



# SS John Fisher & Thomas More Catholic Primary School Policy: Safeguarding



---

Document Record	
Title	Child Protection & Safeguarding Policy
Date	September 2021
<b>Date considered by Chair of Governors</b>	September 2021
Review Date	September 2022

## Contents

1. Introduction.....	4
2. School Ethos.....	5
3. Aims.....	5
4. Legislation and statutory guidance.....	6
5. Definitions .....	6
6. Equality statement .....	7
Roles and responsibilities .....	8
7. All Staff.....	8
8. Confidentiality .....	10
9. Recognising abuse and taking action .....	10
10. Notifying parents .....	17
11. Pupils with special educational needs and disabilities.....	16
12. Mobile phones, online safety, use of internet and social media .....	18
13. Complaints and concerns about school safeguarding practices .....	18
14. Record-keeping.....	19
15. Training .....	20
17. Teaching Children about Safeguarding.....	20
18. Monitoring arrangements .....	21
19. Links with other policies .....	21
Appendix 1: types of abuse.....	21
Appendix 2: safer recruitment and DBS checks – policy and procedures.....	22
Appendix 3: allegations of abuse made against staff.....	27
Appendix 4: specific safeguarding issues .....	31

## Useful Contacts

### Designated Safeguarding Leads

Mr Dominic Hemington - Headteacher

Ms Catherine Brown – Designated Safeguarding Lead/Parent Support

Ms Claire Sherry – Deputy Headteacher

Mr Tom Silver – Assistant Headteacher

### Contact numbers of other relevant organisations

Multi-Agency Safeguarding Hub (MASH) Helpline: **0161 219 2895**

Manchester Local Authority Contact centre, to refer a child to Social Care: **0161 234 5001**

Early Help Hubs: North 0161 234 1973, Central 0161234 1975, South 0161 234 1977

National Society for the Prevention of Cruelty to Children (NSPCC) advice: **0800 028 0285**

Local Authority (LA) Safeguarding in Education Team: **0161 245 7171**

Manchester Designated Officer (formerly LADO): **0161 234 1214**

NSPCC whistleblowing helpline: **0808 800 5000**

To raise concerns about extremism with respect to a pupil, contact Channel helpline:

**0161 856 6362/6345/6368 or Manchester Prevent and community cohesion co-ordinator**

**Samiya Butt on 0161 234 1489**

Local Authority Designated Officer – see information and follow link below

Complete the referral form found at <https://manchestersafeguardingboards.co.uk/concerned/>

### Link Governor

Mrs Maureen Sweeney – Governor for Safeguarding

### Chair of Governors

Mrs Maureen Sweeney

## 1. Introduction

This policy has been developed to ensure that all adults in SS John Fisher & Thomas More Catholic Primary School are working together to safeguard and promote the welfare of children and young people. This policy is in use following Chair's Action and will be/has been ratified by the Governing Body at a meeting in **Autumn Term 2021** and will be reviewed in **Autumn Term 2022**.

This policy describes the management systems and arrangements in place to create and maintain a safe learning environment for all our children, young people and staff. It identifies actions that should be taken to redress concerns about child safety and welfare including protecting pupils and staff from extremist views, vocal or active, which are opposed to fundamental British values. All opinions and behaviours which are contrary to these fundamental values and the ethos of the school will be vigorously challenged.

Our policy is regularly reviewed and we are responsive to new guidance and legislation and to promoting the safety of our staff and pupils in crisis situations, e.g. Covid-19.

The policy applies to the whole school community, including the Head teacher, Governors, teaching staff, non-teaching staff, volunteers and temporary staff.

Children and young people are vulnerable to abuse in a range of social contexts. **Contextual Safeguarding** is an approach to understanding, and responding to, young people's experiences of significant harm beyond their families. It recognises that the different relationships that young people form in their neighbourhoods, schools and online can feature violence and abuse. Parents and carers have little influence over these contexts, and young people's experiences of extra-familial abuse can undermine parent-child relationships. Consequently, SS John Fisher & Thomas More Catholic Primary School engage with individuals and sectors who do have influence over/within extra-familial contexts, and recognise that assessment of, and intervention with, these spaces are a critical part of safeguarding practices (Firmin 2017).

Pupils and parents are also made aware of the arrangements set out in the policy which is available on the school's website.

The Head teacher, Mr Dominic Hemington or in his absence, the authorised members of staff as listed above, are Designated Safeguarding Lead and have the ultimate responsibility for safeguarding and promoting the welfare of children and young people.

Safeguarding and promoting the welfare of children and young people goes beyond implementing basic child protection procedures. It is an integral part of all activities, functions, culture and ethos of SS John Fisher & Thomas More Catholic Primary School. This policy complements and supports other relevant school and Local Authority policies.

Under the Education Act 2002 schools/settings have a duty to safeguard and promote the welfare of their pupils and, in accordance with guidance set out in '[Working Together to Safeguard Children](#)' (2018) and '[Keeping Children Safe in Education](#)' (2021), SS John Fisher & Thomas More Catholic Primary School will work in partnership with other organisations where appropriate to identify any concerns about child welfare and take action to address this.

Regarding Safer Recruitment we follow: Safer Recruitment Consortium, Guidance for Safer Working Practice, May 2019.

For best practice for online safety we follow, DFE, Teaching Online Safety In Schools, June 2019.

## 2. School Ethos

SS John Fisher & Thomas More Catholic Primary School aims to create and maintain a safe learning environment where all children and adults feel safe, secure and valued and know that they will be listened to and taken seriously.

Our school is committed to the principles outlined in 'Working Together to Safeguard Children' (2018) and implements policies, practices and procedures which promote safeguarding and the emotional and physical wellbeing of children, young people and staff.

The school is committed to the delivery of early help through multi-agency working, a consistent application of the thresholds and the use of a single agency assessment. The Manchester Early Help Strategy is embedded into everyday practice and procedures when responding to children's needs and signposts children and families to appropriate preventative services. We will implement Manchester's Early Help strategy when necessary.

The children have access to appropriate curriculum opportunities, including emotional health and well-being, to support the development of the skills needed to recognise when they are at risk and how to get help when they need it in order to stay safe and healthy, develop their self-esteem and understand the responsibilities of adult life, particularly in regard to child care and parenting skills.

Access to cross-curricular activities will provide opportunities to develop self-esteem and self-motivation and to help pupils respect the rights of others, particularly those groups who may be considered a minority.

SS John Fisher & Thomas More Catholic Primary School will exercise diligence and prevent any organisation or speaker from using the school's facilities to disseminate extremist views or radicalise pupils and staff.

## 3. Aims

Our aim is to do all we can to protect and safeguard the wellbeing of our pupils.

Children and young people have a fundamental right to be protected from harm. Our pupils have the right to expect us to provide them with a safe and secure environment. We acknowledge that staff in our school are in a unique position to identify and to help abused and vulnerable children. We also recognise that the protection of our pupils is a shared community responsibility. **Safeguarding is everyone's responsibility.**

The school aims to ensure that:

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

#### 4. Legislation and statutory guidance

This policy is based on the Department for Education's statutory guidance, [Keeping Children Safe in Education \(2021\)](#), [Working Together to Safeguard Children \(2018\)](#), [Sexual Violence and Sexual Harassment \(2021\)](#), [Royal Assent of the Domestic Abuse Act \(2021\)](#), and the [Governance Handbook](#). We comply with this guidance and the procedures set out by our local safeguarding children board.

This policy is also based on the following legislation:

- Section 175 of the [Education Act 2002](#), which places a duty on schools and local authorities to safeguard and promote the welfare of pupils
- [The School Staffing \(England\) Regulations 2009](#), which set out what must be recorded on the single central record and the requirement for at least one person on a school interview/appointment panel to be trained in safer recruitment techniques. We utilise the [Safer Recruitment Consortium, Guidance for Safer Working Practice, May 2019](#)
- Part 3 of the schedule to the [Education \(Independent School Standards\) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM – Guidance For School June 2019
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- Statutory [guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism
- The [Childcare \(Disqualification\) and Childcare \(Early Years Provision Free of Charge\)\(Extended Entitlement\) \(Amendment\) Regulations 2018](#), (referred to in this policy as the "2018 Childcare Disqualification Regulations") and [Childcare Act 2006](#), which set out who is disqualified from working with children.
- This policy also meets requirements relating to safeguarding and welfare in the [statutory framework for the Early Years Foundation Stage](#).
- Guidance [Coronavirus \(COVID-19\): safeguarding in schools, colleges and other providers](#)

This policy also complies with our funding agreement and articles of association.

#### 5. Definitions

**Safeguarding and promoting the welfare of children** means:

- Protecting children from maltreatment
- Preventing impairment of children's health or development

- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes

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

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

**Peer on peer abuse** is a form of abuse where children abuse other children. It can take many forms and can include (but not limited to): bullying (including cyberbullying); sexual violence and sexual harassment; physical abuse such as hitting, kicking, shaking, biting, hair pulling or otherwise causing physical harm; sexting and initiating/ hazing type violence and rituals.

**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.

**Sexting** (also known as youth produced sexual imagery) is the sharing of sexual imagery (photos or videos) by children.

**Upskirting** this typically involves taking a picture under a person's clothing without them knowing, with the intention of viewing their genitals or buttocks to obtain sexual gratification, or cause the victim humiliation, distress or alarm;

**Children** include everyone under the age of 18.

#### **Definition of Vulnerable Child:**

Based on the definition of Parliament select Committee for Welsh Affairs (2008) "Vulnerable children" means :

- (a) who are unlikely to achieve or maintain, or have the opportunity of achieving or maintaining, a reasonable standard of health or development without the provision for them of social care services,
- (b) whose health or development is likely to be significantly impaired, or further impaired, without the provision for them of social care services,
- (c) who have a physical or mental impairment,
- (d) who are in the care of a public authority, or
- (e) who are provided with accommodation by a public authority in order to secure their well-being.

In addition the term relates to the needs of a diverse range of children: any child in need (including disabled or very sick children), children on the periphery of care, in care, or who have left care. It is drafted so as to include support to parents who may need help for their mental health, substance misuse, learning disability, poverty or other problems that may affect a child's opportunities and wellbeing.

At SS John Fisher & Thomas More Catholic Primary School the definition above is not limited and children may be vulnerable for certain periods of time based on the Contextual Safeguarding needs.

The following **3 safeguarding partners** are identified in the Keeping Children Safe in Education (and defined in the Children Act 2004, as amended by chapter 2 of the Children and Social

Work Act 2017). They will make arrangements to work together to safeguard and promote the welfare of local children, including identifying and responding to their needs:

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

## 6. Equality statement

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

We give special consideration to children who:

- Have special educational needs (SEN) or disabilities (see section 9)
- Are young carers
- May experience discrimination due to their race, ethnicity, religion, gender identification or sexuality
- Have English as an additional language
- Are known to be living in difficult situations – for example, temporary accommodation or where there are issues such as substance abuse or domestic violence
- Are at risk of FGM, sexual exploitation, forced marriage, or radicalisation
- Are asylum seekers
- Are at risk due to either their own or a family member's mental health needs
- Are at risk due to family members in prison
- Are looked after or previously looked after:

The Designated Teacher who is responsible for promoting the educational achievement of children who are looked after is Mrs Angela Tipney. She will work with the Virtual Educational Establishment Head to discuss how available funding can be best used to support the progress of looked after children and meet the need identified in the child's personal education plan. There is a clear requirement of school to safeguard and promote the welfare of **Looked After Children** and **previously Looked After Children** and care leavers.

### 6.1 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 Manchester Safeguarding Children Board (MSCB). Our policy and procedures also apply to extended school and off-site activities.

## 7 All Staff

All staff will read and understand part 1 and Annex A of the Department for Education's statutory safeguarding guidance, [Keeping Children Safe in Education 2021](#), and review this guidance at least annually.

All staff will be aware of:

- Our systems which support safeguarding, including the staff code of conduct, the role and identity of the designated safeguarding lead (DSL and Deputy DSL's), the behaviour policy, and the safeguarding response to children who go missing from education



- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals
- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as child sexual exploitation (CSE), peer on peer abuse, domestic abuse, FGM and radicalisation
- Where children have a social worker, this should inform decisions about safeguarding (for example, responding to unauthorised absence or missing education where there are known safeguarding risks) and about promoting welfare (for example, considering the provision of pastoral and/or academic support, alongside action by statutory services).

Section 13 and appendix 4 of this policy outline in more detail how staff are supported to do this.

## 7.1 The Designated Safeguarding Lead (DSL)

The DSL is a member of the senior leadership team. Our DSL is **Mr Dominic Hemington**, Head teacher. The DSL takes lead responsibility for child protection and wider safeguarding.

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

When the DSL is absent, the following staff will act as cover:

Deputy Designated Safeguarding Lead:

- Catherine Brown

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

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

The Deputy DSL will also keep the Head teacher informed of any issues, and liaise with local authority case managers and designated officers for child protection concerns as appropriate. The full responsibilities of the DSLs are set out in their job description.

## 7.2 The Governing Body

The Governing Body will approve this policy at each review, ensure it complies with the law and hold the Head teacher to account for its implementation.

The Governing Body will appoint a link governor, **Frank Ward** to monitor the effectiveness of this policy in conjunction with the full governing board. This is always a different person from the DSL.

The CEO of the trust, Sacha Humphries will act as the 'case manager' in the event that an allegation of abuse is made against the Head teacher, where appropriate (see appendix 3).

All governors will read Keeping Children Safe in Education.

Section 13 has information on how case managers are supported to fulfil their role.

### 7.3 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 this policy as part of their induction
- Communicating this policy to parents when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training and update this regularly
- Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see appendix 3)
- Ensuring the relevant staffing ratios are met, where applicable
- Making sure each child in the Early Years Foundation Stage is assigned a key person

## 8. Confidentiality

You should note that:

- Timely information sharing is essential to effective safeguarding
- Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
- The Data Protection Act (DPA) 2018 and GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
- If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
- Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
- The government's [information sharing advice for safeguarding practitioners](#) includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
- If staff are in any doubt about sharing information, they should speak to the designated safeguarding lead (or deputies)
- Confidentiality is also addressed in this policy with respect to record-keeping in section 12, and allegations of abuse against staff in appendix 3

## 9. Recognising abuse and taking action

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 DSLs)”

### 9.1 If a child is suffering or likely to suffer from harm, or in immediate danger

Make a referral to children’s social care and/or the police **immediately** if you believe a child is suffering or likely to suffer from harm, or in immediate danger. **Anyone can make a referral.**

Below is the link to Manchester Children’s Services:

<https://www.manchester.gov.uk/homepage/879/childrensservices>

Below is the link which sets out Manchester Children’s Social Care procedures:

[http://www.proceduresonline.com/manchester/cs/chapters/pr\\_contacts.html](http://www.proceduresonline.com/manchester/cs/chapters/pr_contacts.html)

Tell the DSL (see section 7.2) as soon as possible if you make a referral directly.

Below is the link to the GOV.UK webpage for reporting child abuse to your local council:

<https://www.gov.uk/report-child-abuse-to-local-council>

### 9.2 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. Record any questions you have asked (evidence that the child has not been led), record other facts such as body language, emotional presentation e.g. crying
- Sign and date the write-up and pass it on to the DSL. Log the account on CPOMS. Alternatively, if appropriate, make a referral to children’s social care and/or the police directly (see 9.1), and tell the DSL as soon as possible that you have done so

### 9.3 If you discover that FGM has taken place or a pupil is at risk of FGM

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

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

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

**Any teacher who discovers (either through disclosure by the victim or visual evidence) that an act of FGM appears to have been carried out on a pupil under 18 must immediately report this to the police, personally.** This is a statutory duty, and teachers will face disciplinary sanctions for failing to meet it. They should also share concerns with the school safeguarding staff. Teachers can access support in reporting cases of FGM from the safeguarding staff. Concerns must be recorded on CPOMS after sharing the information.

Unless they have good reason not to, they should also discuss the case with the DSL and involve children’s social care as appropriate.

**Any other member of staff** who discovers that an act of FGM appears to have been carried out on a **pupil under 18** must speak to the DSL and follow our local safeguarding procedures. **Any member of staff** who suspects a pupil is *at risk* of FGM, must speak to the DSL or Deputy DSL and follow our local safeguarding procedures.

Below is the link to Greater Manchester Safeguarding Partnership: Female Genital Mutilation Multi-Agency Protocol

[http://greatermanchesterscb.proceduresonline.com/chapter/p\\_fgm.html](http://greatermanchesterscb.proceduresonline.com/chapter/p_fgm.html)

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

Figure 1 on page 12 illustrates the procedure to follow if you have concerns about a child's welfare.

Where possible, speak to the DSL first to agree a course of action.

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0800 028 0285.

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

#### **Early help**

If early help is appropriate, the DSL will support you in liaising with other agencies and setting up an inter-agency assessment as appropriate.

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

#### **Referral**

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

If you make a referral directly (see section 9.1), you must tell the DSL as soon as possible.

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

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

#### **9.5 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).

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

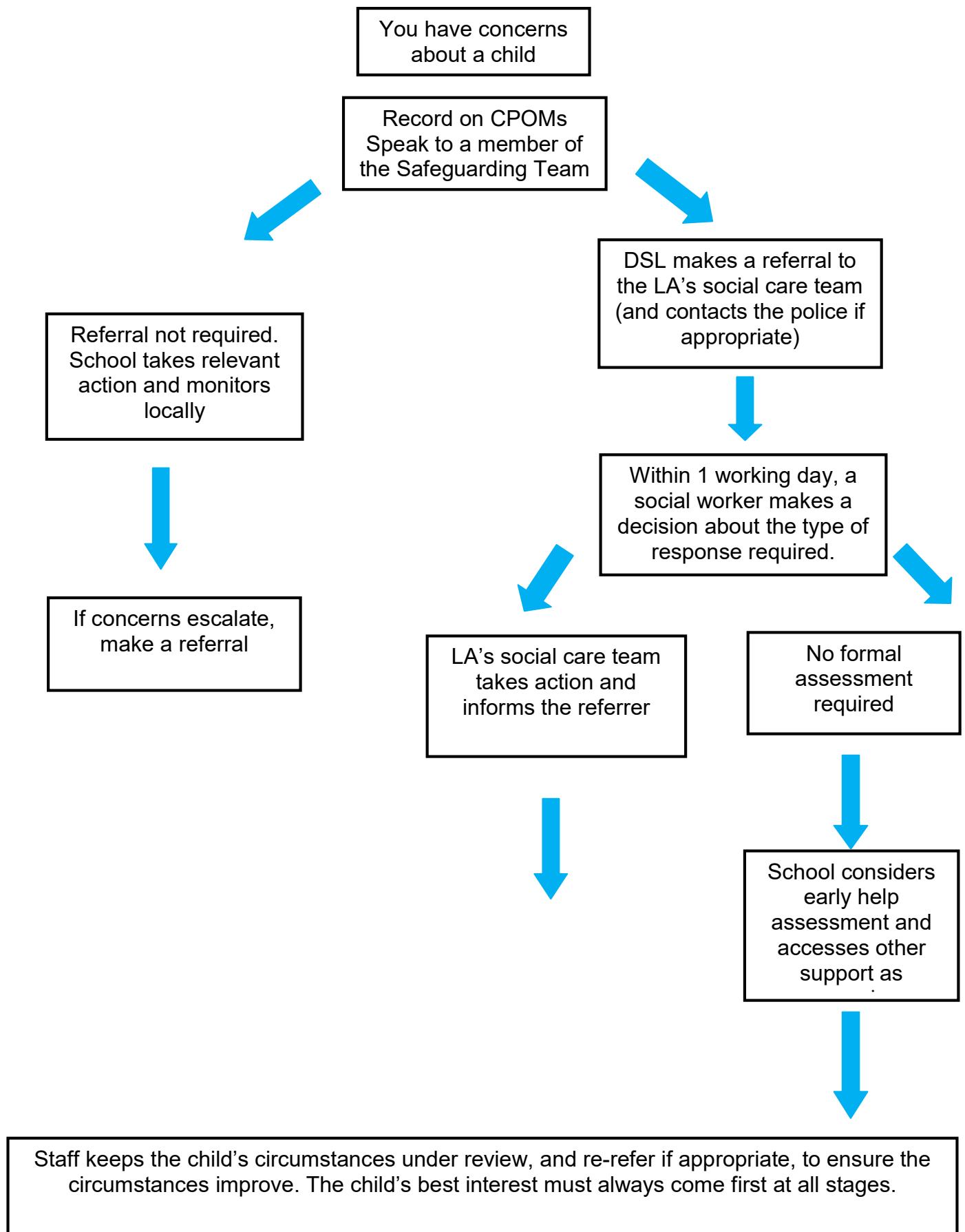
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and governors can call to raise concerns about extremism with respect to a pupil.

You can also email [counter.extremism@education.gov.uk](mailto: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

Figure 1: Procedure if you have concerns about a child's welfare (no immediate danger)



## 9.6 Concerns about a staff member or volunteer

If you have concerns about a member of staff or volunteer, or an allegation is made about a member of staff or volunteer posing a risk of harm to children, **speak to the head teacher**. If the concerns/allegations are about the head teacher, bring this to the attention of the trust: Sacha Humphries (CEO) 0161 499 0000 or Nick Johnson (Chair of Trust Board) 0161 499 0000. The Head teacher/CEO will then follow the procedures set out in appendix 3, if appropriate. Where appropriate, the school will inform Ofsted of the allegation and actions taken, within necessary timescale (see appendix 3 for more detail)

## 9.7 Allegations of abuse made against other pupils

We recognise that children are capable of abusing their peers. Abuse will never be tolerated or passed off as “banter”, “just having a laugh” or “part of growing up”. We also recognise the gendered nature of peer-on-peer abuse (i.e. that it is more likely that girls will be victims and boys perpetrators). All peer-on-peer abuse is unacceptable and will be taken seriously.

For many adults, there can be a separation in their minds between ‘real life’ and the ‘online world.’ This is a dangerous misconception and all staff need to be fully aware and responsive to the serious nature of online peer on peer abuse. Please refer to Appendix 1 and the e safety policy for additional information.

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

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

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

- You must tell a member of the Safeguarding Team and then record the allegation on CPOMs, but do not investigate it
- The DSL will contact the local authority children’s social care team and follow its advice, as well as the police if the allegation involves a potential criminal offence
- The DSL will put a risk assessment and support plan into place for all children involved – both the victim(s) and the child(ren) against whom the allegation has been made – with a named person they can talk to if needed
- The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate

We will minimise the risk of peer-on-peer abuse by:

- Challenging any form of derogatory or sexualised language or behaviour
- Being vigilant to issues that particularly affect different genders – for example, sexualised or aggressive touching or grabbing towards female pupils, and initiation or hazing type violence with respect to boys
- Ensuring our curriculum helps to educate pupils about appropriate behaviour and consent

- Ensuring pupils know they can talk to staff confidentially by regularly updating pupils in assemblies; using pop-ups on the pupils' desk top; promoting the Safeguarding Team around school.
- Ensuring staff are trained to understand that a pupil harming a peer could be a sign that the child is being abused themselves, and that this would fall under the scope of this policy

## 9.8 Sexting

### Your responsibilities when responding to an incident

If you are made aware of an incident involving sexting (also known as 'youth produced sexual imagery'), you must report it to the DSL immediately.

You must **not**:

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

You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL. **Please refer to the e safety policy for additional information regarding online safety.**

### Initial review meeting

Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff. This meeting will consider the initial evidence and aim to determine:

- Whether there is an immediate risk to pupil(s)
- If a referral needs to be made to the police and/or children's social care
- If it is necessary to view the imagery in order to safeguard the young person (in most cases, imagery should not be viewed)
- What further information is required to decide on the best response
- Whether the imagery 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 from devices or online services
- Any relevant facts about the pupils involved which would influence risk assessment
- If there is a need to contact another school, college, setting or individual
- Whether to contact parents or carers of the pupils involved (in most cases parents should be involved)

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

- The incident involves an adult



- There is reason to believe that a young person has been coerced, blackmailed or groomed, or if there are concerns about their capacity to consent (for example owing to special educational needs)
- What the DSL knows about the imagery suggests the content depicts sexual acts which are unusual for the young person's developmental stage, or are violent
- The imagery involves sexual acts and any pupil in the imagery is under 13
- The DSL has reason to believe a pupil is at immediate risk of harm owing to the sharing of the imagery (for example, the young person is presenting as suicidal or self-harming)

If none of the above applies then the DSL, in consultation with the head teacher and other members of staff as appropriate, may decide to respond to the incident without involving the police or children's social care.

### **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.

They will hold interviews with the pupils involved (if appropriate) to establish the facts and assess the risks.

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

### **Informing parents**

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

### **Referring to the police**

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

### **Recording incidents**

All sexting incidents and the decisions made in responding to them will be recorded. The record-keeping arrangements set out in section 12 of this policy also apply to recording incidents of sexting.

### **Curriculum coverage**

Pupils are taught about the issues surrounding sexting as part of our PSHE education at an age appropriate level. All staff are made aware that technology is a significant component in many safeguarding and wellbeing issues and children are at risk of abuse online as well as face to face. Through the PHSE curriculum, pupils are taught about online safety, the use of mobile phones and devices and how abusing others online is still bullying and abuse.

## **10. Notifying parents/carers**

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

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

If we believe that notifying the parents/carers would increase the risk to the child, or may jeopardise a police investigation, 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 of all the children involved.

## **11. Pupils with special educational needs and disabilities**

We recognise that pupils with special educational needs (SEN) and disabilities can face additional safeguarding challenges. Additional barriers can exist when recognising abuse and neglect in this group, including:

- Assumptions that indicators of possible abuse such as behaviour, mood and injury relate to the child's disability without further exploration
- Pupils being more prone to peer group isolation than other pupils
- The potential for pupils with SEN and disabilities being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
- Communication barriers and difficulties in overcoming these barriers

## **12. Mobile phones, online safety including use of the Internet and social media**

### **12.1 Staff**

Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present. Staff members' personal phones will remain in their bags or cupboards during contact time with pupils.

Staff will not take pictures or recordings of pupils on their personal phones or cameras.

We will follow the General Data Protection Regulation and Data Protection Act 2018 when taking and storing photos and recordings for use in the school.

### **12.2 Pupils**

At SS John Fisher & Thomas More Catholic Primary School we recognise that many children will have and use mobile technology. We also understand parents may wish their child to have their phone on them for safety reasons for their journey to and from school. Therefore, we require any child with a phone to hand it in to the class teacher at the start of the school day and retrieve it as they go home. It is also clear that the phone must not be used until they leave school and any phone calls, use of internet and recording is not allowed on the school site.

There are appropriate filtering and monitoring systems in place for online safety. Staff are encouraged to report their concerns if they believe that children are using the internet, mobile technology or social media inappropriately (e.g. sexting or playing on games/apps that are not age appropriate). In some extreme cases the Police may become involved if a child is at risk of exploitation due to their use of the internet or social media. Consequently, staff must report concerns in a timely way so that advice and support can be sought.

## **13. Complaints and concerns about school safeguarding practices**

### **13.1 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).

### **13.2 Other complaints**

Please refer to the school complaints policy.

### **13.3 Whistle-blowing**

It is important that all professionals have the confidence to come forward to speak or act if they are unhappy with anything and that they will be supported by the school to do this.

Whistleblowing occurs when a person raises a concern about dangerous, illegal activity or any wrong doing within the school e.g:

- Potentially vital information about health and safety risks
- Possible fraud
- Harm of children or vulnerable adults
- Concerned or worried about someone's behaviour.

It is essential these issues are addressed immediately, so, 'blowing the whistle' as early as possible is important in order to prevent further harm being done.

Any concerns regarding a member of staff (including volunteers) should be raised with the Head teacher in instances where the member of staff has:

- Behaved in a way that has harmed a child, or may have harmed a child;
- Possibly committed a criminal offence against or related to a child; or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children.
- Behaved or may have behaved in a way that indicates they may not be suitable to work with children due to transferrable risk. Where a member of staff or volunteer is involved in an incident outside of school which did not involve children but could have an impact on their suitability to work with children.

All concerns of poor practice, breach of safer working practices and staff code of conduct or possible child abuse by colleagues must be reported immediately to the Head teacher. Complaints about the Head teacher should be reported to **Sacha Humphries CEO on 0161 499 0000**.

All staff should feel they are able to raise concerns about poor or unsafe practice and potential failure in safeguarding arrangements with the Senior Leadership Team, knowing they will be taken seriously.

However if a staff member feels unable to do this or that their genuine concerns are not being addressed, they can contact The NSPCC whistleblowing by telephoning the helpline on 08000 280285 or email [help@nspcc.org.uk](mailto:help@nspcc.org.uk)

## **14. Record-keeping**

SS John Fisher & Thomas More Catholic Primary School will keep and maintain up to date information on children on the school roll including where and with whom the child is living, attainment, attendance, referrals to and support from other agencies. The school record will also include a chronology of any other significant events in the child's life.

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 on CPOMs. The records must be contemporaneous, descriptive and use respectful language, evidence based, with outcomes. If you are in any doubt about whether to record something, discuss it with the DSL.

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

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

The DSL keeps an up to date and accurate record of all concerns raised by staff. Concerns are recorded on CPOMS which is a confidential and secure online reporting and record keeping software. Chronologies and all associated documents are maintained on CPOMS. A hard copy is kept on the pupil's child protection file which is stored securely at all times and away from the child's main pupil file. The child protection files, both hard copies and electronic, are confidential and are not accessible by pupils, parents or staff. The Safeguarding Team and the Head teacher are the only staff who have access to these records.

A member of the Safeguarding Team will make contact with any school from where a pupil transfers, to specifically request that the school is alerted to any child protection issues relating to a pupil. This is to ensure that records are not lost and concerns are passed on upon transfer between schools. Where no reply has been received from a feeder school, arrangements will be made to confirm if such a file about a child exists.

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

The Data Protection Act 2018, GDPR and human rights law are not barriers to justified information sharing, but provide a framework to ensure that personal information about living individuals is shared appropriately. All staff know that they have a duty to share any concerns they have about a child within a safeguarding context, and should report them immediately to the Safeguarding Team either in person initially or via CPOMs. The following 'golden rules' for information sharing should be followed and are set out in further detail in Information sharing guidance for practitioners (2018):

- GDPR and The Data Protection Act 2018 are not barriers to sharing information
- Be open and honest
- Seek advice
- Share with consent where appropriate
- Consider safety and well-being
- Necessary, proportionate, relevant, accurate, secure and timely
- Keep a record.

In addition:

- Appendix 2 sets out our policy on record-keeping specifically with respect to recruitment and pre-employment checks
- Appendix 3 sets out our policy on record-keeping with respect to allegations of abuse made against staff

## **15. Training**

### **15.1 All staff**

All staff members will be provided with a Staff Code of Conduct and will undertake safeguarding and child protection training at induction. This will include on whistle-blowing procedures, to ensure they understand the school's safeguarding systems and their responsibilities, and can identify signs of possible abuse or neglect. This training will be regularly updated and will be in line with advice from our local safeguarding children board. Staff and volunteers will be made aware of the expectation placed on them to disclose to the Headteacher, any relationships or

associations they may have in school and outside school (including online) that may place a child at risk.

All staff will have training on the government's anti-radicalisation strategy, Prevent, to enable them to identify children at risk of being drawn into terrorism and to challenge extremist ideas. We will further strengthen our safeguarding training through the schools CPD plan via termly twilights.

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

Volunteers will receive appropriate training, if applicable.

### **The use of 'reasonable force'.**

We recognise that there are circumstances when it is appropriate for staff in school to use reasonable force to safeguard children and young people. The term 'reasonable force' covers the broad range of actions used by staff that involve a degree of physical contact to control or restrain children. This can range from guiding a child to safety by the arm, to more extreme circumstances such as breaking up a fight or where a young person needs to be restrained to prevent violence or injury. 'Reasonable' in these circumstances means 'using no more force than is needed'. The use of force may involve either passive physical contact, such as standing between pupils or blocking a pupil's path, or active physical contact such as leading a pupil by the arm out of the classroom.

As a school, we follow a clear physical handling policy and all staff are trained in CPI ( safety intervention) principles. Any guides or holds are recorded and clear information is shared with parents the same day. Keeping Children Safe 2020 states that the adoption of a 'no contact' policy at a school or college can leave staff unable to fully support and protect their pupils and students. Pupils are only held as a very last resort after trained strategies for de-escalation have been adopted. Staff may need to intervene as a last resort to prevent harm to the pupil themselves or to others.

The decision on whether or not to use reasonable force to control or restrain a child is down to the professional judgement of the staff concerned and should always depend on individual circumstances.

When using reasonable force in response to known risks that are assessed (presented by incidents involving children with SEN or disabilities or with medical conditions etc.), we ensure that a number of staff are trained in MAPA principles so that any risk is reduced. This is primarily for the safety of pupils and to reduce the risk for staff. By doing this we are planning positive and proactive behaviour support. Other examples are through drawing up individual behaviour plans for more vulnerable children, and agreeing them with parents and carers, schools and colleges can reduce the occurrence of challenging behaviour and the need to use reasonable force.

### **15.2 The DSL and Deputy DSL**

The Designated Safeguarding Leads will undertake child protection and safeguarding training at least every 2 years.

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

They will also undertake Prevent awareness training.

### **15.3 Governors**

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

As Ss John Fisher & Thomas More is part of a multiacademy trust, the first point of call is to refer to Sacha Humphries in the case that an allegation of abuse is made against the headteacher. Saying that, the chair of governors should still be aware of the procedures in case the need may arise for them to act as the 'case manager.' They receive training in managing allegations for this purpose.

#### **15.4 Recruitment – interview/appointment panels**

At least one person on any interview/appointment panel for a post at the school will have undertaken safer recruitment training. This will cover, as a minimum, the contents of the Department for Education's statutory guidance, Keeping Children Safe in Education, and be in line with local safeguarding procedures.

#### **15.5 Staff who have contact with pupils and families**

All staff who have contact with children and families will have supervisions which will provide them with support, coaching and training, promote the interests of children and allow for confidential discussions of sensitive issues.

### **16. Opportunities to teach safeguarding.**

We ensure that children are taught about safeguarding, including online safety. We consider this as part of providing a broad and balanced curriculum. This includes covering relevant issues through Relationships Education and Relationships and Sex Education (formerly known as Sex and Relationship Education), assemblies and through Personal, Social, Health and Economic (PSHE) education. Government has made regulations and the subjects of Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) is now mandatory from September 2020.

This includes covering relevant issues for schools through Relationships Education (for all primary pupils) and Relationships and Sex Education (for all secondary pupils) and Health Education (for all pupils in state-funded schools) which will be compulsory from September 2020. SS John Fisher & Thomas More have flexibility to decide how we discharge our duties effectively within the first year of compulsory teaching and are taking a phased approach when introducing these subjects. The statutory guidance can be found here: [Statutory guidance: relationships education relationships and sex education \(RSE\) and health education](#). Colleges may cover relevant issues through tutorials. The following resources may help schools and colleges:

- DfE advice for schools: [teaching online safety in schools](#)

### **17. Monitoring arrangements**

This policy will be reviewed annually. At every review, it will be approved by the full governing board.

### **18. Links with other policies**

This policy links to the following policies and procedures:

- Behaviour
- Anti-Bullying
- Staff Code of Conduct

- Complaints
- Health and safety
- Attendance
- E safety
- Physical intervention policy
- Sex and relationship education
- First aid
- SEND
- Lock down and emergency evacuation
- Whistle-blowing Policy

**These appendices are based on the Department for Education's statutory guidance, Keeping Children Safe in Education 2021.**

### **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.

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation. Where children have suffered abuse and neglect, or other potentially traumatic adverse childhood experiences, this can have a lasting impact throughout childhood, adolescence and into adulthood. Should there be any mental health concerns, immediate action should be taken in conjunction with the DSL, the Oasis team and parents (where appropriate).

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

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

Emotional abuse may involve:

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

- 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.

Sexual abuse can take place online and technology can be used to facilitate offline abuse. Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children. The sexual abuse of children by other children is a specific safeguarding issue in education.

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

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

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

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

**Peer on peer abuse**, including peer on peer sexual abuse should be taken very seriously. All staff should be able to reassure victims that they will be supported and kept safe. A victim should never be given the impression that they are creating a problem by reporting abuse, sexual violence or sexual harassment. Nor should a victim ever feel ashamed for making a report. Any suggestions of harmful sexual behaviour should be addressed immediately to help prevent problematic, abusive and/or violent behaviour in the future.

## **Appendix 2: Safer recruitment and DBS checks – policy and procedures**

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

### **Appointing new staff**

When appointing new staff, we will:

- Verify their identity
- Obtain (via the applicant) an enhanced Disclosure and Barring Service (DBS) certificate, including barred list information for those who will be engaging in regulated activity (see definition below). We will not keep a copy of this for longer than 6 months



- Obtain a separate barred list check if they will start work in regulated activity before the DBS certificate is available
- Verify their mental and physical fitness to carry out their work responsibilities
- Verify their right to work in the UK. We will keep a copy of this verification for the duration of the member of staff's employment and for 2 years afterwards
- Verify their professional qualifications, as appropriate
- Ensure they are not subject to a prohibition order if they are employed to be a teacher or involved with teaching activities e.g. unqualified teachers, HLTAs or those who have QTS e.g. volunteer who used to be a teacher
- Carry out further additional checks, as appropriate, on candidates who have lived or worked outside of the UK, including (where relevant) any teacher sanctions or restrictions imposed by a European Economic Area professional regulating authority, and criminal records checks or their equivalent
- Check that candidates taking up a management position, including Trustees and Governors, are not subject to a prohibition from management (section 128) direction made by the secretary of state
- We will ensure that appropriate checks are carried out to ensure that individuals are not disqualified under the 2018 Childcare Disqualification Regulations and Childcare Act 2006. Where we take a decision that an individual falls outside of the scope of these regulations and we do not carry out such checks, we will retain a record of our assessment on the individual's personnel file. This will include our evaluation of any risks and control measures put in place, and any advice sought.
- Ask for written information about previous employment history and check that information is not contradictory or incomplete

We will seek references on all short-listed candidates, including internal candidates, before interview. We will scrutinise these and resolve any concerns before confirming appointments. The references requested will ask specific questions about the suitability of the applicant to work with children.

**Regulated activity** means a person who will be:

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

### **Existing staff**

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

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

- Where the 'harm test' is satisfied in respect of the individual (i.e. that no action or inaction occurred but the present risk that it could was significant)

- Where the individual has received a caution or conviction for a relevant offence, or there is reason to believe that the individual has committed a listed relevant offence, under the [Safeguarding Vulnerable Groups Act 2006 \(Prescribed Criteria and Miscellaneous Provisions\) Regulations 2009](#)
- 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 and details will be recorded on SCR. 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) detail may be recorded on SCR. 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.

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

### **Trainee/student teachers**

Where applicants for initial teacher training are salaried by us, we will ensure that all necessary checks are carried out and details will be placed on SCR.

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

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

### **Volunteers**

We will:

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

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

## **Governors**

- All governors and Trustees will have an enhanced DBS check without barred list information and section 128 checks. Details will be recorded on the SCR.  
They will have an enhanced DBS check with barred list information if working in regulated activity.  
The chair of the board of trustees will have their DBS check countersigned by the secretary of state.  
All trustees, proprietors and local governors will also have the following checks:
  - Identity
  - Right to work in the UK
  - Other checks deemed necessary if they have lived or worked outside the UK

## **Staff working in alternative provision settings**

Where we place a pupil with an alternative provision provider, we obtain written confirmation from the provider that they have carried out the appropriate safeguarding checks on individuals working there that we would otherwise perform.

## **Appendix 3: Allegations of abuse made against staff**

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

- Behaved in a way that has harmed a child, or may have harmed a child, or
- Possibly committed a criminal offence against or related to a child, or
- Behaved towards a child or children in a way that indicates he or she would pose a risk of harm to children

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

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

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

## Suspension

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

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

- Redeployment within the school so that the individual does not have direct contact with the child or children concerned
- Providing an assistant to be present when the individual has contact with children
- Redeploying the individual to alternative work in the school so that they do not have unsupervised access to children
- Moving the child or children to classes where they will not come into contact with the individual, making it clear that this is not a punishment and parents have been consulted
- Temporarily redeploying the individual to another role in a different location, for example to an alternative school or other work for the multi-academy trust.

## Definitions for outcomes of allegation investigations

- **Substantiated:** there is sufficient evidence to prove the allegation
- **Malicious:** there is sufficient evidence to disprove the allegation and there has been a deliberate act to deceive
- **False:** there is sufficient evidence to disprove the allegation
- **Unsubstantiated:** there is insufficient evidence to either prove or disprove the allegation (this does not imply guilt or innocence)
- **Unfounded:** to reflect cases where there is no evidence or proper basis which supports the allegation being made

## Procedure for dealing with allegations

In the event of an allegation that meets the criteria above, the Head teacher (or CEO where the Head teacher is the subject of the allegation) – the ‘case manager’ – will take the following steps:

- Immediately discuss the allegation with the designated officer at the local authority. This is to consider the nature, content and context of the allegation and agree a course of action, including whether further enquiries are necessary to enable a decision on how to proceed, and whether it is necessary to involve the police and/or children’s social care services. (The case manager may, on occasion, consider it necessary to involve the police *before* consulting the designated officer – for example, if the accused individual is deemed to be an immediate risk to children or there is evidence of a possible criminal offence. In such cases, the case manager will notify the designated officer as soon as practicably possible after contacting the police)
- Inform the accused individual of the concerns or allegations and likely course of action as soon as possible after speaking to the designated officer (and the police or children’s social care services, where necessary). Where the police and/or children’s social care services are involved, the case manager will only share such information with the individual as has been agreed with those agencies

- Where appropriate (in the circumstances described above), carefully consider whether suspension of the individual from contact with children at the school is justified or whether alternative arrangements such as those outlined above can be put in place. Advice will be sought from the designated officer, police and/or children's social care services, as appropriate
- **If immediate suspension is considered necessary**, agree and record the rationale for this with the designated officer. The record will include information about the alternatives to suspension that have been considered, and why they were rejected. Written confirmation of the suspension will be provided to the individual facing the allegation or concern within 1 working day, and the individual will be given a named contact at the school and their contact details
- **If it is decided that no further action is to be taken** in regard to the subject of the allegation or concern, record this decision and the justification for it and agree with the designated officer what information should be put in writing to the individual and by whom, as well as what action should follow both in respect of the individual and those who made the initial allegation
- **If it is decided that further action is needed**, take steps as agreed with the designated officer to initiate the appropriate action in school and/or liaise with the police and/or children's social care services as appropriate
- Provide effective support for the individual facing the allegation or concern, including appointing a named representative to keep them informed of the progress of the case and consider what other support is appropriate.
- 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 on-going. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice
- Keep the parents or carers of the child/children involved informed of the progress of the case and the outcome, where there is not a criminal prosecution, including the outcome of any disciplinary process (in confidence)
- 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
- We will inform Ofsted of any allegations of serious harm or abuse by any person living, working, or looking after children at the premises (whether the allegations relate to harm or abuse committed on the premises or elsewhere), and any action taken in respect of the allegations. This notification will be made as soon as reasonably possible and always within 14 days of the allegations being made.

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

Where the police are involved, wherever possible the academy trust will ask the police at the start of the investigation to obtain consent from the individuals involved to share their

statements and evidence for use in the school's disciplinary process, should this be required at a later point.

### **Timescales**

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

### **Specific Actions**

#### **Action following a criminal investigation or prosecution**

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

#### **Conclusion of a case where the allegation is substantiated**

If the allegation is substantiated and the individual is dismissed or the school ceases to use their services, or the individual resigns or otherwise ceases to provide their services, the case manager and the school's personnel adviser will discuss with the designated officer whether to make a referral to the DBS for consideration of whether inclusion on the barred lists is required. If the individual concerned is a member of teaching staff, the case manager and personnel adviser will discuss with the designated officer whether to refer the matter to the NCTL 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 or malicious allegations**

If an allegation is shown to be deliberately invented, or malicious, the Head teacher, or other appropriate person in the case of an allegation against the Head teacher, will consider whether any disciplinary action is appropriate against the pupil(s) who made it, or whether the police should be asked to consider whether action against those who made the allegation might be appropriate, even if they are not a pupil.

#### **Confidentiality**

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

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

- Who needs to know about the allegation and what information can be shared
- How to manage speculation, leaks and gossip, including how to make parents or carers of a child/children involved aware of their obligations with respect to confidentiality
- What, if any, information can be reasonably given to the wider community to reduce speculation

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

### **Record-keeping**

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

- A clear and comprehensive summary of the allegation
- Details of how the allegation was followed up and resolved
- Notes of any action taken and decisions reached (and justification for these, as stated above)

If an allegation or concern is not found to have been malicious, the school will retain the records of the case on the individual's confidential personnel file, and provide a copy to the individual.

Where records contain information about allegations of sexual abuse, we will preserve these for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry. We will retain all other records at least until the individual has reached normal pension age, or for 10 years from the date of the allegation if that is longer.

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

### **References**

When providing employer references, we will not refer to any allegation that has been proven to be false, unsubstantiated or malicious or any history of allegations where all such allegations have been proven to be false, unsubstantiated or malicious.

### **Learning lessons**

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

This will include consideration of (as applicable):

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

## **Appendix 4: Specific safeguarding issues**

### **Children missing from education and non-attendance at school**

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

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

- Are at risk of harm or neglect
- 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 as detailed in SS John Fisher & Thomas More Policy for Attendance and Punctuality for unauthorised absence and for dealing with children who go missing from education, particularly on repeat occasions, to help identify the risk of abuse and neglect, including sexual exploitation, and to help prevent the risks of going missing in future. This includes informing the local authority if a child leaves the school without a new school being named, and adhering to requirements with respect to sharing information with the local authority, when applicable, when removing a child's name from the admission register at non-standard transition points.

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

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

### **Elective Home Education**

Following the lockdown procedures for COVID 19, there may be a rise in elective home education. Whilst many home educated children have an overwhelmingly positive learning experience, some children are less visible to the services that are there to keep them safe and supported in line with their needs. Where a parent/ carer has expressed their intention to remove a child from school, coordination with professionals is key. This is particularly important where a child has SEND, is vulnerable and/or has a social worker.

### **Child Sexual Exploitation**

Child sexual exploitation (CSE) is a form of sexual abuse where children are sexually exploited for money, power or status.

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

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

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

Indicators of sexual exploitation can include a child:

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



- Misusing drugs and/or alcohol
- Going missing for periods of time, or regularly coming home late
- Regularly missing school or education, or not taking part in education

### **Child Criminal Exploitation; County Lines**

Criminal exploitation of children is a geographically widespread form of harm that is a typical feature of county lines criminal activity: drug networks or gangs groom and exploit children and young people to carry drugs and money from urban areas to suburban and rural areas, market and seaside towns. Key to identifying potential involvement in county lines are missing episodes, when the victim may have been trafficked for the purpose of transporting drugs and a referral to the National Referral Mechanism should be considered. Like other forms of abuse and exploitation, county lines exploitation:

- can affect any child or young person (male or female) under the age of 18 years;
- can affect any vulnerable adult over the age of 18 years;
- can still be exploitation even if the activity appears consensual;
- can involve force and/or enticement-based methods of compliance and is often accompanied by violence or threats of violence;
- can be perpetrated by individuals or groups, males or females, and young people or adults; and
- is typified by some form of power imbalance in favour of those perpetrating the exploitation. Whilst age may be the most obvious, this power imbalance can also be due to a range of other factors including gender, cognitive ability, physical strength, status, and access to economic or other resources.

### **Indicators of Serious Violent Crime**

All staff should be aware of indicators, which may signal that children are at risk from, or are involved with serious violent crime. These may include increased absence from school, a change in friendships or relationships with older individuals or groups, a significant decline in performance, signs of self-harm or a significant change in wellbeing, or signs of assault or unexplained injuries. Unexplained gifts or new possessions could also indicate that children have been approached by, or are involved with, individuals associated with criminal networks or gangs.

All staff should be aware of the associated risks and understand the measures in place to manage these. *Advice for schools and colleges is provided in the Home Office's Preventing youth violence and gang involvement and its Criminal exploitation of children and vulnerable adults: county lines guidance.*

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

Indicators that FGM has already occurred include:

- A pupil confiding in a professional that FGM has taken place
- A mother/family member disclosing that FGM has been carried out

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

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

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

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

### **Homelessness**

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

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

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

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

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

### **Forced marriage**

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

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

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

The DSL will:

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

### **Preventing radicalisation**

Radicalisation refers to the process by which a person comes to support terrorism and forms of extremism. Extremism is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs.

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

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

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

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

Staff will be alert to changes in pupils' behaviour.

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

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

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

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

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

Further information on the school's measures to prevent radicalisation are set out in other school policies and procedures, including our behaviour policy and e-safety policy.

### **Checking the identity and suitability of visitors.**

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

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

Visitors are expected to sign in and wear a visitor's badge.

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

- Will be asked to show their DBS certificate, which will be checked alongside their photo ID; or
- The organisation sending the professional, such as the LA or educational psychology service, will provide prior written confirmation that an enhanced DBS check with barred list information has been carried out

All other visitors, including visiting speakers, will be accompanied by a member of staff at all times. We will not invite into the school any speaker who is known to disseminate extremist

views, and will carry out appropriate checks to ensure that any individual or organisation using school facilities is not seeking to disseminate extremist views or radicalise pupils or staff.

### **Non-collection of children**

If a child is not collected at the end of the session/day, we will:

- Contact parents and other known contacts held on SIMs

### **Contact Details.**

At SS John Fisher & Thomas More Catholic Primary School we ask for two separate contact details for parents. Guidance is that where reasonable school should hold more than one emergency contact number for each pupil or student. This goes beyond the legal minimum and is good practice to give the school additional options to make contact with a responsible adult when a child missing education is also identified as a welfare and/or safeguarding concern.

- Supervise the children in our reception area until 4:00pm (a member of the Senior Leadership Team will supervise and Children Services may be contacted).
- Record the reason for non-collection on CPOMs