be given a contract on appointment
18. All new staff will be expected to read the school Code of Conduct Policy and all policies concerning Child Protection and Safeguarding as part of their Induction Process.
19. All new staff will need to complete a Basic Awareness Course on Safeguarding and Child Protection, renewable every two years *Please note: *There is no national guidance on the timescale for refresher training for staff, so you need to decide the best timescale for yourselves; with the exception of the DSL training, which is at two-yearly intervals. Safer Recruitment training no longer has a refresher timescale.*
20. The school will keep this information on all staff members as to whether or not the following checks have been carried out or certificates obtained, and the date on which the checks were completed, in a single central record.
21. The appointment of workers will be reviewed on a regular basis at an annual meeting using Staff Assessment forms.

22. Staff are to be informed at interview that the school may review the DBS automatic updates yearly, with prior consent from staff, or ask for a signed declaration regarding any convictions, cautions, reprimands or a warnings which have been recorded on a police central record, (includes 'spent' and 'unspent' convictions) or if any information is held locally by police forces that are grounds to be considered relevant, since their last declaration. This includes any information that may be held on the DBS's children and adults barred list.
23. Teachers/assistants will be given opportunities to meet together with the Principal to discuss work programmes and areas of concern including issues relating to discipline
24. If an applicant's criminal record check reveals details of past cautions and/or convictions the following procedures will be followed:
 - If the certificate simply confirms what the applicant has already disclosed and we have already taken this information into account when making the offer of employment, we will confirm the offer of employment.
 - If our decision to recruit an applicant depends upon approval from a senior staff member, we shall ensure that the decision maker has all the relevant information to hand in order to make a fair and balanced decision. This may include the applicant's initial disclosure, a disclosure statement and any other relevant information they may have provided in the interim that may inform a risk assessment.
 - If the certificate reveals information that we were not expecting or that the applicant had not previously disclosed, further consideration may be necessary. *See Appendix 5.*

EXTERNAL VISITORS/CONTRIBUTORS/SPEAKERS

Visitors with a professional role, such as the school nurse, social worker, educational psychologist or members of the Police will have had the appropriate vetting checks undertaken by their own organisation. Any professionals visiting the school should provide evidence of their professional role and employment details (an identity badge for example). If felt necessary, the school will contact the relevant organisation to verify the individual's identity.

The school has a separate policy for visiting speakers.

AGENCY STAFF

The school will check that any agency staff member attending the school is the same person that the agency has provided the vetting checks for.

This policy is written in line with our:

- Preventing Extremism and Radicalisation Policy
- Whistleblowing Policy
- E-Safety Policy
- Behaviour Policy
- Anti-bullying Policy
- Missing Children Policy
- Staff Code of Conduct Policy

These are all available on request from the school office.

RENEWAL OF DBS CHECKS

Information taken from: (<https://www.teachers.org.uk/sites/default/files2014/ecr31-dbs-checks.doc>).

Since there has never been a requirement for a rolling programme of three-yearly checks for staff who have unbroken service, DBS checks will only be renewed if there has been a break of three months or more. However, a return to work after a period of statutory leave (e.g. maternity, adoption, parental leave, sabbatical, or sickness), is not a new appointment, nor a break in service, as long as the employment remains continuous, therefore a DBS check is not required by law.

The only reference to three-year checks in *Safeguarding Children and Safer Recruitment in Education* (the DfE's statutory guidance prior to *'Keeping Children Safe in Education....'*) was at Appendix 11, where it was **recommended** for agency staff only. Such routine checks for staff directly employed by the school are not required and are considered to be excessive, as they go beyond what the law requires or the Government recommends.

If a new staff member has previously been DBS checked, there is no statutory requirement that another DBS check is carried out *before* taking up a job in our school, provided they

have continuous service and the check is at the correct level for the new post, other than a check of the Barred Lists.

In this case the school will carry out a risk assessment to assess whether the check is at the correct level for the current role, whether it is accurate and whether they trust the previous organisation to have carried out the check efficiently.

The school will ask for evidence from the previous school, college, local authority or supply agency, that the check was undertaken.

However, the school will ensure that an enhanced DBS check is undertaken as soon as possible for the school Single Central Records, or use the update service if the employee is subscribed to this service.

Also the school may review the automatic updates yearly, with prior consent from staff, or ask for a signed declaration regarding any convictions, cautions, reprimands or a warnings which have been recorded on a police central record, (includes 'spent' and 'unspent' convictions) or if any information is held locally by police forces that are grounds to be considered relevant, since their last declaration. This includes any information that may be held on the DBS's children and adults barred list. Staff will be made aware of this at interview.

SAFETY MATTERS

The school's arrangements to fulfil other safeguarding and welfare responsibilities are as follows:

Ensure high standards of provision and care for children and learners

Actively promote equality and diversity

Tackle bullying and discrimination immediately

Actively promote British values

Prevent radicalisation and extremism

Ensure that all persons know how to complain and understand the process for doing so

Ensure that children and learners are protected and feel safe.

Challenge any discriminatory behaviour and give help and support to children about how to treat others with respect

Consistently promote positive behaviour

Ensure that all children and learners can identify a trusted adult with whom they can communicate about any concerns, and know that these adults will listen to them and take their concerns seriously

Ensure that written records are made in a timely way and held securely where adults working with children or learners are concerned about their safety or welfare. Those records will be shared appropriately and, where necessary, with consent.

Make clear risk assessments

Oversee the safe use of technology by ensuring that our policies and procedures are adhered to

Use an Acceptable Use Agreement

Carefully select and vet staff and volunteers working with children and learners according to statutory requirements.

Check all staff using Enhanced DBS checks

Ensure that all staff have regular Child Protection and Safeguarding Training

Ensure that the Designated Safeguarding Leads undertake training at two-yearly intervals, and in addition receive an update at least yearly

Ensure that the Designated Safeguarding Leads have a job description, and clear cover arrangements. DSLs will be drawn from the senior leadership team and will be the persons

carrying out the day-to-day work of safeguarding and child protection. Their responsibilities will not be delegated to others. See *Appendix 1*.

Keep the Single Central Record up to date

Regularly review safeguarding policies and procedures to keep all children and learners safe

Policy Adopted by Governors/Trustees on: March 2018

Policy Last Reviewed on: March 2018

Policy Due for Review on: March 2019

ROLE AND RESPONSIBILITIES OF THE SCHOOL DESIGNATED SAFEGUARDING LEAD

The School Designated Safeguarding Lead (DSL) is the first point of contact for any member of the school staff who has a concern about the safety and well-being of a student.

The DSL does not need to be a member of the teaching staff but should be a recognised member of the Senior Management Team with the required status and authority to carry out the requirements of the role.

Depending on the size and requirements of the school a Deputy Designated Safeguarding Lead should be available. The deputy is the first point of contact in the absence of the DSL to avoid any unnecessary delays in responding to a student's needs.

The DSL and Deputy DSL are required to undertake child protection training every two years and should supplement this training by attending workshops where available, at least annually.

Requirements:

- To have the skills and ability to identify signs of abuse.
- To know how to refer concerns to the appropriate investigating agencies.
- Maintain detailed and accurate written records of child protection concerns and ensure they are kept securely.
- Offer support, advice and give a level of expertise to all members of the school staff team.
- Ensure that all staff have access to and understand the school Safeguarding and Child Protection Policy and Procedures.
- To be able to provide basic awareness/child protection training as part of the induction for all new staff in the school and be part of any other relevant training.
- Be responsible with the Principal/Head Teacher for the annual review and update of the School Safeguarding Policy and the presentation of this to the Governing Body.
- Ensure that a copy of the School Safeguarding and Child Protection Policy is available for any parents who request to see it.
- Ensure that the Principal/Head Teacher and Chair of Governors/Trustees are updated on a regular basis about all issues and child protection investigations.
- Ensure that relevant safeguarding files are copied and forwarded appropriately when a child/young person transfers to another school.
- Be part of the team who review and monitor any causes of concern relating to students which are raised in school

YOUTH-PRODUCED SEXUAL IMAGERY POLICY

Also known as 'Sexting'

This policy is linked to the school's Safeguarding and Child Protection policies.

INTRODUCTION

Youth-produced sexual imagery is imagery that is being created by under 18s themselves and involves 'sexual imaging', still photographs, 'sexting', video, and streaming. Sexual content is different to indecent - indecent is subjective and has no specific definition in UK law. 'Sexual imaging' is one of a number of 'risk-taking' behaviours associated with the use of digital devices, social media or the internet. It is accepted that young people experiment and challenge boundaries and therefore the risks associated with 'online' activity can never be completely eliminated. However, Name of School takes a pro-active approach in its ICT and Enrichment programmes to help students to understand, assess, manage and avoid the risks associated with 'online activity'. The school recognises its duty of care to its young people who do find themselves involved in such activity as well as its responsibility to report such behaviours where legal or safeguarding boundaries are crossed.

There are a number of definitions of 'sexual imaging' and 'sexting' but for the purposes of this policy sexual imaging is simply defined as images or videos generated by children under the age of 18, or of children under the age of 18 that are of a sexual nature or are indecent.

These images are shared between young people and/or adults via a mobile phone, handheld device, computer, 'tablet' or website with people they may not even know.

There are many different types of sexual imaging (see Supplement 2) and it is likely that no two cases will be the same. It is necessary to carefully consider each case on its own merit. However, it is important that Name of School applies a consistent approach when dealing with an incident to help protect young people and the school, and the response should always be guided by the 'principle of proportionality'. The primary concern at all times should be the welfare and protection of the young people involved. For this reason the Designated Safeguarding Lead (or Headteacher in the absence of the DSL) needs to be informed of any 'sexual imaging' incidents. The range of contributory factors in each case also needs to be considered in order to determine an appropriate and proportionate response. All colleagues are expected to be aware of this policy.

The decisions made by the Designated Safeguarding Lead will be guided by a pathway found at: [http://www.msrb.org.uk/pdf/Annex%201-Sexual imaging%20FEB13%20\(2\).pdf](http://www.msrb.org.uk/pdf/Annex%201-Sexual%20imaging%20FEB13%20(2).pdf)

THE LAW

Making, possessing, and distributing any imagery of someone under 18 which is indecent is illegal. This includes imagery of taken by someone of themselves if they are under 18.

Indecent is not definitively defined in law, but images are likely to be considered indecent if they depict:

- a naked young person
- a topless girl
- an image which displays genitals, and
- sex acts including masturbation.

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- indecent images may also include overtly sexual images of young people in their underwear

These laws weren't created to criminalise young people but to protect them. Although sharing sexual images of themselves is illegal and risky, it is often the result of curiosity and exploration. Young people need education, support, and safeguarding, not criminalisation.

The National Police Chiefs' Council (NPCC) is clear that "youth-produced sexual imagery should be primarily treated as a safeguarding issue."

Schools may respond to incidents without involving the police. (However, in some circumstances, the police must always be involved.) Images may be deleted and incident managed in school by using a risk-based approach.

STEPS TO TAKE IN THE CASE OF AN INCIDENT

STEP 1 - DISCLOSURE BY A STUDENT

Sexual imaging disclosures should follow the normal safeguarding practices and protocols (see Safeguarding Policy).

A student is likely to be very distressed especially if the image has been circulated widely and if they don't know who has shared it, seen it or where it has ended up. They will need pastoral support during the disclosure and after the event. They may even need immediate protection or a referral to police or social services; parents should be informed as soon as possible (police advice permitting).

The following questions will help decide upon the best course of action:

- Is the student disclosing about themselves receiving an image, sending an image or sharing an image?
- What sort of image is it? Is it potentially illegal or is it inappropriate?
- Are the school child protection and safeguarding policies and practices being followed?
- For this reason a member of the Safeguarding team should be involved as soon as possible.
- How widely has the image been shared and is the device in their possession?
- Is it a school device or a personal device?
- Does the student need immediate support and/or protection?
- Are there other students and/or young people involved?
- Do they know where the image has ended up?

Assessing the risks once the images have been shared

- Has it been shared with the knowledge of the young person?
- Are adults involved in the sharing?
- Was there pressure to make the image?
- What is the impact on those involved?
- Does the child or children have additional vulnerabilities?
- Has the child taken part in producing sexual imagery before?

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STEP 2 - SEARCHING A DEVICE – WHAT ARE THE RULES?

Please refer to the school's Search and Confiscation Policy which is based on the most current legislation: The 2011 Education Act.

The policy allows for a device to be examined, confiscated and securely stored if there is reason to believe it contains indecent images or extreme pornography. When searching a mobile device the following conditions should apply:

- The action is in accordance with the school's policies regarding Safeguarding and Searching and Confiscation.
- The search is conducted either by the head teacher or a person authorised by them (or Deputy Head or Designated Safeguarding Lead) and one other person
- A member of the safeguarding team should normally be present
- The search should normally be conducted by a member of the same gender as the person being searched. However if the image being searched for is likely to be of a different gender to the person 'in possession' then the device should only be viewed by a member of the same gender as the person whose image it is.

If any illegal images of a young person are found the Safeguarding Team will discuss this with the Police (see Appendices 1, 2 and 3).

The Association of Chief Police Officers (ACPO) advise that as a general rule it will almost always be proportionate to refer any incident involving 'aggravated' sharing of images to the Police, whereas purely 'experimental' conduct may proportionately dealt with without such referral, most particularly if it involves the young person sharing images of themselves.

'Experimental conduct' commonly refers to that shared between two individuals (e.g. girlfriend and boyfriend) with no intention to publish the images further (see Supplement 2). Coercion is not a feature of such conduct, neither are requests for images sent from one person to multiple other young persons.

Any conduct involving, or possibly involving, the knowledge or participation of adults should always be referred to the police.

If an 'experimental' incident is not referred to the Police, the reasons for this should be recorded in the school's 'Safeguarding Incidents Log'.

Always put the young person first. Do not search the device if this will cause additional stress to the student/person whose image has been distributed. Instead rely on the description by the young person, secure the advice and contact the Police.

Never:

- Search a mobile device even in response to an allegation or disclosure if this is likely to cause additional stress to the student/young person UNLESS there is clear evidence to suggest not to do so would impede a police inquiry.
- View the image unless it is unavoidable. Instead, respond to what you have been told the image contains.
- Copy, print or share any material for evidence (it is illegal)
- Move any material from one storage device to another
- Discuss with parents, unless there is an issue where that's not possible

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Always:

- Refer to the Designated Safeguarding Lead, who is able to take any necessary strategic decisions.
- If it is felt necessary to view the image, discuss with the Headteacher/Principal or DSL first, and view with another member of staff present
- Record the fact that the images were viewed along with reasons and who was present. Sign and date.
- Record the incident. The Safeguarding Team employ a systematic approach to the recording of all safeguarding issues
- Act in accordance with school safeguarding search and confiscation policies and procedures
- Contact social care or the police if there is any concern that the young person is at risk of harm

If there is an indecent image of a child on a website or a social networking site then the Safeguarding Team will report the image to the site hosting it. Under normal circumstances the team would follow the reporting procedures on the respective website; however, in the case of a sexual imaging incident involving a child or young person where it may be felt that they may be at risk of abuse then the team will report the incident directly to CEOP:

www.ceop.police.uk/ceop-report, so that law enforcement can make an assessment, expedite the case with the relevant provider and ensure that appropriate action is taken to safeguard the child.

Once the DSL has enough information, the decision should be made whether to deal with the matter in school or refer it to the police/social care. All information and decision-making should be recorded in line with school policy. If the incident has been dealt with in school, a further review should be held to assess risks.

The DSL should always refer to the police or social care if incident involves:

- an adult
- coercion, blackmail, or grooming
- concerns about capacity to consent, [e.g., SEN]
- images show atypical sexual behaviour for the child's developmental stage
- violent acts are depicted
- image shows sex acts and includes a child under 13
- a young person at risk of immediate harm as a result of the disclosure (for example, self-harm or suicide)

STEP 3 - WHAT TO DO AND NOT DO WITH THE IMAGE

If the image has been shared across a personal mobile device:

Always

- Confiscate and secure the device(s). Close down or switch the device off as soon as possible. This may prevent anyone removing evidence 'remotely'.

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Never

- View the image unless there is a clear reason to do so or view it without an additional adult present (this additional person does not need to view the image and certainly should not do so if they are of a different gender to the person whose image has been shared). The viewing of an image should only be done to establish that there has been an incident which requires further action.
- Send, share or save the image anywhere (**this is illegal**)
- Allow students to do any of the above

If the image has been shared across a school network, a website or a social network:

Always

- Block the network to all users and isolate the image

Never

- Send or print the image
- Move the material from one place to another
- View the image outside of the protocols in the school's safeguarding and child protection policies and procedures.

Deleting images (from devices and social media)

If the school decides that involving other agencies is not necessary, consideration should be given to deleting the images.

It is recommended that pupils are asked to delete the images themselves and confirm they have done so. This should be recorded, signed, and dated.

Any refusal to delete the images should be treated seriously, reminding the pupil that possession is unlawful.

STEP 4 - WHO SHOULD DEAL WITH THE INCIDENT?

Often, the first port of call for a student is a class teacher. Regardless of who the initial disclosure is made to she/he must act in accordance with the school safeguarding and/or child protection policy, ensuring that a member of the Safeguarding Team and a senior member of staff are involved in dealing with the incident.

The Designated Safeguarding Lead should always record the incident. The Headteacher should also always be informed- usually by the DSL. There may be instances where the image needs to be viewed and this should be done in accordance with protocols and only if unavoidable.

STEP 5 - DECIDING ON A RESPONSE

There may be many reasons why a student has engaged in sexual imaging – it may be a romantic/sexual exploration scenario or it may be due to coercion.

It is important to remember that it won't always be appropriate to inform the police; this will depend on the nature of the incident (see Supplement 1 for definitions). However, as a school it is important that incidents are consistently recorded. It may also be necessary to assist the young person in removing the image from a website or elsewhere.

If indecent images of a young person are found:

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- Act in accordance with the Safeguarding policy i.e. inform the Safeguarding Team
- Store the device securely
- The Safeguarding Team should carry out a risk assessment in relation to the young person (Use Appendices 2 and 3 for support)
- The Safeguarding Team will make a referral if needed
- The Safeguarding Team will contact the police (if appropriate). Referrals may be made to Social Care but where a crime may be thought to have taken place the police are the first port of call. Young persons who have engaged in 'experimental sexual imaging' which is contained between two persons will be referred to Social Care for support and guidance. Those who are felt to be victims of 'sexual imaging' will also be referred to Social Care at a point where the police feel that this will not impede an investigation.
- The young person's Supervisor will put the necessary safeguards in place for the student, e.g. they may need counselling support or immediate protection.
- Inform parents and/or carers about the incident and how it is being managed.

STEP 6 - CONTAINMENT AND PREVENTION

The young persons involved in 'sexual imaging' may be left feeling sensitive and vulnerable for some time. They will require monitoring by and support from their Guidance/Pastoral teams.

Where cases of 'sexual imaging' become widespread or there is thought to be the possibility of contagion then the school will reinforce the need for safer 'online' behaviour using a variety of resources (see [http://www.mscb.org.uk/pdf/Annex%201-Sexual imaging%20FEB13%20\(2\).pdf](http://www.mscb.org.uk/pdf/Annex%201-Sexual%20imaging%20FEB13%20(2).pdf)).

Other staff may need to be informed of incidents and should be prepared to act if the issue is continued or referred to by other students. The school, its students and parents should be on high alert, challenging behaviour and ensuring that the victim is well cared for and protected.

The students' parents should usually be told what has happened so that they can keep a watchful eye over the young person especially when they are online at home.

STEP 7 - REVIEW OUTCOMES AND PROCEDURES WITH THE AIM OF PREVENTING FUTURE INCIDENTS

The frequency or severity of such incidents may be such that the school will need to review its approach. Where this is the case Name of School will do the following:

- ensure that key policies e.g. Safeguarding, Anti- Bullying, Authorised User Policies are still relevant and can meet emerging issues.
- ensure that the school's infrastructure and technologies are robust enough to meet new challenges.
- ensure that both adults and young persons are alerted to the issues such as safety mechanisms, support mechanisms and the legal implications of such behaviour.
- use the Ofsted framework for Behaviour and Safety as a benchmark to test the strength of the school's approach.

Sexual imaging incidents relate to self-generated images on personally-owned devices, generally outside of school. Name of School will adopt preventative education strategies for its young people and put in place appropriate staff training to identify and manage incidents. The following are resources currently available:

- CEOP resources at www.thinkuknow.co.uk. There is a film called Exposed and accompanying lesson plans for 11-16 year olds.

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- The children's charity Childnet www.childnet-int.org have developed a drama for secondary school-aged children on the issue of sexual imaging.
- Teachtoday is a source of advice for teachers on a variety of topics and does include information on the issue of sexual imaging www.teachtoday.eu.
- The Southwest Grid for Learning have developed a resource for young people: 'So you got naked online' [www.swgfl.org.uk/sexual imaginghelp](http://www.swgfl.org.uk/sexual%20imaginghelp) which supports them in knowing what to do if things have gone wrong online

YOUTH-PRODUCED SEXUAL IMAGERY POLICY - SUPPLEMENT 1

THE LEGAL POSITION

It is important to be aware that young people involved in sharing sexual videos and pictures may be committing a criminal offence. Specifically, crimes involving indecent photographs (including pseudo images) of a person under 18 years of age fall under Section 1 of the Protection of Children Act 1978 and Section 160 Criminal Justice Act 1988. Under this legislation it is a crime to:

- take an indecent photograph or allow an indecent photograph to be taken;
- make an indecent photograph (this includes downloading or opening an image that has been sent via email);
- distribute or show such an image;
- possess with the intention of distributing images;
- advertise; and
- possess such images

While any decision to charge individuals for such offences is a matter for the Crown Prosecution Service, it is unlikely to be considered in the public interest to prosecute children. However, children need to be aware that they may be breaking the law. Although unlikely to be prosecuted, children and young people who send or possess images may be visited by police and on some occasions media equipment could be removed. This is more likely if they have distributed images.

The decision to criminalise children and young people for sending these kinds of images is a little unclear and may depend on local strategies. However, the current Association of Chief Police Officers (ACPO) position is that: *'ACPO does not support the prosecution or criminalisation of children for taking indecent images of themselves and sharing them. Being prosecuted through the criminal justice system is likely to be upsetting and distressing for children especially if they are convicted and punished. The label of sex offender that would be applied to a child or young person convicted of such offences is regrettable, unjust and clearly detrimental to their future health and wellbeing.'*

However, there are cases in which children and young people have been convicted and sent to prison. The important thing to remember is that whilst, as a school, we will want to consider the implications of reporting an incident over to the police, it is not our responsibility to make decisions about the seriousness of the matter; that responsibility lies with the Police and the CPS hence the requirement for the school to refer.

In summary sexual imaging is classed as illegal as it constitutes sharing and/or possessing an indecent image of a child.

YOUTH-PRODUCED SEXUAL IMAGERY POLICY - SUPPLEMENT 2

DIFFERENT LEVELS OF SEXUAL IMAGING

The following is adapted from Wolak and Finkelhor '*Sexual imaging: a Typology*'. March 2011

Aggravated incidents involving criminal or abusive elements beyond the creation, sending or possession of youth-produced sexual images

- **Adult offenders** develop relationships with and seduce underage teenagers, in criminal sex offences even without the added element of youth-produced images. Victims may be family friends, relatives, community members or contacted via the Internet. The youth produced sexual images generally, but not always, are solicited by the adult offenders.
- **Youth Only: Intent to Harm** cases that:
 - arise from interpersonal conflict such as break-ups and fights among friends
 - involve criminal or abusive conduct such as blackmail, threats or deception
 - involve criminal sexual abuse or exploitation by juvenile offenders.
- **Youth Only: Reckless Misuse** no intent to harm but images are taken or sent without the knowing or willing participation of the young person who is pictured. In these cases, pictures are taken or sent thoughtlessly or recklessly and a victim may have been harmed as a result, but the culpability appears somewhat less than in the malicious episodes.

Experimental incidents involve the creation and sending of youth-produced sexual images, with no adult involvement, no apparent intent to harm or reckless misuse.

- **Romantic episodes** in which young people in ongoing relationships make images for themselves or each other, and images were not intended to be distributed beyond the pair.
- **Sexual Attention Seeking** in which images are made and sent between or among young people who were not known to be romantic partners, or where one youngster takes pictures and sends them to many others or posts them online, presumably to draw sexual attention.
- **Other:** cases that do not appear to have aggravating elements, like adult involvement, malicious motives or reckless misuse, but also do not fit into the Romantic or Attention Seeking sub-types. These involve either young people who take pictures of themselves for themselves (no evidence of any sending or sharing or intent to do so) or pre-adolescent children (age 9 or younger) who did not appear to have sexual motives.

