# Safeguarding and Child Protection Policy and Procedures

| Approved by: | GFM Board | Date: | 16 December 2021 |
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| Maintained by: | Kirstie Andrew-Power | Next review due: | December 2022 |

To be greater and to aspire further

## Important safeguarding contacts

| Designated safeguarding leads | Primary Phase:<br>● Karen Digby kdigby@gomer.gfmat.org<br>● Kerry Sharpe ksharpe@rowner.gfmat.org<br>Secondary Phase:<br>● Steve Kitchen skitchen@gfmat.org |
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| Executive safeguarding leads | Primary:<br>● Georgina Mulhall gmulhall@gfmat.org<br>Secondary:<br>● Chris Willis cwillis@gfmat.org<br>● Ryan Peet rpeet@gfmat.org<br>GFM:<br>● Kirstie Andrew-Power kandrew-power@gfmat.org |
| Designated safeguarding Trustee | Jean Morgan jmorgan@board.gfmat.org |
| Chair of the MAT Board | Cris Beswick cbeswick@board.gfmat.org |
| Local authority designated officer (LADO) | Barabara Piddington barbara.piddington@hants.gov.uk |

## 1. Aims

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

## 2. Legislation and statutory guidance

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

● Research on the use of Part 4 of Keeping Children Safe In Education guidance Research report February 2020 https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/fil e/867935/KCSIE_part_4_research_report.pdf

- Part 3 of the schedule to the [Education (Independent School Standards) Regulations 2014](#), which places a duty on academies and independent schools to safeguard and promote the welfare of pupils at the school
- [The Children Act 1989](#) (and [2004 amendment](#)), which provides a framework for the care and protection of children
- Section 5B(11) of the Female Genital Mutilation Act 2003, as inserted by section 74 of the [Serious Crime Act 2015](#), which places a statutory duty on teachers to report to the police where they discover that female genital mutilation (FGM) appears to have been carried out on a girl under 18
- [Statutory guidance on FGM](#), which sets out responsibilities with regards to safeguarding and supporting girls affected by FGM
- [The Rehabilitation of Offenders Act 1974](#), which outlines when people with criminal convictions can work with children
- Schedule 4 of the [Safeguarding Vulnerable Groups Act 2006](#), which defines what 'regulated activity' is in relation to children
- [Statutory guidance on the Prevent duty](#), which explains schools' duties under the Counter-Terrorism and Security Act 2015 with respect to protecting people from the risk of radicalisation and extremism

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

## 3. Definitions

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

- Protecting children from maltreatment
- Preventing impairment of children's mental and physical health or development
- Ensuring that children grow up in circumstances consistent with the provision of safe and effective care
- Taking action to enable all children to have the best outcomes
- **Child protection** is part of this definition and refers to activities undertaken to prevent children suffering, or being likely to suffer, significant harm.

**Abuse** is a form of maltreatment of a child, and may involve inflicting harm or failing to act to prevent harm.
See [Appendix 1](#) for different types of abuse and/or refer to KCSIE.

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

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

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

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

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

# 4. Roles and responsibilities

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

## 4.1 All staff

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

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

All staff will be aware of:

- The range of policies and systems which support safeguarding
- The role the school formal and informal curriculum plays in supporting and enabling children and young people to keep themselves safe.
- Safer recruitment policy and practices including the SCR, approved visitor registers and Visitor Protocols.
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- The early help process (sometimes known as the common assessment framework) and their role in it, including identifying emerging problems, liaising with the DSL, and sharing information with other professionals to support early identification and assessment
- The process for making referrals to local authority children's social care and for statutory assessments that may follow a referral, including the role they might be expected to play
- What to do if they identify a safeguarding issue or a child tells them they are being abused or neglected, including specific issues such as FGM, and how to maintain an appropriate level of confidentiality while liaising with relevant professionals

- The signs of different types of abuse and neglect, as well as specific safeguarding issues, such as peer-on-peer abuse, child sexual exploitation (CSE), child criminal exploitation (CCE), indicators of being at risk from or involved with serious violent crime, FGM and radicalisation
- The importance of reassuring victims that they are being taken seriously and that they will be supported and kept safe

## 4.2 The designated safeguarding lead (DSL)

Each GFM school has a named DSL who takes lead responsibility for child protection and wider safeguarding in the school. Each DSL is supported by a member of the Executive linked to the school, and with executive accountabilities for safeguarding. The team of DSLs and Executive are further supported by the named safeguarding Trustee.

During term time, the DSL in each school will be available during school hours for staff to discuss any safeguarding concerns, supported by their Executive link.

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**Gomer Junior School**

- DSL Georgina Mulhall can be contacted via email gmulhall@gfmat.org or by phone on 02392524312
- Deputy DSL: Karen Digby or Vicky Wilden
- If the DSL and deputies are not available, Kerry Payne (Executive Leader) will act as cover (for example, during out-of-hours/out-of-term activities).

**Rowner Junior School**

- DSL Kerry Sharpe can be contacted via email ksharpe@rowner.gfmat.org or by phone on 02392524312
- Deputy DSL: Georgina Mulhall and Emily Weaver

**Bay House School and Brune Park School**

- Steve Kitchen can be contacted via email skitchen@gfmat.org or by phone on 02392616000 (Brune Park) and 02392587931 (Bay House).
- When the DSL is absent, the deputies Karen O'Byrne, Kate Taylor Waterson, Tom Andrew Power and Lizzie Tanner will act as cover.
- If the DSL and deputies are not available, Chris Willis or Ryan Peet (Executive Leads) will act as cover (for example, during out-of-hours/out-of-term activities).

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The DSL and deputies are given the time, funding, training, resources and support to:

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

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

## 4.3 The GFM (MAT) Executive and Board

The GFM Executive and Board will:

- Facilitate a Trust wide, phase specific, schools site specific and GFM building approach to safeguarding, ensuring that safeguarding and child protection are at the forefront and underpin all relevant aspects of process and policy development
- Evaluate and approve this policy at each review, ensuring it complies with the law, and hold the School's Executive to account for its implementation at Trust, phase and school level
- Appoint a Trustee with responsibility for safeguarding to monitor the effectiveness of this policy in conjunction with the full MAT board. This is always a different person from the DSL
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- The Designated Trustee will act as the 'case manager' in the event that an allegation of abuse is made against the School's Executive/schools executive, where appropriate (see Appendix 3).

All members of the Board and Trustees will read Keeping Children Safe in Education. Section 15 of this policy has information on how Trustees are supported to fulfil their role.

## 4.4 The School's Executive

The School's Executive is responsible for the implementation of this policy, including:
- Ensuring that staff (including temporary staff) and volunteers:
  ○ Are informed of our systems which support safeguarding, including this policy, as part of their induction
  ○ Understand and follow the procedures included in this policy, particularly those concerning referrals of cases of suspected abuse and neglect
- Communicating this policy to parents/carers when their child joins the school and via the school website
- Ensuring that the DSL has appropriate time, funding, training and resources, and that there is always adequate cover if the DSL is absent
- Ensuring that all staff undertake appropriate safeguarding and child protection training, and updating the content of the training regularly

● Acting as the 'case manager' in the event of an allegation of abuse made against another member of staff or volunteer, where appropriate (see Appendix 3)

# 5. Confidentiality

The GFM's approach to confidentiality and data protection is covered in the Data Protection Policy and Privacy Notice, which outlines our processes and principles for sharing information within our Trust, and with the 3 safeguarding partners and other agencies as required.

Broadly, the document adheres to the following guidance:

● Fears about sharing information must not be allowed to stand in the way of the need to promote the welfare, and protect the safety, of children
● The Data Protection Act (DPA) 2018 and UK GDPR do not prevent, or limit, the sharing of information for the purposes of keeping children safe
● If staff need to share 'special category personal data', the DPA 2018 contains 'safeguarding of children and individuals at risk' as a processing condition that allows practitioners to share information without consent if it is not possible to gain consent, it cannot be reasonably expected that a practitioner gains consent, or if to gain consent would place a child at risk
● Staff should never promise a child that they will not tell anyone about a report of abuse, as this may not be in the child's best interests
● The government's information sharing advice for safeguarding practitioners includes 7 'golden rules' for sharing information, and will support staff who have to make decisions about sharing information
● If staff are in any doubt about sharing information, they should speak to the DSL or one of the safeguarding team
● Confidentiality is also addressed in this policy with respect to record-keeping in section 14, and allegations of abuse against staff in Appendix 3.

# 6. Recognising abuse and taking action

Staff, volunteers and Trustees 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 and/or one of the designated safeguarding team".

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

If you believe a child is suffering or likely to suffer from harm, or in immediate danger, refer your concerns to the DSL or safeguarding team immediately to ensure that they can make a referral to children's social care and/or the police.
Anyone can make a referral, however we strongly advise this is done through the safeguarding team. If staff need to act immediately, they will tell the DSL as soon as possible.

**The DSL will consider the best course of action for the situation and will take advice from [When to call the Police](#) in cases that require external support.**

Local procedures for making a referral, as per the arrangements put in place by the 3 safeguarding partners, are available here:

- [https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/childprotection/mash](https://www.hants.gov.uk/socialcareandhealth/childrenandfamilies/safeguardingchildren/childprotection/mash)
- [https://www.gov.uk/report-child-abuse-to-local-council](https://www.gov.uk/report-child-abuse-to-local-council)

### 6.2 If a child makes a disclosure to you

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

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

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

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

**Any member of staff who either:**

- Is informed by a girl under 18 that an act of FGM has been carried out on her; or

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

Must immediately report this to the police, personally. This is a mandatory statutory duty.

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

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

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

**Any member of staff** who suspects a pupil is at risk of FGM or suspects that FGM has been carried out or discovers that a pupil **aged 18 or over** appears to have been a victim of FGM, must speak to the DSL and follow our local safeguarding procedures.

## 6.4 If you have concerns about a child (as opposed to believing a child is suffering or likely to suffer from harm, or is in immediate danger)

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

If in exceptional circumstances the DSL is not available, this should not delay appropriate action being taken. Speak to a member of the senior leadership team and/or take advice from local authority children's social care. You can also seek advice at any time from the NSPCC helpline on 0808 800 5000. Share details of any actions you take with the DSL as soon as practically possible.

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

### *Early help*

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

The Hampshire Early Help model

## Referral

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

If you make a referral directly, you must tell the DSL as soon as possible.

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

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

In the GFM, all referrals are managed through the trained DSL.

## 6.5 If you have concerns about extremism

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

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

Where there is a concern, the DSL will consider the level of risk and decide which agency to make a referral to. This could include Channel, the government's programme for identifying and supporting individuals at risk of being drawn into terrorism, or the local authority children's social care team.
The Department for Education also has a dedicated telephone helpline, 020 7340 7264, which school staff and Trustees can call to raise concerns about extremism with respect to a pupil. You can also email counter.extremism@education.gov.uk. Note that this is not for use in emergency situations.

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

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

## 6.6 If you have a mental health concern

Mental health problems can, in some cases, be an indicator that a child has suffered or is at risk of suffering abuse, neglect or exploitation.
Staff will be alert to behavioural signs that suggest a child may be experiencing a mental health problem or be at risk of developing one.

If you have a mental health concern about a child that is also a safeguarding concern, take immediate action by following the steps in section 7.4.
If you have a mental health concern that is not also a safeguarding concern, speak to the team of safeguarding leads to decide upon a course of action.

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**Primary Phase**
Specific training on 'spotting the signs' around mental health has been provided to staff. Specific training and support is provided given the unique situation children and families face post lockdown and as a result of the global pandemic and the potential additional impact on a person's mental health. We use ImpactEd to help monitor individuals.

We have measures in place to support learners with their mental health. These range from in-house assemblies, PSHE curriculum learning, nurture sessions and ELSA to CAMHS and other agency. We also refer directly to CAMHS when appropriate.

**Secondary Phase GFM Schools**

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Specific training on 'spotting the signs' around mental health has been provided to staff. Specific training and support is provided given the unique situation children and families face post lockdown and as a result of the global pandemic and the potential additional impact on a person's mental health.

We have measures in place to support learners with their mental health. These range from apps and online resources from CAMHS and other agencies, assemblies and curriculum content, face to face intervention from our ELSA team and MHST referral process. We also refer directly to CAMHS when appropriate.

## 6.7 Concerns about a staff member, approved visitor, volunteer or contractor

If you have concerns about a member of staff (including approved visitors, volunteer or contractor), or an allegation is made about a member of staff (including approved visitors, volunteer or contractor) posing a risk of harm to children, speak to the School's Executive as soon as possible. If the concerns/allegations are about the School's Executive, speak to the CEO and/or the nominated safeguarding Trustee.

If the concerns/allegations are about a member of the Executive, or the CEO, speak to the nominated safeguarding Trustee: Jean Morgan.

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

If your concerns are defined as 'low level' ie: not meeting the harm threshold outlined in KCSIE Part 4 para 338, this does not mean that it is insignificant and must still be reported to the DSL or a member of Executive.

The DSL, Executive or Trustee will then follow the procedures set out in KCSIE as appropriate.

### *What is a low level concern?*

A low-level concern is any concern – no matter how small, and even if no more than causing a sense of unease or a 'nagging doubt' - that an adult working in or on behalf of the GFM may have acted in a way that:

● is inconsistent with the staff code of conduct, including inappropriate conduct outside of work; and
● does not meet the allegations threshold or is otherwise not considered serious enough to consider a referral to the LADO.

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

● being over friendly with children;

- having favourites;
- taking photographs of children on their mobile phone;
- engaging with a child on a one-to-one basis in a secluded area or behind a closed door; or,
- using inappropriate sexualised, intimidating or offensive language.

Such behaviour can exist on a wide spectrum, from the inadvertent or thoughtless, or behaviour that may look to be inappropriate, but might not be in specific circumstances, through to that which is ultimately intended to enable abuse.

## *Clarity around Allegation vs Low-Level Concern vs Appropriate Conduct*

Allegation
Behaviour which indicated that an adult who works with children 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;
- behaved towards a child or children in a way that indicates they may post a risk of harm to children.

Low-level concern
- Any concern - no matter how small, even if it is no more than a 'nagging doubt' that an adult may have acted in a manner which:
- is not consistent with the GFM Code of Conduct and/or
- relates to their conduct outside of work, even if not linked to a particular act or omission, has caused a sense of unease about that adult's suitability to work with children.

Appropriate conduct is entirely consistent with the Law and the GFM Code of Conduct.

## 6.8 Allegations of abuse made against other pupils

**GFM schools set out to create supportive environments in school to minimise the risk of peer-on-peer abuse.**

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

**Primary Phase**
We believe that all children have a right to attend school and learn in a safe environment. Children should be free from harm by adults in the school and other children. We recognise that children are

capable of abusing their peers and this will be dealt with. We are clear that sexual violence and sexual harassment is not acceptable, will never be tolerated and is not an inevitable part of growing up.

**Prevention**
● 	Taking a whole school approach to safeguarding & child protection
● 	Providing training to staff
● 	Providing a clear set of values and standards, underpinned by the school's behaviour policy and pastoral support system, and by a planned programme of evidence based content delivered through the curriculum.
● 	Engaging with specialist support and interventions

**Responding to reports of sexual violence and sexual harassment:**
● 	Children making a report of sexual violence or sexual harassment will be taken seriously, kept safe and be well supported.
● 	If the report includes an online element staff will be mindful of the Searching, Screening and Confiscation: advice for schools) guidance.
● 	Staff taking the report will inform the DSL or their Deputy as soon as practicably possible but at least within 24 hours. Staff taking a report will never promise confidentiality. Parents or carers will normally be informed (unless this would put the child at greater risk).
● 	If a child is at risk of harm, is in immediate danger, or has been harmed, a referral will be made to Children's Social Care.

**Action: The DSL will consider:-**
● 	The wishes of the victim.
● 	The nature of the incident, including whether a crime has been committed and the harm caused.
● 	Ages of the children involved.
● 	Developmental stages of the children.
● 	Any power imbalance between the children.
● 	Any previous incidents.
● 	Ongoing risks.
● 	Other related issues or wider context.

**The DSL will manage the report with the following options:-**
● 	Manage internally
● 	Early Help
● 	Refer to Children's Social Care
● 	Report to the police (generally in parallel with a referral to Social Care)

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

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

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

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

See Appendix 4 for more information about peer-on-peer abuse.

**Procedures for dealing with allegations of peer-on-peer abuse**

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

● You must record the allegation and tell one of the safeguarding team, but do not investigate it
● The Safeguarding team along with the DSL will assess the context and take the appropriate action. This maybe contacting 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 with the appropriate staff agree support and action with and for the victim and if necessary their family.
● The DSL with appropriate staff will agree an educative approach and appropriate action for the perpetrator and their family (in almost all cases) and this includes follow up .
● The DSL will contact the children and adolescent mental health services (CAMHS), if appropriate.
● Our peer on peer abuse initiative seeks to recognise the difference between acts of unkindness, banter and bullying. This is achieved by asking staff, when dealing with these situations, to follow up with a written record of the incident. This allows for the pastoral and safeguarding team to have an oversight of the behaviours and can identify patterns of behaviour that can be a 'one off', or appear targeted and repetitive by either the perpetrator or the victim. This helps us distinguish between what is bullying, banter and unkindness and most importantly allows us to support those pupils who most need support whilst dealing with those whose behaviours need to be challenged.

To minimise the risk of peer-on-peer abuse as a phase we:

● Challenge any form of derogatory or sexualised language or inappropriate behaviour between peers, including requesting or sending sexual images and recognise this is an ongoing training need for staff and pupils

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

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

● Ensure pupils are able to easily and confidently report abuse using our reporting systems

● Ensure staff reassure victims that they are being taken seriously

● Ensure staff are trained to understand:

o How to recognise the indicators and signs of peer-on-peer abuse, and know how to identify it and respond to reports

o That even if there are no reports of peer-on-peer abuse in school, it does not mean it is not happening – staff should maintain an attitude of "it could happen here"

> o    That if they have any concerns about a child's welfare, they should act on them immediately rather than wait to be told, and that victims may not always make a direct report. For example:
> ▪    Children can show signs or act in ways they hope adults will notice and react to
> ▪    A friend may make a report
> ▪    A member of staff may overhear a conversation
> ▪    A child's behaviour might indicate that something is wrong
> o    That certain children may face additional barriers to telling someone because of their vulnerability, disability, gender, ethnicity and/or sexual orientation
> o    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
> o    The important role they have to play in preventing peer-on-peer abuse and responding where they believe a child may be at risk from it
> o    That they should speak to the Safeguarding team if they have any concerns

## 6.9 Sharing of nudes and semi-nudes ('sexting')

Staff across the GFM are training to be aware of, and manage incidents where there are concerns that 'sexting' has taken place.

> If staff are made aware of an incident involving the consensual or non-consensual sharing of nude or semi-nude images/videos (also known as 'sexting' or 'youth produced sexual imagery'), they must report it to the DSL immediately.
>
> Staff must not:
>
> ●    View, copy, print, share, store or save the imagery yourself, or ask a pupil to share or download it (if you have already viewed the imagery by accident, you must report this to the DSL)
> ●    Delete the imagery or ask the pupil to delete it
> ●    Ask the pupil(s) who are involved in the incident to disclose information regarding the imagery (this is the DSL's responsibility)
> ●    Share information about the incident with other members of staff, the pupil(s) it involves or their or other, parents and/or carers
> ●    Say or do anything to blame or shame any young people involved
>
> You should explain that you need to report the incident, and reassure the pupil(s) that they will receive support and help from the DSL.
>
> **Initial review meeting**
>
> Following a report of an incident, the DSL will hold an initial review meeting with appropriate school staff – this may include the staff member who reported the incident and the safeguarding or leadership team

that deals with safeguarding concerns. This meeting will consider the initial evidence and aim to determine:

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

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

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

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

**Further review by the DSL**

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

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

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

**Informing parents/carers**

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

**Referring to the police**

If it is necessary to refer an incident to the police, this will be done through contacting the police community support officer, dialling 101 or dialing 999 depending on the severity of the incident.

**Recording incidents**

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

**Curriculum coverage**

Pupils are taught about the issues surrounding the sharing of nudes and semi-nudes as part of our PSHRE and computing programmes. Teaching covers the following in relation to the sharing of nudes and semi-nudes:

● What it is
● How it is most likely to be encountered
● The consequences of requesting, forwarding or providing such images, including when it is and is not abusive and when it may be deemed as online sexual harassment
● Issues of legality
● The risk of damage to people's feelings and reputation

Pupils also learn the strategies and skills needed to manage:
● Specific requests or pressure to provide (or forward) such images
● The receipt of such images

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

## 6.10 Reporting systems for our pupils

Where there is a safeguarding concern, we will take the child's wishes and feelings into account when determining what action to take and what services to provide.
We recognise the importance of ensuring pupils feel safe and comfortable to come forward and report any concerns and/or allegations.

To achieve this, we will:

- Put systems in place for pupils to confidently report abuse
- Ensure our reporting systems are well promoted, easily understood and easily accessible for pupils
- Make it clear to pupils that their concerns will be taken seriously, and that they can safely express their views and give feedback
- Pupils can report safeguarding concerns in a number of ways. They can self-report using the pupil intranet where they have the option to report acts of unkindness and personal worries that they might have or concerns about their peers. Pupils have the opportunity to attend support sessions called a 'listening ear' that are run by our ELSA team alongside year group lunch groups, young carers groups and our school pastors. Pupils can also talk to their tutor or any member of staff who will then share the concerns using the safeguarding disclosure forms..
- Pupils are made aware of these systems via assemblies, the tutor programme and the PSHRE curriculum.
- Pupils will not be promised confidentiality, staff will reassure children that they are being taken seriously and will be supported. Children and young people should never be made to feel ashamed or that they are creating a problem by reporting abuse

# 7. Online safety and the use of mobile technology

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

To address this, our school aims to:

- Have robust processes in place to ensure the online safety of pupils, staff, volunteers and Trustees
- Protect and educate the whole school community in its safe and responsible use of technology, including mobile and smart technology (which we refer to as 'mobile phones')
- Set clear guidelines for the use of mobile phones for the whole school community
- Establish clear mechanisms to identify, intervene in and escalate any incidents or concerns, where appropriate

**The 4 key categories of risk**

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

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

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

**To meet our aims and address the risks above we have OnlineSafetyUK working directly with the schools to raise awareness and educate our learners, staff, parents and Trustees. We will:**

- Educate pupils about online safety as part of our curriculum. For example:
  - The safe use of social media, the internet and technology
  - Keeping personal information private
  - How to recognise unacceptable behaviour online
  - How to report any incidents of cyber-bullying, ensuring pupils are encouraged to do so, including where they are a witness rather than a victim
- Train staff, as part of their induction, on safe internet use and online safeguarding issues including cyber-bullying and the risks of online radicalisation. All staff members will receive refresher training at least once each academic year
- Educate parents/carers about online safety via our website, communications sent directly to them and during parents' evenings. We will also share clear procedures with them so they know how to raise concerns about online safety
- Make sure staff are aware of any restrictions placed on them with regards to the use of their mobile phone and cameras, for example that:
  - Staff are allowed to bring their personal phones to school for their own use, but will limit such use to non-contact time when pupils are not present
  - Staff will not take pictures or recordings of pupils on their personal phones or cameras
- Make all pupils, parents/carers, staff, volunteers and Trustees aware that they are expected to sign an agreement regarding the acceptable use of the internet in school, use of the school's ICT systems and use of their mobile and smart technology
- Explain the sanctions we will use if a pupil is in breach of our policies on the acceptable use of the internet and mobile phones
- Make sure all staff, pupils and parents/carers are aware that staff have the power to search pupils' phones, as set out in the [DfE's guidance on searching, screening and confiscation](#)
- Put in place robust filtering and monitoring systems to limit children's exposure to the 4 key categories of risk (described above) from the school's IT systems
- Carry out an annual review of our approach to online safety, supported by an annual risk assessment that considers and reflects the risks faced by our school community

## 8. Notifying parents or carers

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

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

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

In the case of allegations of abuse made against other children, we will normally notify the parents or carers of all the children involved.

## 9. Pupils with special educational needs, disabilities or health issues

We recognise that pupils with special educational needs (SEN) or disabilities or certain health conditions 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 condition without further exploration
● Pupils being more prone to peer group isolation or bullying (including prejudice-based bullying) than other pupils
● The potential for pupils with SEN, disabilities or certain health conditions being disproportionately impacted by behaviours such as bullying, without outwardly showing any signs
● Communication barriers and difficulties in managing or reporting these challenges

We offer extra pastoral support for these pupils. This includes:

● Assigning a mentor from the learning support team who will meet with the student on a regular basis to check on their wellbeing and progress.
● Access to structured break and lunch time activities run by the learning support team.
● Completion of pupil passport to increase pupil voice and to ensure staff are aware of pupil's strengths and areas of concern.
● Completion of diagnostic hub assessment tools to ensure appropriate provision and support is in place.
● Placement onto intervention programs to help develop with either their communication and interaction skills or social, emotional and mental health skills.
● Referrals to relevant outside agents to explore further support.
● Please refer to SEND policy for full details of supportive provision available.

## 10. Pupils with a social worker

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

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

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

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

## 11. Looked-after and previously looked-after children

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

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

We have appointed designated teachers in each school and phase, who are responsible for promoting the educational achievement of looked-after children and previously looked-after children in line with statutory guidance.

The designated teacher is appropriately trained and has the relevant qualifications and experience to perform the role.

As part of their role, the designated teacher will:

● Work closely with the DSL to ensure that any safeguarding concerns regarding looked-after and previously looked-after children are quickly and effectively responded to
● Work with virtual school heads to promote the educational achievement of looked-after and previously looked-after children, including discussing how pupil premium plus funding can be best used to support looked-after children and meet the needs identified in their personal education plans

Further details can be found here:

- https://bayhouse.gfmat.org/parents-and-carers/special-educational-needs/
- https://brunepark.gfmat.org/send/
- https://rowner.gfmat.org/looked-after-children/
- https://gomer.gfmat.org/looked-after-children/

## 12. Complaints and concerns about school safeguarding policies

### 12.1 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).

### 12.2 Other complaints

The GFM has a Complaints Policy that can be found on the individual school's website.

### 12.3 Whistle-blowing

The GFM has a Whistle-blowing Policy (available through the GFM Policy folder.)

## 13. Record-keeping

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

Records will include:

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

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

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

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

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

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

As an organisation we use Google to store all electronic files. This is password protected. Paper copies of safeguarding files are locked away on the school site. Any archived files are stored securely. Access to any files needs to be requested by the DSL or one of the executive head teachers. Information is shared with external agencies when necessary and appropriate, ensuring that we follow GDPR procedures.

# 14. Training

## 14.1 All staff

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

This training will be regularly updated and will:

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

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

Staff will receive regular safeguarding and child protection updates, including on online safety, as part of their ongoing learning and development.  The GFM provides annual, formal training for safeguarding and child protection, with additional training throughout the academic year. (for example, through emails, e-bulletins and staff meetings).

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

Volunteers will receive appropriate training, if applicable.

## 14.2 The DSL and deputies

The DSL and deputies 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.

### 14.3 The Board, Trustee and Schooling Scrutiny and Advisory groups

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

The linked safeguarding Trustee may be required to act as the 'case manager' in the event that an allegation of abuse is made against the School's Executive, they receive training in managing allegations for this purpose.

### 14.4 Recruitment – interview panels

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

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

## 15. Monitoring arrangements

This policy will be reviewed **annually** by the Executive and the Board. At every review, it will be approved by the Trustees.

## 16. Links with other policies

This policy links to the following policies and procedures:

- Behaviour
- Staff Dignity at work Policy
- Complaints
- Health and safety
- Attendance
- Online safety
- Mobile phone use
- Equality and Diversity
- Relationships and sex education

- First aid
- Curriculum
- Designated teacher for looked-after and previously looked-after children
- Privacy notices
- Whistle Blowing
- Peer on Peer Abuse

# Reference 1: Procedure if you have concerns about a child's welfare

**(as opposed to believing a child is suffering or likely to suffer from harm, or in immediate danger) (Note – if the DSL is unavailable, staff should speak to a member of Executive.)**

# Appendices

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

## Appendix 1: types of abuse

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

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

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

Emotional abuse may involve:

● Conveying to a child that they are worthless or unloved, inadequate, or valued only 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 (including via the internet)

Sexual abuse is not solely perpetrated by adult males. Women can also commit acts of sexual abuse, as can other children.

**Neglect** 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.

## Appendix 2: safer recruitment – policy and procedures

### *Recruitment and selection process*

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

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

### Advertising

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

### Application forms

Our application forms will:

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

### Shortlisting

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

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

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

● Complete a self-declaration of their criminal record or any information that would make them unsuitable to work with children, so that they have the opportunity to share relevant information and discuss it at interview stage. The information we will ask for includes:
o If they have a criminal history

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

## Seeking references and checking employment history

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

When seeking references we will:

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

## Interview and selection

When interviewing candidates, we will:

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

### *Pre-appointment vetting checks*

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

**New staff**

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

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

● Check that candidates taking up a management position* are not subject to a prohibition from management (section 128 KCSIE) direction made by the secretary of state

* Management positions are most likely to include, but are not limited to, School's Executives, principals and deputy/assistant School's Executives.

Regulated activity by definition means a person who will be:

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

**Existing staff**

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

● There are concerns about an existing member of staff's suitability to work with children; or

- An individual moves from a post that is not regulated activity to one that is; or
- There has been a break in service of 12 weeks or more

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

- We believe the individual has engaged in relevant conduct; or
- We believe the individual has received a caution or conviction for a relevant (automatic barring either with or without the right to make representations) offence, under the Safeguarding Vulnerable Groups Act 2006 (Prescribed Criteria and Miscellaneous Provisions) Regulations 2009; or
- We believe the 'harm test' is satisfied in respect of the individual (i.e. they may harm a child or vulnerable adult or put them at risk of harm); and
- The individual has been removed from working in regulated activity (paid or unpaid) or would have been removed if they had not left

**GFM Single Central Register**
Suitability and vetting checks are centrally recorded for every member of the GFM community who is a paid employee, a regular volunteer, a regular trainee teacher or a Trustees/Member.

The GFM HR Team are responsible for the maintenance of the SCR in liaison with relevant Executive colleagues and GFM leaders, GFM HR oversee the vetting checks processes and procedures.

GFM HR in liaison with Executive and GFM leaders ensure the implementation and delivery of safer recruitment and selection processes.

Named individuals on each school site have secure access to the SCR for the purpose of leadership oversight, quality assurance and spot checking.

GFM protocols for suitability, vetting and checks on visitors to each of the GFM schools and sites are adhered to and recorded at each school or site and can be found in the GFM Visitor Protocols.

## Appendix 3: allegations of abuse made against staff (taken from KCSIE)

### *Allegations that may meet the harms threshold*

This section applies to all cases in which it is alleged that a current member of staff, including a supply teacher, volunteer or contractor, has:

●       Behaved in a way that has harmed a child, or may have harmed a child, and/or
●       Possibly committed a criminal offence against or related to a child, and/or
●       Behaved towards a child or children in a way that indicates he or she may pose a risk of harm to children, and/or
●       Behaved or may have behaved in a way that indicates they may not be suitable to work with children – this includes behaviour taking place both inside and outside of school

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

A 'case manager' will lead any investigation. This will be the School's Executive, or the chair of Trustees where the School's Executive is the subject of the allegation. The case manager will be identified at the earliest opportunity.
Our procedures for dealing with allegations will be applied with common sense and judgement.

### *Suspension of the accused until the case is resolved*

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

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

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

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

*Definitions for outcomes of allegation investigations*

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

*Procedure for dealing with allegations*

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

● Conduct basic enquiries in line with local procedures to establish the facts to help determine whether there is any foundation to the allegation before carrying on with the steps below
● 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
● Where the case manager is concerned about the welfare of other children in the community or the individual's family, they will discuss these concerns with the DSL and make a risk assessment of the situation. If necessary, the DSL may make a referral to children's social care
● **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 considering 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 ongoing. Any parent or carer who wishes to have the confidentiality restrictions removed in respect of a teacher will be advised to seek legal advice

● Keep the parents or carers of the child/children involved informed of the progress of the case (only in relation to their child – no information will be shared regarding the staff member)

● Make a referral to the DBS where it is thought that the individual facing the allegation or concern has engaged in conduct that harmed or is likely to harm a child, or if the individual otherwise poses a risk of harm to a child

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

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

**Additional considerations for supply teachers and all contracted staff**

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

● We will not decide to stop using an individual due to safeguarding concerns without finding out the facts and liaising with our LADO to determine a suitable outcome

● The governing board will discuss with the agency whether it is appropriate to suspend the individual, or redeploy them to another part of the school, while the school carries out the investigation

● We will involve the agency fully, but the school will take the lead in collecting the necessary information and providing it to the LADO as required

● We will address issues such as information sharing, to ensure any previous concerns or allegations known to the agency are taken into account (we will do this, for example, as part of the allegations management meeting or by liaising directly with the agency where necessary)

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

*Timescales*

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

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

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

*Specific actions*

**Action following a criminal investigation or prosecution**

The case manager will discuss with the local authority's designated officer whether any further action, including disciplinary action, is appropriate and, if so, how to proceed, 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 school will make a referral to the DBS for consideration of whether inclusion on the barred lists is required.
If the individual concerned is a member of teaching staff, the school will consider whether to refer the matter to the Teaching Regulation Agency to consider prohibiting the individual from teaching.

**Individuals returning to work after suspension**

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

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

**Unsubstantiated, unfounded, false or malicious reports**

If a report is:

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

**Unsubstantiated, unfounded, false or malicious allegations**

If an allegation is:

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

*Confidentiality and information sharing*

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

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

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

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

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

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

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

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.

### *References*

When providing employer references, we will:

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

### *Learning lessons*

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

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

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

## Non-recent allegations

Abuse can be reported, no matter how long ago it happened.
We will report any non-recent allegations made by a child to the LADO in line with our local authority's procedures for dealing with non-recent allegations.
Where an adult makes an allegation to the school that they were abused as a child, we will advise the individual to report the allegation to the police.

## Concerns that do not meet the harm threshold

This section applies to all concerns (including allegations) about members of staff, including supply teachers, volunteers and contractors, which do not meet the harm threshold set out above.
Concerns may arise through, for example:
● Suspicion
● Complaint
● Disclosure made by a child, parent or other adult within or outside the school
● Pre-employment vetting checks
We recognise the importance of responding to and dealing with any concerns in a timely manner to safeguard the welfare of children.

## Definition of low-level concerns

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

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

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

● Being overly friendly with children
● Having favourites
● Taking photographs of children on their mobile phone
● Engaging with a child on a one-to-one basis in a secluded area or behind a closed door
● Using inappropriate sexualised, intimidating or offensive language

## Sharing low-level concerns

We recognise the importance of creating a culture of openness, trust and transparency to encourage all staff to share low-level concerns so that they can be addressed appropriately.

We will create this culture by:

- Ensuring staff are clear about what appropriate behaviour is, and are confident in distinguishing expected and appropriate behaviour from concerning, problematic or inappropriate behaviour, in themselves and others
- Empowering staff to share any low-level concerns as per section 7.7 of this policy
- Empowering staff to self-refer
- Addressing unprofessional behaviour and supporting the individual to correct it at an early stage
- Providing a responsive, sensitive and proportionate handling of such concerns when they are raised
- Helping to identify any weakness in the school's safeguarding system

### *Responding to low-level concerns*

If the concern is raised via a third party, the School's Executive will collect evidence where necessary by speaking:

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

The School's Executive will use the information collected to categorise the type of behaviour and determine any further action, in line with the school's Dignity at Work Policy.

### *Record keeping*

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

Records will be:

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

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

## References

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

**Appendix 4: specific safeguarding issues**

*Children missing from education*

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

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

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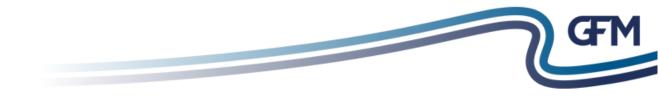● Come from new migrant families

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

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

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

*Child criminal exploitation*

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

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

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

Indicators of CCE can include a child:
● Appearing with unexplained gifts or new possessions
● Associating with other young people involved in exploitation
● Suffering from changes in emotional wellbeing
● Misusing drugs and alcohol
● Going missing for periods of time or regularly coming home late
● Regularly missing school or education
● Not taking part in education

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

### Child sexual exploitation

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

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

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

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

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

● Having an older boyfriend or girlfriend

- Suffering from sexually transmitted infections or becoming pregnant

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

## Domestic abuse

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

Types of domestic abuse include intimate partner violence, abuse by family members, teenage relationship abuse and child/adolescent to parent violence and abuse. Anyone can be a victim of domestic abuse, regardless of gender, age, ethnicity, socioeconomic status, sexuality or background, and domestic abuse can take place inside or outside of the home.

Older children may also experience domestic abuse and/or violence in their own personal relationships.

Exposure to domestic abuse and/or violence can have a serious, long-lasting emotional and psychological impact on children.

If police are called to an incident of domestic abuse and any children in the household have experienced the incident, the police will inform the key adult in school (usually the designated safeguarding lead) before the child or children arrive at school the following day.The DSL will provide support according to the child's needs and update records about their circumstances.

## Homelessness

Being homeless or being at risk of becoming homeless presents a real risk to a child's welfare.
The DSL and deputies will be aware of contact details and referral routes in to the local housing authority so they can raise/progress concerns at the earliest opportunity (where appropriate and in accordance with local procedures).
Where a child has been harmed or is at risk of harm, the DSL will also make a referral to children's social care.

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

So-called 'honour-based' abuse (HBA) encompasses incidents or crimes committed to protect or defend the honour of the family and/or community, including FGM, forced marriage, and practices such as breast ironing.
Abuse committed in this context often involves a wider network of family or community pressure and can include multiple perpetrators.

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

### *FGM*

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

Section 7.3 of KCSIE 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 summarised here.

Indicators that FGM has already occurred include:

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

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

● The girl's family having a history of practising FGM (this is the biggest risk factor to consider)
● FGM being known to be practised in the girl's community or country of origin
● A parent or family member expressing concern that FGM may be carried out
● A family not engaging with professionals (health, education or other) or already being known to social care in relation to other safeguarding issues
● A girl:
● Having a mother, older sibling or cousin who has undergone FGM
● Having limited level of integration within UK society
● Confiding to a professional that she is to have a "special procedure" or to attend a special occasion to "become a woman"

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

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

## *Forced marriage*

Forcing a person into marriage is a crime. A forced marriage is one entered into without the full and free consent of 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 fmu@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 extremist ideologies associated with terrorist groups
● **Extremism** is vocal or active opposition to fundamental British values, such as democracy, the rule of law, individual liberty, and mutual respect and tolerance of different faiths and beliefs. This also includes calling for the death of members of the armed forces
● **Terrorism** is an action that:

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

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

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

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

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

There is no single way of identifying an individual who is likely to be susceptible to an extremist ideology. Radicalisation can occur quickly or over a long period.
Staff will be alert to changes in pupils' behaviour.

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

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

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

If staff are concerned about a pupil, they will discuss their concerns with the DSL.
Staff should **always** take action if they are worried.

### *Peer-on-peer abuse*

Peer-on-peer abuse is when children abuse other children. This type of abuse can take place inside and outside of school and online.

Peer-on-peer abuse is most likely to include, but may not be limited to:

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

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

If staff have any concerns about peer-on-peer abuse, or a child makes a report to them, they will speak to the DSL.

Sexual violence and sexual harassment between children in schools
Sexual violence and sexual harassment can occur:

● Between 2 children of any age and sex

● Through a group of children sexually assaulting or sexually harassing a single child or group of children
● Online and face to face (both physically and verbally)

Sexual violence and sexual harassment exist on a continuum and may overlap.
Children who are victims of sexual violence and sexual harassment will likely find the experience stressful and distressing. This will, in all likelihood, adversely affect their educational attainment and will be exacerbated if the alleged perpetrator(s) attends the same school.

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

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

Staff should be aware of the importance of:

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

If staff have any concerns about sexual violence or sexual harassment, or a child makes a report to them, they will talk to the DSL.
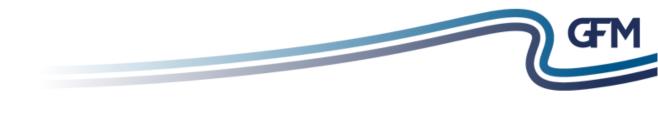
### Serious violence

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

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

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

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

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