

Safeguarding policy and procedures



Approved by:	Governing Body
Last reviewed on:	March 2025
Reviewed by:	Head Teacher
Next review due by:	January 2026

1. Aims	6
2. Legislation and Statutory Guidance	6
3. Key Personnel and Contacts	7
4. Definitions	10
5. Equality statement	11
6. Roles and responsibilities	12
6.1 All Cornfields School Staff, Supply Staff and Volunteers	12
6.2 The designated safeguarding lead (DSL)	14
6.3 The Advisory Board	15
6.4 The Headteacher	16
6.5 Virtual School Heads	17
7 Confidentiality	16
8 Recognising abuse and taking action	17
8.1 If a child is suffering or likely to suffer harm, or in immediate danger	18
8.2 If a child makes a disclosure to you	19
8.3 If you discover that FGM has taken place, or a child is at risk of FGM	19
8.4 Concerns about a child who is not in immediate danger or is suffering or likely to suffer significant harm	20
8.4.1 Early help assessment	21
8.4.2 Referrals	21
8.5 If you have concerns about extremism	22
8.6 If you have a mental health concern	23
8.7 Concerns about a staff member, supply teacher, volunteer, or contractor	23
8.8 Allegations of abuse made against other students	23
8.8.1 Procedures for dealing with allegations of child-on-child abuse	24
8.8.2 Routes following a report of sexual violence and/or sexual harassment	25
8.8.3 Risk Assessment	27
8.8.4 Ongoing Support	27
8.8.5 Creating a supportive environment in school and minimising the risk of child-on-child abuse	28
8.9 Sharing of nudes and semi-nudes ('sexting')	30
8.9.1 Your responsibilities when responding to an incident	31
8.9.2 Initial review meeting	31
8.9.3 Further review by the DSL	32
8.9.4 Informing parents/carers	32
8.9.5 Referring to the police	33

8.9.6	Recording incidents	33
8.9.7	Curriculum coverage	33
8.9.8	Support	33
8.9.9	Reporting systems for our students	34
9	Online safety and the use of mobile technology (including smartwatches)	35
10	Notifying parents or carers	36
11	Students with special educational needs, disabilities, or health issues	37
12	Children who are lesbian, gay, bi, or trans (LGBT+)	37
13	Students with a social worker	38
14	Looked-after and previously looked-after children	38
15	Complaints and concerns about school safeguarding policies	37
15.1	Complaints against staff	38
15.2	Other complaints	38
15.3	Whistleblowing	39
16	Record keeping	39
17	Training	40
17.1	All staff	40
17.2	The DSL and DDSLs	41
17.3	Governors	41
17.4	Support for staff	42
18	Monitoring and review	42
19	Links with other policies and procedures	42
	Appendix 1: types of abuse	42
	Appendix 2: safer recruitment and DBS checks – policy and procedures	44
	Recruitment and selection process	44
	Pre-appointment vetting checks	46
	Appendix 3: allegations of abuse made against staff	49
	Allegations against staff (including low-level concerns)	49
	Suspension of the accused until the case is resolved	49
	Definitions for outcomes of allegation investigations	50
	Procedure for dealing with allegations	50
	Additional considerations for supply teachers and all contracted staff	52
	Specific actions	53
	Confidentiality and information sharing	54

Record-keeping	54
References	54
Learning Lessons	55
Non-recent allegations	55
Section 2: concerns that do not meet the harm threshold (Low-Level Concerns)	55
Definition of low-level concerns	56
Low Level Concerns Data protection and Confidentiality	56
Reporting and sharing low-level concerns	57
Self-referral	57
Responding to low-level concerns	58
What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Code of Conduct and the law?	59
What action will be taken if it is determined that the behaviour constitutes a low-level concern?	59
What action will be taken if it is determined that the behaviour merits contact with the LADO or referral to other external agencies?	60
Record keeping	60
References	61
Spectrum Of Behaviour Chart	61
Appendix 4: specific safeguarding issues	61
Children who are absent from education	61
Child criminal exploitation	62
Child sexual exploitation	63
Child-on-child abuse	64
Domestic abuse	65
Homelessness	65
So-called 'honour-based' abuse (inc FGM and forced marriage)	65
Forced Marriage	67
Preventing radicalisation	67
Sexual violence and sexual harassment between children in schools	69
Serious violence	70
Checking the identity and suitability of visitors	71
Non-collection of children and Missing Students	71
Elective home education (EHE)	71

Mental Health	72
Online safety	72
Private Fostering	72
Remote Education	72
School related weapons incidents	73

1 Aims

Cornfields School aims to ensure that:

- Appropriate action is taken in a timely manner to safeguard and promote children's welfare.
- We are committed to providing our children with a sense of belonging and an environment that is welcoming, safe, valuable, and respectful
- All staff are aware of their statutory responsibilities with respect to safeguarding.
- Staff are professionally trained in recognising and reporting safeguarding issues.

The welfare of our children is paramount. All children, regardless of age, gender, culture, language, race, ability, sexual identity, or religion have equal rights to protection, safeguarding and opportunities.

2. Legislation and Statutory Guidance

This policy is based on the Department for Education's (DfE's) statutory guidance [Keeping children safe in education 2024](#) and [Working together to safeguard children 2023](#). Cornfields School also follows the laws and statutory guidance below:

This policy is also based on the following legislation and guidance:

- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of students at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B (11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'Regulated activity' is in relation to children.
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- [The Human Rights Act 1998](#), which explains that being subjected to harassment, violence and/or abuse, including that of a sexual nature, may breach any or all of the rights which apply to individuals under the [European Convention on Human Rights \(ECHR\)](#)
- [The Equality Act 2010](#), which makes it unlawful to discriminate against people regarding particular protected characteristics (including disability, sex, sexual orientation, gender reassignment and race). This means our governors and headteacher should carefully consider how they are supporting their children regarding these characteristics. The

Act allows our school to take positive action to deal with disadvantages affecting students (where we can show it's proportionated). This includes making reasonable adjustments for disabled students. For example, it could include taking positive action to support girls where there's evidence that they're being disproportionately subjected to sexual violence or harassment.

- [The Public Sector Equality Duty](#) (PSED), which explains that we must have due regard to eliminating unlawful discrimination, harassment and victimisation. The PSED helps us to focus on key issues of concern and how to improve students' outcomes. Some students may be more at risk of harm from issues such as sexual violence; homophobic, biphobia or transphobic bullying; or racial discrimination.

Adherence to the School's Child Safeguarding policy is mandatory for all staff, supply staff and volunteers and its use is not subject to discretion. Everybody in the school must, therefore, be aware and understand their safeguarding responsibilities, child protection issues, and the procedures set out in this document.

This document is reviewed annually by the DSL and by the Advisory Board. **The next scheduled date for reviews is August 2025.**

3. Key Personnel and Contacts

An effective whole school child protection policy is one which provides clear direction to staff and others about expected codes of behaviour in dealing with child protection issues. An effective policy also makes explicit the school's commitment to the development of good practice and sound procedures. This ensures that child protection concerns and referrals may be handled sensitively, professionally and in ways which prioritise the needs of the child.

The Designated Safeguarding Lead:

Ms N Douglas

Email: n.douglas@cornfields.kent.sch.uk

Head Teacher

Mr T Thompson

Email: t.thompson@cornfields.kent.sch.uk

The nominated Local Governing Body member with oversight of safeguarding issues

Dr Sarah Sherwood

Email: s.sherwood@cornfields.kent.sch.uk

Chair of Advisory Board

Mr Ian Mullins

Email: i.mullins@cornfields.kent.sch.uk

Local Authority Safeguarding Boards

Kent County Council (MASH)

Kent Front Door – 03000 411 111 (daytime)

Email social.services@kent.gov.uk. Text relay 1800103000411111

If you need to contact outside of normal hours for example during the night call 03000419191

Medway County Council (MASH)

Telephone 01634 334 466 daytime hours (Monday to Friday 9am to 5pm)

Telephone 03000419191 emergency out of hours

As the students on roll draw from other boroughs, below is a list of those Safeguarding Boards.

East Sussex (MASH)

Telephone: 01323464222 Single Point of Advice (SPOA)

If you feel that a child or teenager is not in immediate danger but are still worried you can also email 0-19spoa@east.sussex.gov.uk. Monday to Thursday 8.30am to 5pm. Friday 08.30 am to 4.30pm.

Out of hours: For a serious concern about a child that cannot wait until the next day, contact the Emergency Duty Service.

Weekdays from 5pm to 08:30 am. Also weekends and bank holidays. Telephone 01273 335906 or 01273 335905

Lewisham (MASH)

Telephone: 020 8314 6660

Email: MashAgency@lewisham.gov.uk

Surrey (C-SPA)

Telephone: 0300 470 9100

Email: cspa@surreycc.gov.uk

LADO Service (Local Authority Designated Officer) Kent

Direct Line: 03000 410 888

Email: KentChildrensLado@kent.gov.uk

LADO Service (Local Authority Designated Officer) Medway

Direct Line: 01634 331065

Available 9am -5pm Monday to Friday.

Lucy Grieg- Local Authority Designated Officer

Direct Line: 01634 331 954

Email: Child.protection@medway.gov.uk

Lucy.grieg@medway.gov.uk

The LADO provides advice and presides over the investigation of any allegation or suspicion of abuse directed against anyone working in the school.

The Education Welfare Service at Kent

Can support with general advice and guidance to independent schools however, their involvement with individual students is limited to statutory processes which are: prosecution for persistent absence, CME investigations (where the whereabouts of the child is unknown despite school contacts, and they have been absent for 6 days or longer) and Elected Home Education. ews@achievingforchildren.org.uk

However, if you are seriously concerned about a child's immediate safety, always dial 999. Full local procedures on what to do if you have a concern are available at: These needs completing.

Child Sexual Exploitation (CSE) Kent Police

If you suspect a person of carrying out child sexual exploitation or think someone has been a victim or may be soon- call 101

If someone is in immediate danger and need support right now call 999

To report a crime online www.kent.police.uk

AfC Substance Misuse Service

Referrals should be sent to: smsreferrals@achievingforchildren.org.uk

AfC Contextual Safeguarding Team

Contact for if we become aware of locations outside of school which we consider to be safeguarding hotspots contextualsafeguarding.exploitation@achievingforchildren.org.uk even if these have been already passed to the Police.

The **Cyber Choices** programme seeks to intervene and educate people who may be vulnerable to becoming involved in cyber dependant criminality or have first come to notice for committing offences under the Computer Misuse Act.

There is a referral programme where if a person, parent, teacher has concerns about a specific individual they can refer them to the Cyber Choices team. Within Kent, this should be done by completing a form at this address:

The following links provide information about safeguarding:

- www.ceop.police.uk Child Exploitation and Online Protection – Free advice for victims of online abuse or you are worried about somebody else.
- www.childline.org.uk - Childline is the free helpline for children and young people in the UK. Children and young people can call 0800 1111 to talk about any problem.
- www.education.gov.uk - Department for Education
- www.nspcc.org.uk - The NSPCC (National Society for the Prevention of Cruelty to Children) is the UK's leading charity specialising in child protection and the prevention of cruelty to children.
- www.barnardos.org.uk - Helps the most vulnerable children and young people transform their lives and fulfil their potential.
- Kent Family Hubs- call 0300 04 1111

This policy should be considered alongside other related policies in school. These are:

1. Anti-Bullying Policy (includes Cyberbullying and Child-on-child)
2. Prevent and Upholding British Values Policy
3. Special Educational Needs and Disabilities Policy
4. Health and Safety Policy
5. Equal Opportunities Policy
6. Student Behaviour Policy
7. Whistle-blowing Policy.
8. Safer Recruitment Policy
9. Acceptable Use of ICT Policy (includes taking and storing images)
10. Educational Visits Policy
11. Online Safety Policy
12. Staff Code of Conduct
13. Mental Health Procedures
14. Looked after child Policy.
15. Suicide Procedure
16. Children missing education Policy.

4. Definitions

Safeguarding means the process for protecting children from harm and abuse, whether that is within or outside the home, as well as online.

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care.
- Taking action to enable all children to have the best outcomes
- providing help and support to meet the needs of children as soon as problems emerge

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

Abuse is where somebody fails to prevent harm (neglect) or causes harm (abuse). It can take place anywhere, including online and outside of the home. Harm can include witnessing ill treatment of others, for example seeing, hearing, or experiencing the effects of domestic abuse. We are aware that safeguarding issues are rarely standalone events and cannot be covered by one definition or one label alone. In most cases, multiple issues will overlap. Our staff will be aware that technology is a significant part of many safeguarding issues.

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

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

Children include everyone under the age of 18.

The following 3 **safeguarding partners** are identified in Keeping Children Safe in Education 2024 (and defined in the Children Act 2004, as amended by Chapter 2 of the Children and Social Work Act 2017). They will decide to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

- The chief officer of police for an area falling within the local authority (police)
- The local authority (LA)
- The Integrated Care Board for an area within the local authority (health)

Partners work together to identify the safeguarding needs of the local area and come up with a joint response to address them.

Victim is a widely understood and recognised term, but we understand that not everyone who has been subjected to abuse considers themselves a victim or would want to be described that way. When managing an incident, we will be prepared to use any term that the child involved feels most comfortable with. One possible alternate phrasing that staff may prefer to use is 'individual/s impacted by...'

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

Staff refers to all those working for or on behalf of Cornfields School full-time, part-time, and regular visiting staff, in a paid or voluntary capacity.

Parent refers to birth parents and other adults who are in a parenting role, for example stepparents, foster carers and adoptive parents.

5. Equality statement

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

We give special consideration to children who:

- Have special educational needs and/or disabilities (SEND) or health conditions (see section 10)
- Are young carers.
- May experiences discrimination due to their race, ethnicity, religion, gender identification or sexuality.
- Have English as an additional language.

- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence.
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation.
- Are asylum seekers?
- Are at risk due to either their own or a family member's mental health needs.
- Are looked after or previously looked after (see section 12)
- Are missing or absent from education for prolonged periods and/or repeat occasions.
- Whose parent/carer has expressed an intention to remove them from school to be home educated.

6. Roles and responsibilities

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

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

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

6.1 All Cornfields School Staff, Supply Staff and Volunteers

All Cornfields School Staff, Supply Staff and Volunteers will:

- Read and understand part 1 and annex B of the Department for Education's statutory safeguarding guidance, Keeping Children Safe in Education, and review this guidance at least annually.
- Sign a declaration at the beginning of each academic year to say that they have reviewed the guidance.

- Participate in the organised training in child protection on appointment and be updated at frequent intervals (for example, via email, e-bulletins, and staff meetings)
- Reinforce the importance of online safety when communicating with parents and carers. This includes making parents and carers aware of what we ask children to do online (e.g. sites they need to visit or who they will be interacting with online)
- create a culture where children who identify as lesbian, gay, bisexual, transgender (LGBT) or are gender questioning feel safe, can speak out and share concerns.

All Cornfields School Staff, Supply Staff and Volunteers will be aware of:

- Our systems which support safeguarding, including this child protection and safeguarding policy, the staff code of conduct, the role and identity of the designated safeguarding lead (DSL) and deputy, the behaviour policy, online safety policy and the safeguarding response to children who go missing from education.
- The early help assessment process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment.
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play.
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child-on-child abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM, radicalisation and serious violence (including that linked to county lines)
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe, including taking into consideration their wishes regarding actions.
- The Cornfields School Staff Code of Conduct, which provides guidance to staff to ensure that their behaviour and actions do not place students or themselves at risk of allegations of harm to students. This is issued to all staff at the start of their contract.
- The fact that children can be at risk of harm inside and outside their home, at school and online.
- The fact that children who are (or who are perceived to be) lesbian, gay, bi or trans. (LGBTQ+) can be targeted by other children.
- What to look for to identify children who need help or protection

We recognise that children cannot be expected to raise concerns in an environment where staff fail to do so. If any member of staff is dissatisfied with the way that a DSL has dealt with his or her concern over the welfare of a student, he or she may contact the Head and/or the nominated Governor (Dr Sarah Sherwood) with oversight for safeguarding issues.

Volunteer and supply staff are made aware of all matters relating to safeguarding. Every adult with responsibility for the care and welfare of children at Cornfields School is appropriately checked and vetted under the criteria of Safeguarding Children and Safer Recruitment.

Induction and training on safeguarding is provided for all full-time, part-time, and volunteer staff as part of the annual programme of INSET and bespoke sessions. This training will always include online safety within its content.

Section 16 and appendix 4 of this policy outline in more detail how staff are supported to do their role.

6.2 The designated safeguarding lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is Nicole Douglas. The DSL takes lead responsibility for child protection and wider safeguarding in the school. This includes suspected abuse, neglect, exploitation, and online safety.

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

When the DSL is absent, the deputy DSLs will ensure the ongoing safety and protection of all students.

The DSL can be contacted via face-to-face conversation, or can be contacted via email n.douglas@cornfields.kent.sch.uk

If the DSL is not available, the following deputies can be contacted via face to face or email.

- Raluka Savu – r.savu@cornfields.kent.sch.uk

The DSL will be given the time, funding, training, resources, and support to carry out the role effectively:

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

The DSL will also:

- Keep the headteacher informed of any issues.
- Liaise with local authority case managers and designated officers for child protection concerns as appropriate.

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

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

6.3 The Advisory Board

An advisory board member of senior board level takes leadership responsibility for the school's safeguarding arrangements (known as the safeguarding link governor).

The advisory board will:

- Facilitate a whole-school approach to safeguarding, ensuring that safeguarding and child protection are at the forefront of, and underpin, all relevant aspects of process and policy development.
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the headteacher to account for its implementation.
- Participate in appropriate safeguarding and child protection (including online) training at induction. This should be regularly updated (at least every three years)
- Ensure that at least one member of the Governing Board has completed safer recruitment training to be repeated every five years.
- Be aware of its obligations under the Human Rights Act 1998, the Equality Act 2010 (including the Public Sector Equality Duty), and our school's local multi-agency safeguarding arrangements.
- Appoint a link governor to monitor the effectiveness of this policy in conjunction with the full advisory board. This is always a different person from the DSL.
- Ensure all staff undergo safeguarding and child protection training, including online safety, and that such training is regularly updated and is in line with advice from the safeguarding partners.
- Ensure that the school has appropriate filtering and monitoring systems in place and review their effectiveness. This includes:
 - Making sure that the leadership team and staff are aware of the provisions in place, and that they understand their expectations, roles and responsibilities around filtering and monitoring as part of safeguarding training
 - Reviewing the DfE's filtering and monitoring standards, and discussing with IT staff and service providers what needs to be done to support the school in meeting these standards

Make sure:

The DSL has the appropriate status and authority to carry out their job, including additional time, funding, training, resources and support.

- Online safety is a running and interrelated theme within the whole-school approach to safeguarding and related policies.
- The DSL has lead authority for safeguarding, including online safety, understanding the filtering, and monitoring systems and processes in place.
- The school has procedures to manage any safeguarding concerns (no matter how small) or allegations that do not meet the harm threshold (low-level concerns) about staff members (including supply staff, volunteers, and contractors). Appendix 3 of this policy covers this procedure.
- That this policy reflects that child with SEND, or certain medical or physical health conditions, can face additional barriers to any abuse or neglect being recognised.

Where another body is providing services or activities (regardless of whether the children who attend these services/activities are children on the school roll or not):

- Seek assurance that the other body has appropriate safeguarding and child protection policies/procedures in place and inspect them if needed.
- Make sure there are arrangements for the body to liaise with the school about safeguarding arrangements, where appropriate
- Make sure that safeguarding requirements are a condition of using the school premises, and that any agreement to use the premises would be terminated if the other body fails to comply.

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

All advisory board members will read Keeping Children Safe in Education in its entirety.

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

6.4 The Head teacher

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

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

- Ensuring Cornfields School staff feel able to raise concerns about poor or unsafe practice and that such concerns are handled sensitively and in accordance with the whistle-blowing procedures.
- Reporting to the Disclosure and Barring Service within one month of leaving the school any person (whether employed, contracted, a volunteer or student) whose services are no longer used because they are considered unsuitable to work with children. Failure to do so constitutes an offence and may result in the school being removed from the DfE register of independent schools.
- Ensuring that 'settlement agreements' are never agreed in connection with Safeguarding Policy issues.
- Liaising and informing DBS, Ofsted and/or DfE of incidents as appropriate.
- Ensuring that safe recruitment practices are followed by checking the suitability of staff and others working with our children. All employees have enhanced DBS checks and Prohibition Checks
- Working in liaison with the school business manager, who is responsible for maintaining and updating the School's Single Central Record relating to Safer Recruitment and appointments.

6.5 Virtual School Heads

Virtual school heads have a non-statutory responsibility for the strategic oversight of the educational attendance, attainment, and progress of a child with a social worker.

They should also identify and engage with key professionals, e.g. DSLs, special educational needs co-ordinators (SENCOs), social workers, mental health leads and others.

7 Confidentiality

For full details on Cornfields School's approach to confidentiality and data protection, please see the separate privacy notice policies.

In relation to safeguarding, please note:

- Timely information sharing is essential to effective safeguarding.
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare and protect the safety of children.
- The safeguarding team may on occasions need to share information without consent where there is good reason to do so, and that the sharing of information would enhance the safeguarding of a child in a timely manner.
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe.
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests.

- If a victim asks the school not to tell anyone about the sexual violence or sexual harassment:
 - There is no definitive answer, because even if a victim does not consent to sharing information, staff may still lawfully share it if there's another legal basis under the UK. GDPR that applies.
 - The DSL will have to balance the victim's wishes against their duty to protect the victim and other children
- The DSL should consider that:
 - Parents or carers should normally be informed (unless this would put the victim at greater risk)
 - The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care.
 - Rape, assault by penetration and sexual assault are crimes. Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police. While the age of criminal responsibility is 10, if the alleged perpetrator is under 10, the starting principle of referring to the police remains.
- Regarding anonymity, all staff will:
 - Be aware of anonymity, witness support and the criminal process in general where an allegation of sexual violence or sexual harassment is progressing through the criminal justice system.
 - Do all they can to protect the anonymity of any children involved in any report of sexual violence or sexual harassment, for example, carefully considering which staff should know about the report, and any support for children involved.
 - Consider the potential impact of social media in facilitating the spreading of rumours and exposing victims' identities.
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information

Staff are aware they can look at the [data-protection-in-schools](#) toolkit or speak to a member of the safeguarding team if they are unsure about sharing information.

Confidentiality is also addressed in this policy with respect to record-keeping in section 5.2.

8. Recognising abuse and acting

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

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

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

Call the police on **999** if a child is in immediate danger. **Anyone** can make a referral to children's services if a child is suffering or likely to suffer significant harm. Usually, the DSL or deputy makes the

Referral. If you make a direct referral, update the DSL or deputy (see section 5.2) as soon as possible.

Contact details for relevant agencies are at the start of this policy. You may also wish to look at the information from GOV.UK via this link: <https://www.gov.uk/report-child-abuse-to-local-council>

If, within the context of these guidelines, a child has injuries which require immediate treatment, the DSL/Head should arrange for the child to be taken to the casualty department of the nearest hospital.

They should inform the hospital that child abuse is suspected. The DSL/Head must also arrange for the parents, or those with parental responsibility, to be informed as soon as possible that the child has been taken to hospital.

8.2 If a child makes a disclosure to you.

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

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

Bear in mind that some children may:

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

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

8.3 If a child has experienced or is at risk of female genital mutilation

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

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

Indicators that a child has already been subjected to FGM, and factors that suggest a student may be at risk, are set out in appendix 4 of this policy.

Any teacher who either:

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

Must immediately report this to the police, personally. This is a mandatory statutory duty, and teachers will face disciplinary sanctions for failing to meet it.

Unless they have been specifically told not to disclose, they should also discuss the case with the DSL and involve children's social care as appropriate.

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

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

All staff should speak to the DSL (or a deputy) when a concern about female genital mutilation (FGM) arises. If a teacher suspects that FGM has been carried out on a child or believes that the child is at risk of FGM, they will follow their internal safeguarding procedures.

8.4 Concerns about a child who is not in immediate danger or is suffering or likely to suffer significant harm.

Figure 1 below, illustrates the procedure to follow if you have any concerns about a child's welfare.

If you have any concerns about a child and you need to decide what action to take. Where possible, first speak to the DSL to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 800 5000. Share details of any actions you take with the DSL as soon as possible.

Make a referral to local authority children's social care directly, if appropriate (see 'Referral' below). Share any action taken with the DSL as soon as possible.

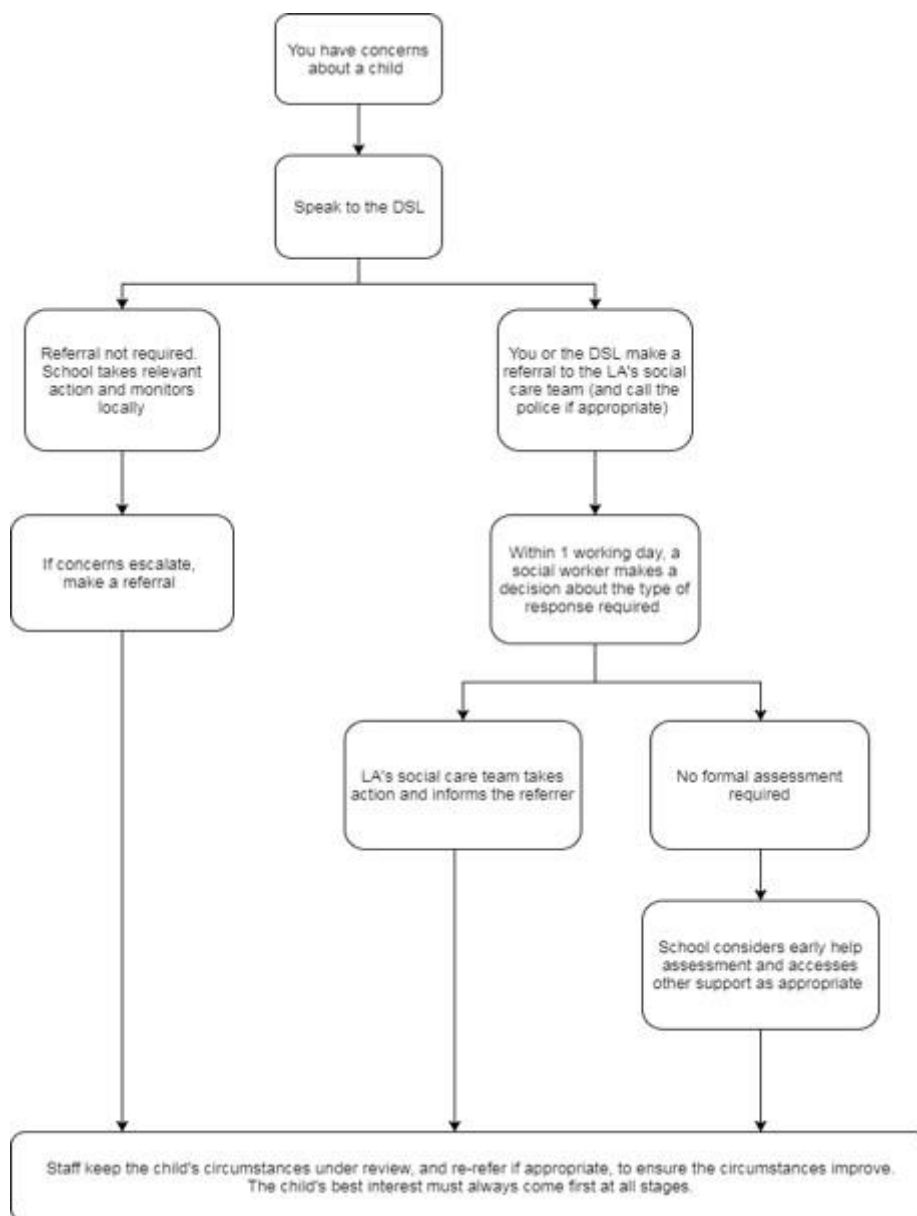


Figure 1: procedure if you have concerns about a child's welfare (as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) Note – if the DSL is unavailable, this should not delay action.

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

School staff should ensure the child's wishes and feelings are considered when determining what action to take and what services to provide.

8.4.1 Early help assessment

Early help is support for children of all ages that improves a family's resilience and outcomes or reduces the chance of a problem getting worse. At Cornfields School, we are keen to provide support to families as soon as a problem becomes visible. If an early help assessment is appropriate, the DSL will lead on liaising with other agencies and setting up an inter-agency

assessment as appropriate. Staff may be required to support other agencies and professionals in an early help assessment, in some cases acting as the lead practitioner.

We will discuss and agree, with statutory safeguarding partners, levels for the different types of assessment, as part of local arrangements.

The DSL will keep the case under constant review and the school will consider a referral to local authority children's social care if the situation does not seem to be improving. Timelines of interventions will be monitored and reviewed.

Advice and guidance on any Safeguarding Children Partnerships early help assessments can be found via email.

ehsupport@medway.gov.uk - Medway

webspoa@eastsussex.gov.uk – Contact single point of advice team - East Sussex

8.4.2 Referrals

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

If you make a referral directly (see section 7.1), you must tell the DSL as soon as possible.

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

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

8.5 If you have concerns about extremism.

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

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

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

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

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

- Think someone is in immediate danger.
- Think someone may be planning to travel to join an extremist group.
- See or hear something that may be terrorist related.

For further details on Extremism, see the **Prevent and Upholding British Values Policy**.

8.6 If you have a mental health concern.

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

Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.

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

8.7 Concerns about a staff member, supply teacher, volunteer, or contractor

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

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

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

If you receive an allegation relating to an incident where an individual or organisation was using the school premises for running an activity for children, follow our school safeguarding policies and procedures, informing the LADO, as you would with any safeguarding allegation.

8.8 Allegations of abuse made against other students.

We recognise that children are capable of abusing other children. The starting point regarding any report should always be that there is a zero-tolerance approach to sexual violence and sexual harassment, and it is never acceptable, and it will not be tolerated. Abuse will never be tolerated

or passed off as “banter,” “just having a laugh” or “part of growing up,” as this can lead to a culture of unacceptable behaviours and an unsafe environment for students.

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

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

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

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

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

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

- You must record the allegation and tell the DSL, but do not investigate it.
- Ensure that all victims are reassured that they are being taken seriously and that they will be supported throughout the process and kept safe.
- The DSL will contact the local authority children's social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence.
- The DSL will put a risk assessment and support plan into place for all children involved (including the victim(s), the child(ren) against whom the allegation has been made and any others affected) with a named person they can talk to if needed. This will include considering school transport as a potentially vulnerable place for a victim or alleged perpetrator(s)
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate
- Ensure that the victim understands what the next steps will be and who the report will be passed to
- While the facts are being established, the alleged instigator is removed from any classes shared with the victim and kept a reasonable distance apart in the best interests of both children.
- Careful consideration is given to when to inform the alleged instigator, and this is discussed with relevant agencies.
- See also section 7.2 for dealing with all disclosures, in this document.

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

decisions to be made. Decisions would be made on a case-by-case basis, in consultation with the DSL, the Head and our local Safeguarding Partnership. Some situations are statutorily clear: a child under the age of 13 can never consent to sexual activity, the age of consent is 16; sexual intercourse without consent is rape (as defined in law); creating or sharing sexual images or videos of under 18s is illegal, including children making or sharing these themselves.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. The experience may adversely affect their educational attainment. Sexual violence and sexual harassment exist on a continuum and may overlap; they can occur online and offline (both physically and verbally) and are never acceptable. It is important that all victims are taken seriously and offered appropriate support.

Reports of sexual violence and sexual harassment are extremely complex to manage. It is essential that victims are protected, offered appropriate support, reassured that they are being taken seriously and that every effort is made to ensure their education is not disrupted.

A victim should never be given the impression that they are creating a problem by reporting sexual violence or sexual harassment. Nor should a victim ever be made to feel ashamed for making a report or their experience minimised. It is also important that other students and school staff are supported and protected as appropriate.

Whilst any report of sexual violence or sexual harassment should be taken seriously, staff should be aware it is more likely that girls will be the victims of sexual violence and sexual harassment, and more likely boys will perpetrate it.

The school may decide that the children involved do not require statutory interventions but may benefit from early help. An assessment as described above will be carried out and submitted to the relevant agency in such cases.

Ultimately, any decisions are for the school to make on a case-by-case basis, with the designated safeguarding lead (or a deputy) taking a leading role and using their professional judgement, supported by other agencies, such as children's social care and the police as required. Decisions and actions are regularly reviewed, and relevant policies are updated to reflect lessons learnt.

8.8.2 Routes following a report of sexual violence and/or sexual harassment.

There are four likely routes to consider after a report of sexual violence or sexual harassment. In deciding which route to take, we would consider:

- the wishes of the victim in terms of how they want to proceed.
- the nature of the alleged incident
- the ages of the children involved.
- the developmental stages of the children involved.
- any power imbalance between the children
- whether the incident a one-off or a sustained pattern of abuse
- any ongoing risks to the victim, other children, school, or college staff
- contextual safeguarding issues

1. **Managing internally:** In some cases of sexual harassment (such as one-off incidents) the school may manage the incident internally.
2. **Early help:** This is particularly useful in addressing non-violent, harmful sexual behaviour and may prevent escalation.
3. **Referrals to children's social care:** In cases where there has been harm, or there is an immediate risk, a referral should be made to children's social care.
4. **Reporting to the police (in parallel to children's social care):** In cases where rape, assault by penetration or sexual assault is reported. Schools should not wait for the outcome of a police investigation before protecting the victim, instigator, and other children in the school. The DSL should work closely with the police to ensure that the school's actions do not jeopardise the police investigation. If a child is convicted or cautioned, the school should update the risk assessment and consider suitable action through their behaviour policy.

Where neither children's social services nor the police accept the complaint, a thorough school investigation should take place into the matter using the school's usual disciplinary procedures.

Where no further action is taken, or a child found not guilty, the school should continue to support the victim and instigator.

It is important for the school to ensure the victim and instigator remain protected, especially from bullying or harassment. Staff need to be aware of the harm also caused by bullying and should use the school's anti-bullying procedures where necessary. However, on occasions a student's behaviour may warrant a response under Child Protection, rather than anti-bullying procedures.

The management of children and young people with sexually harmful behaviour is complex and the Head and DSL will work with other relevant agencies to maintain the safety of the whole school community. Young people who display such behaviour may be victims of abuse themselves, and the Child Protection procedures will be followed for both victim and instigator.

Parents, of both the student being complained about and the alleged victim, should be informed and kept updated on the progress of the referral.

If a report is determined to be unsubstantiated, unfounded, false, or malicious.

The DSL should consider whether the child and/or the person who has made the allegation is in need of help or may have been abused by someone else and this is a cry for help. In such circumstances, a referral to children's social care may be appropriate.

If a report is shown to be deliberately invented or malicious

The school should consider whether a sanction is appropriate against the individual who made it as per the behaviour policy.

If a child who has experienced sexual assault asks the school not to make a referral

If the child/young person does not give consent to share information, staff may still lawfully share it, if there is another legal basis under the UK GDPR that applies.

The basic safeguarding principle is: if a child is at risk of harm, is in immediate danger, or has been harmed, a referral should be made to local authority children's social care, and rape, assault by penetration and sexual assaults are crimes.

Where a report of rape, assault by penetration or sexual assault is made, this should be referred to the police.

Whilst the age of criminal responsibility is ten, if the alleged instigator is under ten, the starting principle of referring to the police remains. The police will take a welfare, rather than a criminal justice approach, in these cases.

The DSL (or a deputy) will have to balance the victim's wishes against their duty to protect the victim and other children.

8.8.3 Risk Assessment

When there has been a report of sexual violence, the designated safeguarding lead (or a deputy) should make an immediate risk and needs assessment. Where there has been a report of sexual harassment, the need for a risk assessment should be considered on a case-by-case basis.

The risk and needs assessment should consider:

- the victim, especially their protection and support
- whether there may have been other victims
- the alleged instigator(s)
- all the other children, (and, if appropriate, adult students and staff) at the school
- especially any actions that are appropriate to protect them from the alleged instigator (s), or from future harms.

The risk assessments will be recorded (electronic) and will be kept under review.

It is likely that professional risk assessments by social workers and or sexual violence specialists will be required. The above school risk assessment is not intended to replace the detailed assessments of expert professionals. Any such professional assessments should be used to inform the school's approach to supporting and protecting their students and updating their own risk assessment.

The DSL will make a record of the concern, the discussion and any outcome and keep a copy in the files of both student's files.

8.8.4 Ongoing Support

- Wherever possible, the victim if they wish, should be able to continue in their normal routine. Overall, the priority should be to make the victim's daily experience as normal as possible, so that the school is a safe space for them.
- The victim should never be made to feel they are the problem for making a report or made to feel ashamed for making a report.

- Support should be tailored on a case-by-case basis. The support required regarding a one-off incident of sexualised name-calling is likely to be vastly different from that for a report of rape.
- Be aware that sexual assault can result in a range of health needs, including physical, mental, and sexual health problems and unwanted pregnancy. Children and young people that have a health need arising from sexual assault or abuse can access specialist NHS support from a Sexual Assault Referral Centre (SARC).
- Access support from Children and Young People's Independent Sexual Violence Advisors (ChISVAs) provide emotional and practical support for victims of sexual violence.
- Access support from Child and adolescent mental health services (CAMHS)
- Access support from Rape Crisis (England & Wales) or The Survivors Trust for details of local specialist organisations. The Male Survivors Partnership can provide details of services which specialise in supporting men and boys.
- It is essential that dialogue is kept open and encouraged. When it is clear that ongoing support will be required, the school should ask the victim if they would find it helpful to have a designated trusted adult (for example, their form tutor or designated safeguarding lead) to talk to about their needs.
- Be aware that a victim of sexual violence is likely to be traumatised and, in some cases, may struggle in a normal classroom environment. Avoid any action that would have the effect of isolating the victim, in particular, from supportive peer groups, there may be times when the victim finds it difficult to maintain a full-time timetable and may express a wish to withdraw from lessons and activities. Provide space for victims to withdraw.
- Consider and maintain arrangements to potentially protect and support the victim for a long time.
- The school will ensure that the DSL knows how and where to seek support if they need it.
- If a victim requests a move to another school this request should be considered and supported (and following discussion with their parents/carers and caseworker - if relevant)
- If a move to another educational institution happens for any reason, the new educational institution will be made aware of any ongoing support needs. The DSL should take responsibility to ensure this happens.

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

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

To achieve this, we will:

- Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images.
- Be vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female students, and initiation or hazing type violence with respect to boys.
- Ensure our curriculum helps to educate students about appropriate behaviour and consent.
- Ensure students are able to easily and confidently report abuse using our reporting systems (as described in section 7.10 below)

- Ensure staff reassure victims that they are being taken seriously.
- Be alert to reports of sexual violence and/or harassment that may point to environmental or systemic problems that could be addressed by updating policies, processes, and the curriculum, or could reflect wider issues in the local area that should be shared with safeguarding partners.
- Support children who have witnessed sexual violence, especially rape or assault by penetration. We will do all we can to make sure the victim, alleged perpetrator(s) and any witnesses are not bullied or harassed.
- Consider intra-familial harms and any necessary support for siblings following a report of sexual violence and/or harassment.
- Ensure staff are trained to understand:
 - How to recognise the indicators and signs of child-on-child abuse, and know how to identify it and respond to reports
 - That even if there are no reports of child-on-child abuse in school, it does not mean it is not happening – staff should maintain an attitude of “it could happen here”
 - That if they have any concerns about a child’s welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report.

For example:

- Children can show signs or act in ways they hope adults will notice and react to
 - A friend may make a report
 - A member of staff may overhear a conversation
 - A child’s behaviour might indicate that something is wrong
- That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity, and/or sexual orientation
- That a student harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy
- The important role they have to play in preventing child-on-child abuse and responding where they believe a child may be at risk from it
- That they should speak to the DSL if they have any concerns
- That social media is likely to play a role in the fall-out from any incident or alleged incident, including for potential contact between the victim, alleged perpetrator(s), and friends from either side

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

Disciplinary action can be taken while other investigations are going on, e.g. by the police. The fact that another body is investigating or has investigated an incident does not (in itself) prevent our school from coming to its own conclusion about what happened and imposing a penalty accordingly.

We will consider these matters on a case-by-case basis, considering whether:

- Acting would prejudice an investigation and/or subsequent prosecution – we will liaise with the police and/or local authority children’s social care to determine this.
- There are circumstances that make it unreasonable or irrational for us to reach our own view about what happened while an independent investigation is ongoing.

8.9 Sharing of nudes and semi-nudes ('sexting')

8.9.1 Your responsibilities when responding to an incident.

Producing and sharing nudes and semi-nudes of under 18s is illegal. If you are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), you must report it to the DSL immediately.

The types of incidents which this advice covers are:

- a person under the age of 18 creates and shares nudes and semi-nudes of themselves with a peer under the age of 18.
- a person under the age of 18 shares nudes and semi-nudes created by another person under the age of 18 with a peer under the age of 18.
- a person under the age of 18 is in possession of nudes and semi-nudes created by another person under the age of 18.

This advice does not cover:

- the sharing of nudes and semi-nudes of under 18s by adults (18 and over) as this constitutes child sexual abuse and education settings should always inform their local police force as a matter of urgency.
- children and young people under the age of 18 sharing adult pornography or exchanging sexual texts which do not contain images.

You must not:

- View, copy, print, share, store or save the imagery yourself, or ask a student to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
- Delete the imagery or ask the student to delete it.
- Ask the student(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
- Share information about the incident with other members of staff, the student(s) it involves or their, or other, parents and/or carers.
- Say or do anything to blame or shame any young people involved.

Children might share nudes because of threats and/or pressures from relationships. They might also want to send nudes, but this is usually because they believe they will get something in return. Sextortion is when someone threatens to share or distribute nude or semi-nude images of another person if they don't do what is asked. It can happen to anybody, but a large number of cases involve teenage boys. The explicit imagery may be used to blackmail the young person into sending more images, money, or in some cases, into recruiting more victims. Images can be both real and generated by artificial intelligence.

We are aware of and in response to incidents will use the [alert guidance](#) and support provided by the National Crime Agency and CEOP.

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

8.9.2 Initial review meeting

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

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

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

- The incident involves an adult.
- There is reason to believe that a young person has been coerced, extorted, or groomed, or if there are concerns about their capacity to consent (for example, owing to SEN)
- What the DSL knows about the images or videos suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any child in the images or videos is under 13.
- The DSL has reason to believe a student is at immediate risk of harm owing to the sharing of nudes and semi-nudes (for example, the young person is presenting as suicidal or self-harming)
- they become aware of a computer-generated indecent image of a child, commonly called 'deep fakes' and 'deep nudes' i.e. digitally manipulated or artificial intelligence-generated nude and semi-nude.

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

If a decision is made to view imagery, the DSL (or equivalent) would need to be satisfied that viewing:

- is the only way to make a decision about whether to involve other agencies because it is not possible to establish the facts from any child or young person involved

- is necessary to report it to a website, app, or suitable reporting agency (such as the IWF) to have it taken down, or to support the child or young person or parent or carer in making a report.
- is unavoidable because a child or young person has presented it directly to a staff member or nudes or semi-nudes have been found on an education setting's device or network.

If it is necessary to view the imagery, then the DSL (or equivalent) should:

- discuss the decision with the headteacher or a member of the senior leadership team.
- make sure viewing is undertaken by the DSL (or equivalent) or another member of the safeguarding team with delegated authority from the headteacher or a member of the senior leadership team.
- make sure viewing takes place with another member of staff present in the room, ideally the headteacher or a member of the senior leadership team. This staff member does not need to view the images.
- wherever possible, make sure viewing takes place on the premises of the education setting, ideally in the headteacher or a member of the senior leadership team's office.
- make sure wherever possible that they are viewed by a staff member of the same sex as the child or young person in the images.
- record how and why the decision was made to view the imagery in the safeguarding or child protection records, including who was present, why the nudes or semi-nudes were viewed and any subsequent actions. Ensure this is signed and dated and meets any appropriate wider standards e.g. such as those set out in statutory safeguarding guidance and local authority policies and procedures.
- If any devices need to be taken and passed onto the police, the device(s) should be confiscated, and the police should be called. The device should be disconnected from Wi-Fi and data and turned off immediately to avoid imagery being removed from the device remotely through a cloud storage service. The device should be placed in a secure place, for example in a locked cupboard or safe until the police are able to come and collect it.

Further details on searching, deleting and confiscating devices can be found in the DfE's [Searching, screening and confiscation advice](#)

8.9.3 Further review by the DSL

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

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

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

8.9.4 Informing parents/carers.

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

8.9.5 Referring to the police.

If it is necessary to refer an incident to the police, this will be done through the school's allocated safer schools' officer (contact details at the top of this policy). If we are unable to make contact with the safer school's officer, the incident will be reported via 101.

8.9.6 Recording incidents

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

8.9.7 Curriculum coverage

Students are taught about the issues surrounding sexting as part of our relationships and sex education. Teaching covers the following in relation to sexting:

- What it is
- How it is most likely to be encountered
- The consequences of requesting, forwarding, or providing such images, including when it is and is not abusive.
- Issues of legality
- The risk of damage to people's feelings and reputation

Students also learn the strategies and skills needed to manage:

- Specific requests or pressure to provide (or forward) such images.
- The receipt of such images

This section of the policy on sexting is also shared with students via our PSHE curriculum, so they are aware of the processes the school will follow in the event of an incident.

8.9.8 Support

Children and young people who have had their nudes or semi-nudes shared publicly should be:

- reassured that they have done the right thing by speaking to an adult and that the school and other adults are there to help.
- to delete images or videos from social media accounts (including from cloud photo backups) if they have uploaded them themselves.
- to use the IWF and [Childline's Report Remove tool](#). Report Remove helps children and young people to report an image shared online, to see if it is possible to get the image removed. This must be done as soon as possible in order to minimise the number of people that have seen the picture.
- taught on how to report sexual images or videos on individual sites to get them taken down. If the image has been shared via a mobile, they should be informed that they can contact the mobile phone operator to have a mobile number changed as this may stop others from contacting them.
- to speak to the school if they are concerned about any bullying behaviour.

Children and young people who have been sent a nude or semi-nude should be:

- reassured that they have done the right thing by speaking out and that the school and other adults are there to help.
- asked whether it was sent by an adult or another child or young person and if they requested the photo or if it was sent unsolicited.
- advised:
 - on the importance of reporting, it online if it has been shared.
 - to delete it from their devices and accounts
 - on the importance of not sharing the image further
 - if they asked to receive the photos, explain that they should not put pressure onto others to do things that they are uncomfortable with

Children and young people who have shared another child's or young person's nudes or semi-nudes should be asked:

- whether they asked for the photo or were initially sent it without requesting
- who the image has been sent to and where it has been shared. Agree next steps for taking the image down, including deleting the image from their phone or any social media accounts and reporting it to service providers.
- about their motivations for sharing the photo and discuss what they could have done differently. If they have reacted to an upsetting incident, such as the break-up of a relationship, by sending the photo onwards, talk about how they could have managed their feelings in a healthier and more positive way. Emphasise that whatever the reason, it is always wrong to share nudes and semi-nudes of another child or young person. This can be used as an opportunity to discuss the importance of consent and not putting pressure on others to take or share nudes and semi-nudes.
- advised on the law on the sharing of nudes and semi-nudes.

8.10 Reporting systems for our students

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

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

To achieve this, we will:

- put systems in place for students to confidently report abuse
- ensure our reporting systems are well promoted, easily understood and easily accessible for students
- make it clear to students that their concerns will be taken seriously, and that they can safely express their views and give feedback

Students are able to report concerns in a number of ways, such as:

- verbally via any member of staff
- to the safeguarding team via email at n.douglas@cornfields.kent.sch.uk or verbally to any member of the safeguarding Team

Students are reminded about the various forms for reporting concerns throughout the school year, via assemblies, RSE and PSHE lessons and form time sessions.

Students should report their concerns to:

- The DSL or Deputy
- Their form tutor
- Any adult in the school who they feel most comfortable talking to

We hope that all students feel safe in submitting any concerns to the school and seek to reassure all students who report to us that they have done the right thing.

9. Online safety and the use of mobile technology (including smartwatches)

We recognise the importance of safeguarding children from potentially harmful and inappropriate online material, and we understand that technology is a significant component in many safeguarding and wellbeing issues. Many children have unlimited and unrestricted access to the internet via mobile phone networks; therefore, children could be harmed or harm others online when at school. This may include sexually harassing, bullying, and sharing indecent images (often via large chat groups).

To address this, our school aims to:

- Have robust processes (including filtering and monitoring systems) in place to ensure the online safety of students, staff, volunteers, and advisory board members.
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community.
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate
- Ensuring appropriate filtering and monitoring systems are in place on the school's network and devices.

The 4 key categories of risk

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

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

To meet our aims and address the risks above, we will:

- Educate students about online safety as part of our curriculum.

For example:

- The safe use of social media, the internet and technology
- Keeping personal information private
- How to recognise unacceptable behaviour online
- How to report any incidents of cyber-bullying, ensuring students are encouraged to do so, including where they're a witness rather than a victim.
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying, the risks of online radicalisation, and the expectations, roles and responsibilities around filtering and monitoring. All staff members will receive refresher training as required and at least once each academic year.
- Educate parents/carers about online safety via our website, communications sent directly to them and coffee/information mornings/evenings. We will also share clear procedures with them, so they know how to raise concerns about online safety.
- Make sure staff are aware of any restrictions placed on them in regard to the use of their mobile phone and cameras, for example that: Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when students are not present
- Make all students, parents/carers, staff, volunteers, and advisory board members aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology.
- Explain the sanctions we will use if a student is in breach of our policies on the acceptable use of the internet and mobile phones.
- Make sure all staff, students and parents/carers are aware that staff have the power to search students' phones, as set out in the DfE's guidance on searching, screening and confiscation.
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems.
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community.
- Provide regular safeguarding and children protection updates including online safety to all staff, at least annually, in order to continue to provide them with the relevant skills and knowledge to safeguard effectively.
- Review the child protection and safeguarding policy, including online safety, annually and ensure the procedures and implementation are updated and reviewed regularly.

This section summarises our approach to online safety and mobile phone use. For full details about our school's policies in these areas, please refer to our **Online Safety policy**, which can be found on our website.

10. Notifying parents or carers

Where appropriate, we will discuss any concerns about a child with the child's parents or carers. The DSL will normally do this in the event of a suspicion or disclosure.

Other staff will only talk to parents or carers about any such concerns following consultation with the DSL.

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

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

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

- Meet with the parents or carers, with the victim, to discuss what's being put in place to safeguard them and understand their wishes in terms of what support they may need and how the report will be progressed.
- Meet with the alleged aggressor/instigators parents or carers to discuss support for them, and what's being put in place that will impact them, e.g. moving them out of classes with the victim, and the reason(s) behind any decision(s).

11. Students with special educational needs, disabilities, or health issues

At Cornfields School, our students have special educational needs (SEN) and disabilities. We recognise that students with SEND, or certain health conditions can face additional safeguarding challenges, and are 3 times more likely to be abused than their peers. Additional barriers can exist when recognising abuse and neglect in this group, including:

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

12. Children who are lesbian, gay, bi, or trans (LGBT+)

The fact that a child or a young person may be LGBT is not in itself an inherent risk factor for harm. However, children who are LGBT can be targeted by other children. In some cases, a child who is perceived by other children to be LGBT (whether they are or not) can be just as vulnerable as children who identify as LGBT.

Risks can be compounded where children who are LGBT lack a trusted adult with whom they can be open. It is therefore vital that staff endeavour to reduce the additional barriers faced and provide a safe space for them to speak out or share their concerns with members of staff. At Cornfields School this may be during 1:1 discussion in form time with their tutor, or perhaps with a trusted adult during a 1:1 session.

13. Students with a social worker

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

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

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

- Responding to unauthorised absence, absence for prolonged periods or missing education where there are known safeguarding risks.
- The provision of pastoral and/or academic support

14. Looked-after and previously looked-after children

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

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

15. Complaints and concerns about school safeguarding policies

15.1 Complaints against staff

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

15.2 Other complaints

All members of the school community should feel able to raise concerns about poor or unsafe practice and potential failures in the school's safeguarding regime, and that such concerns will be taken seriously by the DSL and SLT team.

Complaints regarding student, premises or procedures should be made to the safeguarding team via n.douglas@cornfields.kent.sch.uk or head teacher t.thompson@cornfields.kent.sch.uk. The safeguarding nominated governor can also be contacted via s.sherwood@cornfields.kent.sch.uk. All complaints will be investigated as per the school's Complaints policy and procedure, which is published on the school website.

15.3 Whistleblowing

The school's whistle-blowing procedures are in place for such concerns to be raised with the school's SLT team. Staff on induction are given a copy of the school's whistle-blowing policy, and it is referenced in safeguarding refreshers for all staff.

If a member of staff feels unable to raise an issue with the school or feels their concerns are not being addressed, other whistle-blowing channels may be open to them, such as:

The NSPCC whistle-blowing helpline – 0800 028 0285 (open from 8am to 8pm Monday to Friday and on email at help@nspcc.org.uk)

Please see the school's separate whistle-blowing policy for further details.

16. Record keeping

We will hold records in line with our records' retention schedule.

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

Records will include:

- A clear and comprehensive summary of the concern
- Details of how the concern was followed up and resolved.
- A note of any action taken, decisions reached and the outcome.

Each child has a safeguarding file where all safeguarding concerns and referrals are stored. The DSL is responsible for keeping records of all concerns, discussions, and decisions, including the rationale for those decisions. Records reflect the reason referrals are or are not made to another agency, such as children's services or the Prevent program. Safeguarding files will be stored securely, and access will only be given to those who need it.

Any non-confidential records will be readily accessible and available. Confidential information and records will be held securely and only available to those who have a right or professional need to see them. Safeguarding records relating to individual children will be retained for a reasonable period after they have left the school.

If a child for whom the school has, or has had, safeguarding concerns moves to another school, the DSL and DDSL will ensure that their child protection file is forwarded as soon as possible, securely, and separately from the main student file.

To allow the new school/college to have support in place when the child arrives, this should be within:

- 5 days for an in-year transfer, or within
- The first 5 days of the start of a new term

In addition, if the concerns are significant or complex, and/or social services are involved, the DSL will speak to the DSL of the receiving school and provide information to enable them to have time to make any necessary preparations to ensure the safety of the child.

The majority of the safeguarding evidence is stored electronically via CPOMS. Any paper-based documents are stored in a file separate from the student's school file.

Only the DSL and DDSs have full access to the files and information on CPOMS. Key staff can be given limited access to safeguarding information on CPOMS on a case-by-case basis should the need arise.

If safeguarding information is required by outside agencies, then this is transferred electronically via a secure email site such as Egress.

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

17. Training

17.1 All staff

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

This training will be regularly updated (at least yearly) and will:

- Be integrated, aligned, and considered as part of the whole-school safeguarding approach and wider staff training, and curriculum planning.
- Be in line with advice from the 3 safeguarding partners.
- Include online safety, including an understanding of the expectations, roles, and responsibilities for staff around filtering and monitoring.
- Have regard to the Teachers' Standards to support the expectation that all teachers:
 - Manage behaviour effectively to ensure a good and safe environment
 - Have a clear understanding of the needs of all students

Safeguarding refresher training for all staff is revisited on the first INSET day of each academic year.

Staff will also have discussions during induction on:

- the behaviour policy, which will include measures to prevent bullying, including cyberbullying, prejudice-based and discriminatory bullying.
- the staff code of conduct, which will include low-level concerns, allegations against staff and whistleblowing.
- information on the safeguarding response to children who go missing from education, who are absent from education, who have repeat periods of absence and role of the designated

safeguarding lead (including the identity of the designated safeguarding lead and any deputies)

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being radicalised into terrorism and to challenge extremist ideas

Staff will also receive regular safeguarding and child protection updates, including on online safety, as required but at least annually (for example, through emails, the staff bulletin, and staff meetings).

Volunteers will receive appropriate training, if applicable.

Relevant policies and procedures are digitally shared, such as the school's Child Safeguarding policy, Online safety policy, Staff code of conduct, Behaviour policy, Child missing education policy and KCSiE.

17.2 The DSL and DDSLs

The Designated Safeguarding Lead and Deputies complete Multi Agency Level 3 Safeguarding training every 2 years as set out KCSiE. In addition, they will update their knowledge and skills at regular intervals and at least annually (for example, through bulletins, meeting other DSLs, safeguarding forums, or taking time to read and digest safeguarding developments).

They will also undertake Prevent awareness training.

17.3 Advisory Board Members

All advisory board members receive training about safeguarding and child protection (including online safety) at induction, which is regularly updated. This is to make sure that they:

- Have the knowledge and information needed to perform their functions and understand their responsibilities, such as providing strategic challenge.
- Can be assured that safeguarding policies and procedures are effective and support the school to deliver a robust whole-school approach to safeguarding.

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

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

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

17.4 Support for staff

We recognise that staff working in the school who have become involved with a child who has suffered harm, or appears to be likely to suffer harm, may find the situation stressful and upsetting.

We will support such staff by providing an opportunity to talk through their anxieties with the DSL and to seek further support as appropriate. The DSL should seek support from the advisory board member responsible for safeguarding and the chair of the advisory board. The DDSL should seek support from the DSL/Head.

18. Monitoring and review

The DSL will annually review this policy. At every review, the full governing board will approve it.

The Governors will ensure that any deficiencies or weaknesses regarding child protection arrangements are remedied without delay.

19. Links with other policies and procedures

This policy links to the following policies and procedures:

- Behaviour
- Staff code of conduct
- Complaints
- Health and safety
- Attendance
- Online safety, inc the AUPs
- Relationships and sex education
- First aid
- Curriculum
 - Anti-bullying
- Whistleblowing
- Privacy notices
- GDPR

These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education.

Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

- Conveying to a child that they are worthless or unloved, inadequate, or valued only as far as they meet the needs of another person.
- Not giving the child opportunities to express their views, deliberately silencing them or 'making fun' of what they say or how they communicate.
- Age or developmentally inappropriate expectations being imposed on children. These may include interactions that are beyond a child's developmental capability, as well as overprotection and limitation of exploration and learning, or preventing the child participating in normal social interaction.
- Seeing or hearing the ill-treatment of another
- Serious bullying (including cyber-bullying), causing children frequently to feel frightened or in danger, or the exploitation or corruption of children.

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

- 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.
- 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)

Neglect is the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in the serious impairment of the child's health or development. Neglect may occur during pregnancy because 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 caregivers)
- Ensure access to appropriate medical care or treatment.

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

Appendix 2: safer recruitment and DBS checks – policy and procedures

Please see the following policies and procedures for detailed information on the above topics:

- Appointment and Induction of Advisory Body Procedures
- Safe Recruitment Policy
- Recruitment, Selection and Disclosures Policy and Procedure
- Staff Code of Conduct

Recruitment and selection process

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

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

Advertising

When advertising roles, we will make clear:

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

Application forms

Our application forms will:

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

Shortlisting

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

- Consider any inconsistencies and look for gaps in employment and reasons given for them
- Explore all potential concerns

Once we have shortlisted candidates, we will ask shortlisted candidates to:

- Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they could share relevant information and discuss it at interview stage.

The information we will ask for includes:

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

We will also carry out an online search on shortlisted candidates to help identify any incidents or issues that are publicly available online. Shortlisted candidates will be informed that we may carry out these checks as part of our due diligence process.

Seeking references and checking employment history

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

When seeking references, we will:

- Not accept open references
- Liaise directly with referees and verify any information contained within references with the referees.
- Ensure any references are from the candidate's current employer and completed by a senior person. Where the referee is school based, we will ask for the reference to be confirmed by the headteacher/principal as accurate in respect to disciplinary investigations.
- Obtain verification of the candidate's most recent relevant period of employment if they are not currently employed.
- Secure a reference from the relevant employer from the last time the candidate worked with children if they are not currently working with children.
- Compare the information on the application form with that in the reference and take up any inconsistencies with the candidate.

Resolve any concerns before any appointment is confirmed.

Interview and selection.

When interviewing candidates, we will:

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

Pre-appointment vetting checks

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

New staff

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

- Verify their identity.
- Obtain (via the applicant) an enhanced DBS certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will obtain the certificate before, or as soon as practicable after, appointment, including when using the DBS update service. We will not keep a copy of the certificate for longer than 6 months, but when the copy is destroyed, we may keep a record of the fact that vetting took place, the result of the check and recruitment decision taken.
- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available.
- Verify their mental and physical fitness to carry out their work responsibilities.
- Verify their right to work in the UK. Right to work in the UK can now be proved via share code and government guidance is that employees are advised of how to create their UKVI accounts.
- We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards.
- Verify their professional qualifications, as appropriate.
- Ensure they are not subject to a prohibition order if they are employed to be a teacher.
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK. These could include, where available:
 - For all staff, including teaching positions: criminal records check for overseas applicants
 - For teaching positions: obtaining a letter from the professional regulating authority in the country where the applicant has worked, confirming that they have not imposed any sanctions or restrictions on that person, and/or are aware of any reason that person may be unsuitable to teach
 - Check that candidates taking up a management position* are not subject to a prohibition from management (section 128) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, headteachers, principals and deputy/assistant headteachers.

Regulated activity means a person who will be:

- Responsible, on a regular basis in a school or college, for teaching, training, instructing, caring for or supervising children; or
- Carrying out paid, or unsupervised unpaid, work regularly in a school or college where that work provides an opportunity for contact with children; or

- Engaging in intimate or personal care or overnight activity, even if this happens only once and regardless of whether they are supervised or not.

Existing staff

In certain circumstances we will carry out all the relevant checks on existing staff as if the individual was a new member of staff. These circumstances are when:

- There are concerns about an existing member of staff's suitability to work with children; or
- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more.

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

We believe the individual has engaged in [relevant conduct](#); or

We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#); or

We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and

The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left.

Agency and third-party staff

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

Contractors

We will ensure that any contractor, or any employee of the contractor, who is to work at the school has had the appropriate level of DBS check (this includes contractors who are provided through a PFI or similar contract). This will be:

- An enhanced DBS check with barred list information for contractors engaging in regulated activity.
- An enhanced DBS check, not including barred list information, for all other contractors who are not in regulated activity but whose work provides them with an opportunity for regular contact with children.

We will obtain the DBS check for self-employed contractors.

We will not keep copies of such checks for longer than 6 months.

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

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

Trainee/student teachers

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

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

Volunteers

We will:

- Never leave an unchecked volunteer unsupervised or allow them to work in regulated activity.
- Obtain an enhanced DBS check with barred list information for all volunteers who are new to working in regulated activity.
- Carry out a risk assessment when deciding whether to seek an enhanced DBS check without barred list information for any volunteers not engaging in regulated activity. We will retain a record of this risk assessment.

Advisory Board

All governors will have an enhanced DBS check without barred list information. They will have an enhanced DBS check with barred list information if working in regulated activity. The chair of the board will have their DBS check countersigned by the secretary of state.

All proprietors and advisory board members will also have the following checks:

- A section 128 check (to check prohibition on participation in management under [section 128 of the Education and Skills Act 2008](#)). [Section 128 checks are only required for local governors if they have retained or been delegated any management responsibilities.]
- Identity
- Right to work in the UK
- Other checks deemed necessary if they have lived or worked outside the UK.

Adults who supervise students on work experience

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

We will also consider whether it is necessary for barred list checks to be carried out on the individuals who supervise a student under 16 on work experience. This will depend on the specific

circumstances of the work experience, including the nature of the supervision, the frequency of the activity being supervised, and whether the work is regulated activity.

Appendix 3: allegations of abuse made against staff.

Allegations against staff (including low-level concerns)

Section 1: allegations that may meet the harms threshold

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer, or contractor, has behaved in a way that has harmed a child, or may have harmed a child, and/or possibly committed a criminal offence against or related to a child, and/or behaved towards a child or children in a way that indicates they may pose a risk of harm to children, and/or behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school.

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

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

A 'case manager' will lead any investigation. This will be the headteacher, or the chair of governors where the headteacher is the subject of the allegation. The case manager will be identified at the earliest opportunity.

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

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

Suspension of the accused until the case is resolved

Suspension of the accused will not be the default position and will only be considered in cases where there is reason to suspect that a child or other children is/are at risk of harm, or the case is so serious that there might be grounds for dismissal. In such cases, we will only suspend an individual if we have considered all other options available and there is no reasonable alternative. Based on an assessment of risk, we will consider alternatives such as:

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned.
- Providing an assistant to be present when the individual has contact with children.
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children.
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment, and parents/carers have been consulted.

If in doubt, the case manager will seek views from the school's support service (HR) and the designated officer at the local authority, as well as the police and children's social care where they have been involved.

Definitions for outcomes of allegation investigations

Substantiated: there is sufficient evidence to prove the allegation

Malicious: there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive, or to cause harm to the subject of the allegation

False: there is sufficient evidence to disprove the allegation

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

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

Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the case manager will take the following steps:

1. Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below.
2. Discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children's social care services. (The case manager may, on occasion, consider it necessary to involve the police before consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
3. Inform the accused individual of the concerns or allegations and course of action as soon as possible after speaking to the designated officer (and the police or children's social care services, where necessary). Where the police and/or children's social care services

are involved, the case manager will only share such information with the individual as has been agreed with those agencies.

4. Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police, and/or children's social care services, as appropriate.
5. Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care.
6. If immediate suspension is considered necessary, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details.
7. If it is decided that no further action is to be taken in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
8. If it is decided that further action is needed, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate.
9. Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and considering what other support is appropriate. Further support may be offered via the use of the school's counselling service, and the staff member will be reminded about support they can receive from their union representatives.
10. Inform the parents or carers of the child/children involved about the allegation as soon as possible if they do not already know (following agreement with children's social care services and/or the police, if applicable). The case manager will also inform the parents or carers of the requirement to maintain confidentiality about any allegations made against teachers (where this applies) while investigations are ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice.
11. Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)
12. Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child.

If the school is made aware that the secretary of state has made an interim prohibition order in respect of an individual, we will immediately suspend that individual from teaching, pending the findings of the investigation by the Teaching Regulation Agency.

Where the police are involved, wherever possible the school will ask the police at the start of the investigation to obtain consent from the individuals involved to share their statements and evidence for use in the school's disciplinary process, should this be required at a later point.

Additional considerations for supply teachers and all contracted staff

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

- We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome.
- The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation.
- We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required.
- We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are considered (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

Timescales

We will deal with all allegations as quickly and effectively as possible and will endeavour to comply with the following timescales, where reasonably practicable:

- Any cases where it is clear immediately that the allegation is unsubstantiated or malicious should be resolved within 1 week.
- If the nature of an allegation does not require formal disciplinary action, appropriate action should be taken within 3 working days.
- If a disciplinary hearing is required and can be held without further investigation, this should be held within 15 working days.

However, these are objectives only and where they are not met, we will endeavour to take the required action as soon as possible thereafter.

Specific actions

Action following a criminal investigation or prosecution.

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

Conclusion of a case where the allegation is substantiated.

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.

If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

Individuals returning to work after suspension.

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

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

Unsubstantiated, unfounded, false, or malicious reports

If a report is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the DSL will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Unsubstantiated, unfounded, false, or malicious allegations

If an allegation is:

- Determined to be unsubstantiated, unfounded, false, or malicious, the LADO and case manager will consider the appropriate next steps. If they consider that the child and/or person who made the allegation needs help, or the allegation may have been a cry for help, a referral to children's social care may be appropriate.
- Shown to be deliberately invented, or malicious, the school will consider whether any disciplinary action is appropriate against the individual(s) who made it.

Confidentiality and information sharing

The school will make every effort to maintain confidentiality and guard against unwanted publicity while an allegation is being investigated or considered.

The case manager will take advice from the LADO, police, and children's social care services, as appropriate, to agree:

- Who needs to know about the allegation and what information can be shared?
- How to manage speculation, leaks, and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality.

What, if any, information can be given to the wider community to reduce speculation

- How to manage press interest if, and when, it arises

Record-keeping

The case manager will maintain clear records about any case where the allegation or concern meets the criteria above and store them on the individual's confidential personnel file for the duration of the case.

The records of any allegation that, following an investigation, is found to be malicious or false will be deleted from the individual's personnel file (unless the individual consents for the records to be retained on the file).

For all other allegations (which are not found to be malicious or false), the following information will be kept on the file of the individual concerned:

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved.
- Notes of any action taken, decisions reached and the outcome.
- A declaration on whether the information will be referred to in any future reference.

In these cases, the school will provide a copy to the individual, in agreement with children's social care or the police as appropriate.

We will retain all records at least until the accused individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

References

When providing employer references, we will:

- Not refer to any allegation that has been found to be false, unfounded, unsubstantiated, or malicious, or any repeated allegations which have all been found to be false, unfounded, unsubstantiated, or malicious.
- Include substantiated allegations, provided that the information is factual and does not include opinions.

Learning Lessons

After any cases where the allegations are substantiated, the case manager will review the circumstances of the case with the local authority's designated officer to determine whether there are any improvements that we can make to the school's procedures or practice to help prevent similar events in the future.

This will include consideration of (as applicable):

- Issues arising from the decision to suspend the member of staff.
 - The duration of the suspension
 - Whether or not the suspension was justified
- The use of suspension when the individual is subsequently reinstated. We will consider how future investigations of a similar nature could be carried out without suspending the individual.

For all other cases, the case manager will consider the facts and determine whether any improvements can be made.

Non-recent allegations

Abuse can be reported, no matter how long ago it happened.

We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.

Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

Section 2: concerns that do not meet the harm threshold (Low-Level Concerns)

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

Concerns may arise through, for example:

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

We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children. Cornfields School seeks to ensure that all staff who work with

children behave appropriately and to enable the early identification and prompt and appropriate management of concerns.

All staff must be able to identify concerning, problematic or inappropriate behaviour and understand the importance of sharing concerns when they observe behaviour which violates the School's Staff Code of Conduct.

Definition of low-level concerns

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

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

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

- Being overly friendly with children
- Having favourites
- Taking photographs of children on their mobile phone (see the online safety policy for guidance on this)
- Engaging with a child on a one-to-one basis in a secluded area or behind a closed door •
Humiliating students

We want to create a culture in which all concerns about adults are shared responsibly and with the right person, recorded and dealt with appropriately. This should:

- enable us to identify inappropriate, problematic, or concerning behaviour early.
- minimise the risk of abuse, and
- ensure that adults working in or on behalf of the school are clear about professional boundaries and act within these boundaries.

Low Level Concerns Data protection and Confidentiality

The school will always respect the personal data of staff (and others, where they may be identifiable) in implementing the Low-Level Concerns procedures and in keeping records of low-level concerns secure.

All staff are entitled, under data protection law, to ask to see the content of any low-level concern(s) retained by the School under the Low-Level Concerns Policy as it relates to them personally and to make any reasonable objection as to the fairness or accuracy of that content. Cornfields school will process such requests within the period prescribed by law, subject always to any necessary protection of the rights of third parties and unless any other relevant exemptions apply (including if complying with the request would be likely to prejudice the safeguarding purpose of the Low-Level Concerns procedures). If the content of a low-level concern is disputed, it may not be appropriate for the school to delete or alter the original record, but a note may be recorded alongside reflecting the staff member's alternative account or objection(s).

Staff are encouraged to consent to be named when sharing low-level concerns, as this will help to create a culture of openness and transparency. If the staff member who raises a low-level concern does not wish to be named, the school will respect that person's wishes as far as possible. However, there may be circumstances where the staff member will need to be named (for example, where disclosure is required by a court or local authority, or under a fair disciplinary process) and, for this reason, the School will not promise anonymity to members of staff who share low-level concerns.

Reporting and sharing low-level concerns.

It is important that low-level concerns are shared with the Head as soon as reasonably possible and, in any event, within 24 hours of becoming aware of it (where the concern relates to a particular incident) – although it is never too late to share a low-level concern.

If the Head is absent for any reason, low-level concerns should be shared with the DSL.

If any low-level concern relates to the behaviour of the Head, it should be referred to the Chair of the Advisory Board.

All low-level concerns will be recorded in writing. The record should include details of the concern, the context in which the concern arose, and action taken. The name of the individual sharing their concerns should also be noted, if the individual wishes to remain anonymous then that should be respected as far as reasonably possible.

If there is a conflict of interest in sharing a low-level concern with the Head, the low-level concern should be shared with the Chair of the advisory body, unless there is conflict of interest in doing so, in which case it should be reported directly to the LADO.

Unless the low-level concern is concerning the Head, the Head will be the ultimate decision maker in respect of all low-level concerns, having consulted with, if appropriate, the LADO.

All low-level concerns raised will be recorded and dealt with promptly; they will be kept securely and reviewed to notice any patterns of behaviour and kept until the person is no longer in employment.

Self-referral

Occasionally a member of staff may find themselves in a situation which could be misinterpreted or might appear compromising to others. Equally, a member of staff may, for whatever reason, have behaved in a manner which, on reflection, they consider falls below the standard set out in the School's Staff Code of Conduct. Self-reporting in these circumstances can be positive for a number of reasons and staff are encouraged to self-report on the basis that:
it is self-protective, in that it enables a potentially difficult issue to be addressed at the earliest opportunity.

it demonstrates awareness of the expected behavioural standards and self-awareness as to the member of staff's own actions or how they could be perceived; and crucially, it is an important

means of maintaining a culture where everyone aspires to the highest standards of conduct and behaviour.

The school's aim is to create an environment where staff are encouraged and feel confident to self-refer.

Responding to low-level concerns

Once the Head has received the low-level concern, they will – not necessarily in the below order but in an appropriate sequence according to the nature and detail of the particular concern shared with them:

- Speak to the person who raised the low-level concern (unless it has been raised anonymously).
- Speak to any potential witnesses (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- Speak to the individual about whom the low-level concern has been raised (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted).
- If they are in any doubt, seek advice from the LADO – on a no-names basis if necessary.
- Review the information and determine whether the behaviour in question:
 - is entirely consistent with the School's Staff Code of Conduct and the law.
 - constitutes a low-level concern.
 - is not serious enough to consider a referral to the LADO but may merit consulting with and seeking advice from the LADO, and on a no-names basis if necessary.
 - when considered with any other low-level concerns previously raised about the same person, could now meet the threshold of an allegation, and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy and Procedures, KCSIE, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership; or
 - in and of itself meets the threshold of an allegation and should be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding and Child Protection Policy and Procedures, KCSIE, and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.
- Ensure that appropriate and detailed records are kept of all internal and external conversations regarding the concern, their determination, the rationale for their decision and any actions taken, and retain records in accordance with the Low-Level Concerns Policy.
- Consider whether the concern also potentially raises misconduct or capability issues, taking specialist advice where necessary and, if so, to follow the school's disciplinary or capability procedures set out in the Performance Management Policy.

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

What action will be taken if it is determined that the behaviour is entirely consistent with the School's Staff Code of Conduct and the law?

The Head will update the individual in question and inform them of any action taken (as above). The Head will speak to the person who shared the low-level concern – to provide them with feedback about how and why the behaviour is consistent with the School's Staff Code of Conduct and the law.

What action will be taken if it is determined that the behaviour constitutes a low-level concern?

The Head will respond in a sensitive and proportionate way – on the one hand maintaining confidence that such concerns when raised will be handled promptly and effectively, whilst on the other hand protecting staff from any potential false allegations or misunderstandings. Any investigation of low-level concerns will be done discreetly and, on a need, -to-know basis.

Most low-level concerns by their very nature are likely to be minor. Some will not give rise to any ongoing concern and, accordingly, will not require any further action. Others may be most appropriately dealt with by means of management guidance and/or training. In many cases, a low-level concern will simply require a conversation with the individual about whom the concern has been raised.

Any such conversation with individuals in these circumstances will include being clear with them as to why their behaviour is concerning, problematic or inappropriate, what change is required in their behaviour, enquiring what, if any, support they might need in order to achieve and maintain that and being clear about the consequences if they fail to reach the required standard or repeat the behaviour in question. Ongoing and transparent monitoring of the individual's behaviour may be appropriate. An action plan or risk assessment which is agreed with the individual, and regularly reviewed with them may also be appropriate.

Some low-level concerns may also raise issues of misconduct or poor performance. The Head will consider whether this is the case, taking specialist advice where necessary.

If the Head decides that the school's disciplinary or capability procedure should be triggered, the individual will have a full opportunity to respond to any factual allegations which form the basis of capability concerns or a disciplinary case against them.

Staff should be aware that when they share what they believe to be a low-level concern, the Head will speak to the adult who is the subject of that concern (unless advised not to do so by the LADO/other relevant external agencies, where they have been contacted) – no matter how 'low' level the concern may be perceived to be, to gain the subject's account – and to make appropriate records (as above), which may be referenced in any subsequent disciplinary proceedings.

How the School responds to a low-level concern may be different depending on the employment status of the individual who is the subject of the concern - i.e. whether they are an employee or worker to whom the School's disciplinary and/or capability procedure would apply; or a contractor, Advisory Board Member, or volunteer. The school's response will be tailored accordingly.

What action will be taken if it is determined that the behaviour merits contact with the LADO or referral to other external agencies?

If the behaviour of a staff member was not sufficiently serious to consider a referral to the LADO but merits consulting with and seeking advice from the LADO, then action (if/as necessary) will be taken in accordance with the LADO's advice.

If the behaviour of a staff member when considered with any other low-level concerns that have previously been shared about the same individual, could now meet the threshold of an allegation, or in and of itself meets the threshold of an allegation, then it will be referred to the LADO/other relevant external agencies, and in accordance with the School's Safeguarding Policy and Procedures, KCSIE and the relevant procedures and practice guidance stipulated by the School's Local Safeguarding Partnership.

Record keeping

All low-level concerns will be recorded in writing. These can be verbally given to Head, but they will be written down and logged in the school's low level concerns log. In addition to details of the concern raised, records will include the context in which the concern arose, any action taken and the rationale for decisions and action taken.

Records will be:

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

In most cases, once a staff member leaves the school, any low-level concerns which are held relating to them:

- will be retained for a further six years in accordance with the school's data record retention policy; and
- will not be included in any onward reference, except as set out at in the 'References' section below.

References

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

Spectrum Of Behaviour Chart

Allegation

Behaviour which indicates that an adult who works with children has:

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

Low-Level Concern

Does not mean that it is insignificant, it means that the adult's behaviour towards a child does not meet the threshold set out above. A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' – that an adult may have acted in a way that:

- is inconsistent with the School's Staff Code of Conduct, including inappropriate conduct outside of work; and
- does not meet the allegation threshold or is otherwise not serious enough to consider a referral to the LADO – but may merit consulting with and seeking advice from the LADO, on a no-names basis if necessary.

Appropriate Conduct

Behaviour which is entirely consistent with the School's Staff Code of Conduct, and the law.

Appendix 4: specific safeguarding concerns

This section of the policy is closely linked to the advice in Keeping Children Safe in Education, in particular annex B. Annex B includes further information about other safeguarding issues to be aware of. Those areas listed below are those that we as a school and our safeguarding partnership have identified as key areas of concern for our setting and locality.

Children who are absent from education

All staff will be aware that children missing from education or absent persistently, without explanation and/or for prolonged periods can act as a vital warning sign to a range of safeguarding issues including neglect, child sexual and child criminal exploitation - particularly county lines.

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

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

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

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

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

Please see the Child Missing Education Policy & Procedure for further detail

Child criminal exploitation

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

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

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

Indicators of CCE can include a child:

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

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

Child sexual exploitation

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

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

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

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

In addition to the CCE indicators above, indicators of CSE can include a child:

- Having an older boyfriend or girlfriend
- Suffering from sexually transmitted infections or becoming pregnant.

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

Child-on-child abuse, including sexual violence and sexual harassment.

Child-on-child abuse is when children abuse other children. This type of abuse can take place inside and outside of school. It can also take place both face-to-face and online and can occur simultaneously between the 2.

Our school has a zero-tolerance approach to sexual violence and sexual harassment. We recognise that even if there are no reports, which does not mean that this kind of abuse is not happening.

Child-on-child abuse is most likely to include, but may not be limited to:

- Bullying (including cyber-bullying, prejudice-based and discriminatory bullying)
- Abuse in intimate personal relationships between children (this is sometimes known as 'teenage relationship abuse')
- Physical abuse such as hitting, kicking, shaking, biting, hair pulling, or otherwise causing physical harm (this may include an online element which facilitates, threatens, and/or encourages physical abuse)
- Sexual violence, such as rape, assault by penetration and sexual assault (this may include an online element which facilitates, threatens, and/or encourages sexual violence)
- Sexual harassment, such as sexual comments, remarks, jokes, and online sexual harassment, which may be standalone or part of a broader pattern of abuse.
- Causing someone to engage in sexual activity without consent, such as forcing someone to strip, touch themselves sexually, or to engage in sexual activity with a third party.
- Consensual and non-consensual sharing of nude and semi-nude images and/or videos (also known as sexting or youth produced sexual imagery)
- Upskirting, which typically involves taking a picture under a person's clothing without their permission, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress, or alarm.
- Initiation/hazing type violence and rituals (this could include activities involving harassment, abuse or humiliation used as a way of initiating a person into a group and may also include an online element)

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

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

When considering instances of harmful sexual behaviour between children, we will consider their ages and stages of development. We recognise that children displaying harmful sexual behaviour have often experienced their own abuse and trauma and will offer them appropriate support.

Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse (abuse in intimate personal relationships between children) and child/adolescent to parent violence and abuse. It can be physical, sexual, financial, psychological, or emotional. It can also include ill treatment that is not physical, as well as witnessing the ill treatment of others – for example, the impact of all forms of domestic abuse on children.

Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home. Children who witness domestic abuse are also victims.

Older children may also experience and/or be the perpetrators of domestic abuse and/or violence in their own personal relationships. This can include sexual harassment.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children and affect their health, wellbeing, development, and ability to learn.

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

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

Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare. The DSL and deputy will be aware of contact details and referral routes into the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).

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

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

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

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

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

FGM

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

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

Indicators that FGM has already occurred include:

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

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

- The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
- FGM being known to be practised in the girl's community or country of origin.
- A parent or family member expressing concern that FGM may be carried out.
- A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues.

A girl:

- Having a mother, older sibling or cousin who has undergone FGM.
- Having limited level of integration within UK society

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

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

Forced Marriage

Forcing a person into marriage is a crime. A forced marriage is one entered without the full and free consent of 1 or both parties and where violence, threats, or any other form of coercion is used to cause a person to enter into a marriage. Threats can be physical or emotional and psychological.

It is also illegal to cause a child under the age of 18 to marry, even if violence, threats, or coercion are not involved. This includes non-binding, unofficial ‘marriages’ as well as legal marriages.

Staff will receive training around forced marriage and the presenting symptoms. We are aware of the ‘1 chance’ rule, i.e. we may only have 1 chance to speak to the potential victim and only 1 chance to save them.

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

The DSL will:

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

Preventing radicalisation and extremism

Radicalisation is the process of a person legitimising support for, or use of, terrorist violence. It can occur over a period or quickly.

Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces.

Terrorism is an action that:

- Endangers or causes serious violence to a person/people.
- Causes serious damage to property; or
- Seriously interferes or disrupts an electronic system.

The use or threat of terrorism must be designed to influence the government or to intimidate the public and is made for the purpose of advancing a political, religious, or ideological cause.

Schools have a duty to prevent children from being radicalised into terrorism. To prevent children being radicalised into terrorism, we make sure:

- The DSL will undertake Prevent awareness training and make sure that staff have access to appropriate training to equip them to identify children at risk.
- We will ensure that suitable internet filtering and monitoring is in place and equip our students to stay safe online at school and at home.
- We perform a risk assessment which assesses how our learners or staff may be at risk of being radicalised into terrorism (including online) using the counter terrorism local profile and updates from the local partnership.

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period. While some children are more susceptible, any child can be radicalised into terrorism. We take our [statutory duty](#) to prevent children from becoming terrorists or supporting terrorism seriously.' Staff will be alert to changes in students' behaviour.

The government website [Educate Against Hate](#) and charity [NSPCC](#) say that signs that a child is being radicalised can include:

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

Children who are at risk of radicalisation may have low self-esteem or be victims of bullying or discrimination. It is important to note that these signs can also be part of normal teenage

behaviour – staff should have confidence in their instincts and seek advice if something feels wrong.

If staff are concerned about a student, they will follow our procedures set out in section 7.5 of this policy, including discussing their concerns with the DSL. Staff/advisory body members can also raise concerns by emailing counter.extremeism@education.gsi.gov.uk, but this is not to be used in emergency situations. If you believe you have information relating to terrorism, you can call the anti-terrorist hotline on 0800 789 321.

if worried, staff should **always** act.

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

- Anti-Bullying Policy
- Behaviour Policy
- PREVENT and upholding British Values Policy
- PSHE Policy
- Spiritual Moral Social & Cultural Policy

Sexual violence and sexual harassment between children in schools

Sexual violence and sexual harassment can occur:

- Between 2 children of any age and sex
- Through a group of children sexually assaulting or sexually harassing a single child or group of children
- Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.

Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, likely, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

When supporting victims, staff will:

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

- Remain alert to the possible challenges of detecting signs that a child has experienced sexual violence and show sensitivity to their needs.

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

Staff should be aware of the importance of:

- Challenging inappropriate behaviours
- Making clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.
- Challenging physical behaviours (potentially criminal in nature), such as grabbing bottoms, breasts, and genitalia, pulling down trousers, flicking bras and lifting skirts. Dismissing or tolerating such behaviours risks normalising them

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

Serious violence

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

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

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

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

Being the victim of, carrying out or allegedly carrying out serious violence (e.g. knife crime) may indicate that a child is involved in county lines.

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

Checking the identity and suitability of visitors

All visitors will be required to verify their identity to the satisfaction of staff and are asked to turn their mobile phone off and out of sight for their visit.

If the visitor is unknown to the setting, we will check their credentials and reason for visiting before allowing them to enter the setting. Visitors should be ready to produce identification. Visitors are expected to sign the visitors' book and wear a visitor's badge.

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

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

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

Non-collection of children and Missing Students

See the Child Missing Education Policy & Procedure for further details.

Elective home education (EHE)

Many homes educated children have an overwhelmingly positive learning experience. However, this is not the case for all, and home education can mean some children are less visible to the services that are there to keep them safe and supported in line with their needs.

From September 2016 the Education (Pupil Registration) (England) Regulations 2006 were amended so that schools must inform their LA of all deletions from their admission register when a child is taken off roll. Where a parent/carer has expressed their intention to remove a child from school with a view to educating at home, the DfE recommends that LAs, schools, and other key professionals work together to coordinate a meeting with parents/carers where possible.

For a child with an Education Health and Care Plan (EHCP), if a parent or carer expresses intention to remove a child from school with the view to educating them at home the school will contact the local authority and the plan will need to be reviewed working closely with parents and carers.

Mental Health

Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. It is key that staff are aware of how these children's experiences, can impact on their mental health, behaviour, and education.

More information can be found in the **DfE Mental health and behaviour in schools' guidance** and in our own **Mental Health Procedures**.

Online safety

For the full information on how the school manages online safety, see the **Online Safety Policy**.

Private Fostering

A private fostering arrangement occurs when someone other than a parent or a close relative care for a child for a period of 28 days or more, with the agreement of the child's parents. Close relatives are defined as stepparents, grandparents, brothers, sisters, uncles, or aunts. It applies to children under the age of 16, or under 18 if the child is disabled. Children looked after by the local authority or who are placed in a residential school, children's home or hospital are not considered to be privately fostered.

Private fostering occurs in all cultures, including British culture and children may be privately fostered at any age.

Cornfields recognises that most privately fostered children remain safe and well, but safeguarding concerns have been raised in some cases. Therefore, all staff are alert to possible safeguarding issues, including the possibility that a child has been trafficked into the country.

By law, a parent, private foster carer, or other persons involved in making a private fostering arrangement must notify Children's Social Care as soon as possible. When name of school becomes aware of a private fostering arrangement for a student that has not been notified to Children's Social Care, we will encourage parents and private foster carers to notify Children's Social Care themselves in the first instance, but also alert them to our mandatory duty as a school to inform the local authority of children in such arrangements.

Remote Education

A small number of students at Cornfields School may be on a full or partial remote timetable. This will be agreed by SLT, parents/carers and the Local Authority.

Cornfields School ensures that appropriate filters and monitoring systems are in place to protect students when they are online at home as well as in school.

It is important that all staff who interact with children online continue to look out for signs a child may be at risk. Any such concerns should be dealt with in line with this Safeguarding Policy and

where appropriate referrals should still be made to children's social care and as required, the police.

Cornfields School will ensure any use of online learning tools and systems is in line with privacy and data protection/GDPR requirements.

Below are some things to consider when delivering remote lessons, especially where webcams are involved:

- Children must wear suitable clothing, as should anyone else in the household.
- Any computers used should be in appropriate areas, for example, not in bedrooms; and the background should be clear.
- Any virtual lesson, meeting or 1:1 where staff are alone with a student must be recorded (these are automatically saved on to the Cloud in case there should be any query about content or breaches of codes later)
- Language must be professional and appropriate, including any family members in the background.

Cornfields School is committed to ensuring the safety and wellbeing of all its students, this of course includes all students who are working remotely at home. We will continue to provide support for students who may have to work from home, by e.g. delivering support over the phone or getting help from relevant specialist support services.

Cornfields school will ensure that it is in regular contact with the parents of carers of students who have any remote learning provision. In addition to assessing the remote provision these communications will be used to reinforce the importance of children being safe online and impart on parents and carers what systems the school use to filter and monitor online use. They will also be made aware of what their child is being asked to do online via the use of weekly emails.

School related weapons incidents

Teachers have a number of legal powers which include the power to search students without consent for a number of 'prohibited items. These include: knives and weapons; alcohol; illegal drugs and stolen items; tobacco and cigarette papers; fireworks; pornographic images; any article that the member of staff reasonably suspects has been, or is likely to be, used to commit an offence, cause personal injury or damage to property; and any item banned by the school rules that has been identified in these rules as an item that may be searched for searching, screening and confiscation

Cornfields School recognises that children and young people involved in school related weapons incidents, including the alleged instigators, are vulnerable. We will provide support, protection, and education to develop a full understanding of the implications of carrying, and or using, weapons.

