

Bowden House School

Safeguarding & the Protection of Children Policy

Contents:

Statement of intent

1. Definitions
2. Legal framework
3. Roles and responsibilities
4. Inter-agency working
5. Abuse and neglect
6. Types of abuse and neglect
7. FGM
8. Forced marriage
9. Child sexual exploitation (CSE)
10. Homelessness
11. County lines criminal activity
12. Serious violence
13. Students with family members in prison
14. Students required to give evidence in court
15. Contextual safeguarding
16. Preventing radicalisation
17. A child missing from education
18. Students with SEND
19. Alternative provision
20. Work experience
21. Homestay exchange visits
22. Private fostering
23. Concerns about a student
24. Early help
25. Managing referrals
26. Concerns about staff members and safeguarding practices
27. Dealing with allegations of abuse against staff
28. Allegations of abuse against other students (peer-on-peer abuse)
29. Communication and confidentiality
30. Online safety
31. Mobile phone and camera safety
32. Sports clubs and extracurricular activities
33. Safer recruitment
34. Single central record (SCR)
35. Staff suitability
36. Training
37. Monitoring and review

Statement of intent

Bowden House School is committed to safeguarding and promoting the welfare, both physical and emotional, of every student both inside and outside of the school premises. We implement a whole-school preventative approach to managing safeguarding concerns, ensuring that the wellbeing of students is at the forefront of all action taken.

This policy sets out a clear and consistent framework for delivering this promise, in line with safeguarding legislation and statutory guidance.

It will be achieved by:

- creating a culture of safer recruitment by adopting procedures that help deter, reject or identify people who might pose a risk to children
- teaching students how to keep safe and recognise behaviour that is unacceptable
- identifying and making provision for any student that has been subject to abuse
- ensuring that members of the Governing Body, the Headteacher and staff members understand their responsibilities under safeguarding legislation and statutory guidance, are alert to the signs of child abuse and know to refer concerns to the DSL
- ensuring that the Headteacher and any new staff members are only appointed when all the appropriate checks have been satisfactorily completed.

The DSL is: Aaron Sherwood (Headteacher) In the absence of the DSL, safeguarding and child protection matters will be dealt with by the Deputy DSLs Esme Anderton (Student & Family Co-ordinator) or Lindsey Haworth (Head of Student Welfare)

Signed by:

Chair of Governors

Date
adopted : 28 January 2020

Review date: October 2020

Definitions

- 1.1 The terms “**children**” and “**child**” refer to anyone under the age of 18.
- 1.2 For the purposes of this policy, “safeguarding and protecting the welfare of children” is defined as:
 - protecting students from maltreatment
 - preventing the impairment of students’ health or development
 - ensuring that students grow up in circumstances consistent with the provision of safe and effective care
 - taking action to enable all students to have the best outcomes.
- 1.3 For the purposes of this policy, the term “**harmful sexual behaviour**” includes but is not limited to, the following actions:
 - using sexually explicit words and phrases
 - inappropriate touching
 - sexual violence or threats
 - full penetrative sex with other children or adults
- 1.4 In accordance with the DfE’s guidance, ‘Sexual violence and sexual harassment between children in schools and colleges’ (2018), and for the purposes of this policy, the term “**sexual harassment**” is used within this policy to describe any unwanted conduct of a sexual nature, both online or offline, which violates a child’s dignity and makes them feel intimidated, degraded or humiliated, and can create a hostile, sexualised or offensive environment.
- 1.5 For the purpose of this policy, the term “**sexual violence**” encompasses the definitions provided in the Sexual Offences Act 2003, including those pertaining to rape, assault by penetration and sexual assault.
- 1.6 For the purposes of this policy, “**upskirting**” refers to the act of taking a picture or video under another person’s clothing, without their knowledge or consent, with the intention of viewing that person’s genitals or buttocks (with or without clothing). Despite the name, anyone (including both students and teachers) and any gender, can be a victim of upskirting.

Legal framework

- 1.7 This policy has been created with due regard to all relevant legislation including but not limited to, the following:

Legislation

- Children Act 1989
- Children Act 2004
- Safeguarding Vulnerable Groups Act 2006
- The Education (School Teachers’ Appraisal) (England) Regulations 2012 (as amended)
- Sexual Offences Act 2003
- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- Voyeurism (Offences) Act 2019

Statutory guidance

- HM Government (2013) 'Multi-agency practice guidelines: Handling cases of Forced Marriage'
- DfE (2018) 'Working Together to Safeguard Children'
- DfE (2015) 'The Prevent duty'
- DfE (2019) 'Keeping children safe in education'
- DfE (2018) 'Disqualification under the Childcare Act 2006'

Non-statutory guidance

- DfE (2015) 'What to do if you're worried a child is being abused'
- DfE (2018) 'Information sharing'
- DfE (2017) 'Child sexual exploitation'
- DfE (2018) 'Sexual violence and sexual harassment between children in schools and colleges'

1.8 Other relevant school policies include:

- Behaviour
- Behaviour Management/Positive Handling
- Students' Anti-bullying
- Safer Recruitment & Selection
- Procedures for Managing Allegations of Abuse Against Staff Working in Children's, School and Family Settings, (LBTH)
- Child Protection Procedures for Staff Working in Children's, School and Family Settings, (LBTH)
- Policy Statement on the Recruitment of ex-offenders
- Disclosure & Barring Service checks
- Absconding Procedures including RMFHC protocols and procedures
- ICT Acceptable Use (staff)
- Safe, Acceptable & Effective Use of the Internet for staff and students
- Code of Conduct
- Complaints (students)
- Complaints (others)
- Bullying & Harassment – staff
- Whistleblowing
- Privacy & Confidentiality
- Physical Activity
- Drug Education
- Sex & Relationships
- Health & Safety
- Fire Safety & Evacuation
- First Aid & Medicine Administration
- Risk Assessments
- Compatibility Assessment
- Barred Teachers' List
- Single Central Record
- Disaster Plan

- Data Protection
- Data Retention

Roles and responsibilities

1.9 The Governing Body has a duty to:

- ensure that the school complies with its duties under the above child protection and safeguarding legislation
- guarantee that the policies, procedures and training opportunities in the school are effective and comply with the law at all times
- guarantee that the school contributes to inter-agency working in line with the statutory guidance 'Working Together to Safeguard Children'
- confirm that the school's safeguarding arrangements take into account the procedures and practices of the LA as part of the inter-agency safeguarding procedures
- understand the local criteria for action and the local protocol for assessment and ensure these are reflected in the school's policies and procedures
- Comply with its obligations under section 14B of the Children Act 2004 to supply the local safeguarding arrangements with information to fulfil its functions
- ensure that staff members have due regard to relevant data protection principles which allow them to share personal information
- ensure that a member of the Governing Body is nominated to liaise with the LA and/or partner agencies on issues of child protection and in the event of allegations of abuse made against the Headteacher or another Governor
- guarantee that there are effective child protection policies and procedures in place together with a staff Code of Conduct
- ensure that there is a Senior Leadership Team responsible for safeguarding arrangements
- appoint a member of staff from the SLT to the role of DSL as an explicit part of the role-holder's job description (Headteacher)
- appoint one or more deputy DSL(s) to provide support to the DSL and ensure that they are trained to the same standard as the DSL and that the role is explicit in their job description(s) (Student & Family Co-ordinator & Head of Student Welfare)
- ensure all relevant persons are aware of the school's local safeguarding arrangements, including the Governing Body itself, the SLT and DSL
- make sure that students are taught about safeguarding, including protection against dangers online, through teaching and learning opportunities, as part of providing a broad and balanced curriculum
- adhere to statutory responsibilities by conducting preemployment checks on staff who work with children, taking proportionate decisions on whether to ask for any checks beyond what is required
- ensure that staff members are appropriately trained to support students to be themselves at school, e.g. if they are LGBTQ+

- guarantee that volunteers are appropriately supervised
- make sure that at least one person on any appointment panel has undertaken safer recruitment training
- ensure that all staff members receive safeguarding and child protection training updates, such as e-bulletins, emails and staff meetings, as required but at least annually
- certify that there are procedures in place to handle allegations against members of staff or volunteers
- confirm that there are procedures in place to make a referral to the DBS and the Teaching Regulation Agency (TRA), where appropriate, if a person in regulated activity has been dismissed or removed due to safeguarding concerns or would have been had they not resigned
- guarantee that there are procedures in place to handle students' allegations against other students
- ensure that appropriate disciplinary procedures are in place, as well as policies pertaining to the behaviour of students and staff
- ensure that procedures are in place to eliminate unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse
- make sure that students' wishes and feelings are taken into account when determining what action to take and what services to provide to protect individual students
- guarantee that there are systems in place for students to express their views and give feedback
- establish an early help procedure and ensure all staff understand the procedure and their role in it
- appoint a designated teacher to promote the educational achievement of LAC and ensure that this person has undergone appropriate training
- ensure that the designated teacher works with the virtual school head to discuss how the Pupil Premium funding can best be used to support LAC
- introduce mechanisms to assist staff in understanding and discharging their roles and responsibilities
- make sure that staff members have the skills, knowledge and understanding necessary to keep LAC safe, particularly with regards to the student's legal status, contact details and care arrangements
- put in place appropriate safeguarding responses for students who go missing from school, particularly on repeat occasions, to help identify any risk of abuse and neglect, including sexual abuse or exploitation and prevent the risk of their disappearance in future
- ensure that all members of the Governing Body have been subject to an enhanced DBS check
- create a culture where staff are confident to challenge senior leaders over any safeguarding concerns.

1.10 The Headteacher has a duty to:

- safeguard students' wellbeing and maintain public trust in the teaching and care professions

- ensure that the policies and procedures adopted by the Governing Body, particularly concerning referrals of cases of suspected abuse and neglect, are followed by staff members
- provide staff, upon induction, with the Safeguarding & Protection of Children Policy, Staff Code of Conduct, part one of the 'Keeping Children Safe in Education' (KCSIE), 2019 guidance, Behaviour Policy and the identity of the DSL and any deputies.

1.11 The DSL has a duty to:

- understand and keep up-to-date with local safeguarding arrangements
- act as the main point of contact with the three safeguarding partners
- make the necessary child protection referrals to appropriate agencies
- liaise with the deputy DSL(s) to ensure effective safeguarding outcomes
- act as a source of support, advice and expertise to staff members on matters of safeguarding by liaising with relevant agencies
- understand the assessment process for providing early help and intervention
- support staff members in liaising with other agencies and setting up inter-agency assessment where early help is deemed appropriate
- keep cases of early help under constant review and refer them to Children's Services if the situation does not appear to be improving
- have a working knowledge of how LAs conduct a child protection case conference and a child protection review conference and be able to attend and contribute to these effectively when required to do so
- ensure each member of staff has access to and understands the school's Safeguarding & the Protection of Children Policy and procedures – this will be discussed during the staff induction process
- be alert to the specific requirements of children in need, including those with SEND and young carers
- keep detailed, accurate and secure records of concerns and referrals
- secure access to resources and attend any relevant training courses
- encourage a culture of listening to children and taking account of their wishes and feelings
- work with the Governing Body to ensure the school's Safeguarding & the Protection of Children Policy is reviewed annually and the procedures are updated regularly
- ensure the school's Safeguarding & the Protection of Children Policy is available publicly and parents/carers are aware that the school may make referrals for suspected cases of abuse or neglect, as well as the role the school plays in these referrals
- link with local safeguarding arrangements to make sure that staff members are aware of the training opportunities available and the latest local policies on safeguarding
- ensure that a student's child protection file is copied when transferring to a new school
- be available at all times during school hours to discuss any safeguarding concerns. NB. The school will determine what "available" means, e.g. it

may be appropriate to be accessible by electronic means such as phone (07763896765) or Skype

- hold the details of the LA personal advisor and liaise with them as necessary.

1.12 The Designated Teacher has a responsibility for promoting the educational achievement of LAC and previously LAC and for children who have left care through adoption, special guardianship or child arrangement orders or who were adopted from state care outside England and Wales.

1.13 Other staff members have a responsibility to:

- safeguard students' wellbeing and maintain public trust in the teaching and care professions as part of their professional duties
- provide a safe environment in which students can learn
- act in accordance with school procedures with the aim of eliminating unlawful discrimination, harassment and victimisation, including those in relation to peer-on-peer abuse
- maintain an attitude of '**it could happen here**' where safeguarding is concerned
- be aware of the signs of abuse and neglect
- be aware of the Early Help process and understand their role in it
- act as the lead professional in undertaking an Early Help assessment, where necessary
- be aware of, and understand, the process for making referrals to Children's Services, as well as for making statutory assessments under the Children Act 1989 and their role in these assessments
- be confident of the processing conditions under relevant data protection legislation, including information which is sensitive and personal and information that should be treated as special category data
- make a referral to Children's Services and/or the police immediately, if at any point there is a risk of immediate serious harm to a child
- be aware of and understand the procedure to follow in the event that a child confides they are being abused or neglected
- support Social Workers in making decisions about individual children, in collaboration with the DSL
- maintain appropriate levels of confidentiality when dealing with individual cases and always act in the best interest of the child
- follow the school's procedure for and approach to, preventing radicalisation
- challenge senior leaders over any safeguarding concerns, where necessary.

Inter-agency working

1.14 the school contributes to inter-agency working as part of its statutory duty

1.15 the school is aware of and will follow the local safeguarding arrangements

- 1.16 the school will work with Children's Services, the police, health services and other services to protect the welfare of its students through the Early Help process and by contributing to inter-agency plans to provide additional support
- 1.17 where a need for early help is identified, the school will allow access for Children's Services from the host LA and where appropriate, a placing LA, for that LA to conduct (or consider whether to conduct) a section 17 or 47 assessment
- 1.18 the school recognises the importance of proactive information sharing between professionals and local agencies in order to effectively meet students' needs and identify any need for Early Help
- 1.19 considering 4.3, staff members are aware that whilst the GDPR and the Data Protection Act 2018 place a duty on schools to process personal information fairly and lawfully, they also allow for information to be stored and shared for safeguarding purposes – data protection regulations do not act as a barrier to sharing information where failure to do so would result in the student being placed at risk of harm
- 1.20 staff members will ensure that fear of sharing information does not stand in the way of their responsibility to promote the welfare and safety of students
- 1.21 if staff members are in doubt about sharing information, they will speak to the DSL or deputy DSLs
- 1.22 the school also recognises the particular importance of inter-agency working in identifying and preventing child sexual exploitation (CSE).

Abuse and neglect

- 1.23 all members of staff will be aware that abuse, neglect and safeguarding issues are rarely standalone events that can be given a specific label and multiple issues often overlap one another
- 1.24 all staff members will be aware of the indicators of abuse and the appropriate action to take following a student being identified as at potential risk of abuse or neglect
- 1.25 when identifying students at risk of potential harm, staff members will look out for a number of indicators including but not limited to, the following:
 - injuries in unusual places, such as bite marks on the neck, that are also inconsistent with their age
 - lack of concentration and acting withdrawn
 - knowledge ahead of their age, e.g. sexual knowledge
 - use of explicit language
 - fear of abandonment
 - depression and low self-esteem
- 1.26 all members of staff will be aware of the indicators of peer-on-peer abuse, such as those in relation to bullying, gender-based violence, sexual assaults and sexting
- 1.27 all staff will be aware of the necessary procedures to follow to prevent peer-on-peer abuse, as outlined in [section 28](#) of this policy
- 1.28 all staff will be aware of the behaviours linked to drug taking, alcohol abuse, truancy and sexting and will understand that these put students in danger

- 1.29 staff members will be aware of the effects of a student witnessing an incident of abuse, such as witnessing domestic violence at home.

Types of abuse and neglect

- 1.30 **Abuse:** a form of maltreatment of a child which involves inflicting harm or failing to act to prevent harm. Children may be abused in a family, institutional or community setting by those known to them or, more rarely, by others, e.g. via the internet
- 1.31 **Physical abuse:** a form of abuse which may involve actions such as hitting, throwing, burning, drowning and poisoning or otherwise causing physical harm to a child. Physical abuse can also be caused when a parent/carer fabricates the symptoms of, or deliberately induces, illness in a child
- 1.32 **Emotional abuse:** a form of abuse which involves the emotional maltreatment of a child to cause severe and adverse effects on the child's emotional development. This may involve telling a child they are worthless, unloved, inadequate, not giving them the opportunities to express their views, deliberately silencing them or often making them feel as though they are in danger
- 1.33 **Sexual abuse:** a form of abuse which involves forcing or enticing a child to take part in sexual activities, not necessarily involving a high level of violence and whether or not the child is aware of what is happening. This may involve physical assault, such as penetrative assault and touching or non-penetrative actions, such as looking at sexual images or encouraging children to behave in inappropriate ways
- 1.34 **Neglect:** a form of abuse which involves the persistent failure to meet a child's basic physical and/or psychological needs, likely to result in serious impairment of a child's health or development. This may involve providing inadequate food, clothing or shelter, or the inability to protect a child from physical or emotional harm or ensure access to appropriate medical treatment.

FGM

- 1.35 for the purpose of this policy, FGM is defined as the partial or total removal of the external female genitalia, or any other injury to the female genital organs
- 1.36 FGM is considered a form of abuse in the UK and is illegal
- 1.37 all staff will be alert to the possibility of a girl being at risk of FGM or already having suffered FGM. If staff members are worried about someone who is at risk of FGM or who has been a victim of FGM, they are required to share this information with social care and/or the police. As an all boys' school, staff will be aware of the risk with female relatives/friends/neighbours
- 1.38 all staff are **legally required** to report to the police any discovery, whether through disclosure by the victim or visual evidence of FGM on a girl under the age of 18. Teachers failing to report such cases will face disciplinary action.

NB. The above does not apply to any suspected or at-risk cases nor if the individual is over the age of 18. In such cases, local safeguarding procedures will be followed.

- 1.39 there are a range of potential indicators that a student's relative/friend/neighbour may be at risk of FGM. While individually they may not indicate risk, if two or more indicators are present, this could signal a risk

- 1.40 victims of FGM are most likely to come from communities that are known to adopt this practice. It is important to note that the student may not yet be aware of the practice or that it may be conducted on their relatives/friends/neighbours, so staff will be sensitive when broaching the subject
- 1.41 indicators that may show a heightened risk of FGM include the following:
- the socio-economic position of the family and their level of integration into UK society
 - any girl with a mother or sister who has been subjected to FGM
 - any girl withdrawn from PSHE
- 1.42 indicators that may show FGM could take place soon include the following:
- when a female, family elder is visiting from a country of origin
 - a girl may confide that she is to have a 'special procedure' or a ceremony to 'become a woman'
 - a girl may request help from a member of staff if she is aware or suspects that she is at immediate risk
 - a girl or her family member, may talk about a long holiday to her country of origin or another country where the practice is prevalent
- 1.43 staff will be vigilant to the signs that FGM has already taken place so that help can be offered, enquiries can be made to protect others and criminal investigations can begin
- 1.44 indicators that FGM may have already taken place include the following:
- difficulty walking, sitting or standing
 - spending longer than normal in the bathroom or toilet
 - spending long periods of time away from a classroom during the day with bladder or menstrual problems
 - prolonged or repeated absences from school followed by withdrawal or depression
 - reluctance to undergo normal medical examinations
 - asking for help but not being explicit about the problem due to embarrassment or fear
- 1.45 teachers will not examine students and so it is rare that they will see any visual evidence but they will report to the police where an act of FGM appears to have been carried out. Unless the teacher has a good reason not to, they should also consider and discuss any such case with the DSL and involve Children's Services, as appropriate
- 1.46 FGM is also included in the definition of 'honour-based' violence (HBV), which involves crimes that have been committed to defend the honour of the family and/or community, alongside forced marriage and breast ironing
- 1.47 all forms of HBV are forms of abuse and will be treated and escalated as such
- 1.48 staff will be alert to the signs of HBV, including concerns that a child is at risk of HBV or has already suffered from HBV and will consult with the DSL who will activate local safeguarding procedures if concerns arise.

The above is for information for the staff at Bowden House School but the students here may have sisters, female cousins/friends/neighbours who are at risk and the boys may share some information.

Forced marriage

- 1.49 for the purpose of this policy, a “**forced marriage**” is defined as a marriage that is 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 the marriage. Forced marriage is classed as a crime in the UK
- 1.50 as part of HBV, staff will be alert to the signs of forced marriage including but not limited to, the following:
- becoming anxious, depressed and emotionally withdrawn with low self-esteem
 - showing signs of mental health disorders and behaviours such as self-harm or anorexia
 - displaying a sudden decline in their educational performance, aspirations or motivation
 - regularly being absent from school
 - displaying a decline in punctuality
 - an obvious family history of older siblings leaving education early and marrying early
- 1.51 if staff members have any concerns regarding a child who may have undergone, is currently undergoing or is at risk of, forced marriage, they should speak to the DSL and local safeguarding procedures will be followed – this could include referral to CSCS, the police or the Forced Marriage Unit.

Child Sexual Exploitation (CSE)

- 1.52 for the purpose of this policy, “**child sexual exploitation**” is defined as: a form of sexual abuse where an individual or group takes advantage of an imbalance of power to coerce, manipulate or deceive a child or young person into sexual activity, for either, or both, of the following reasons:
- in exchange for something the victim needs or wants
 - for the financial advantage or increased status of the perpetrator or facilitator
- 1.53 CSE does not always involve physical contact, as it can also occur online. It is also important to note that a child can be sexually exploited even if the sexual activity appears consensual.
- 1.54 The school has adopted the following procedure for handling cases of CSE, as outlined by the DfE:

Identifying cases

- 1.55 school staff members are aware of and look for the key indicators of CSE; these are as follows:
- going missing for periods of time or regularly going home late
 - regularly missing lessons

- appearing with unexplained gifts and new possessions
- associating with other young people involved in exploitation
- having older boyfriends or girlfriends
- undergoing mood swings or drastic changes in emotional wellbeing
- displaying inappropriate sexualised behaviour
- suffering from sexually transmitted infections or becoming pregnant
- displaying changes in emotional wellbeing
- misusing drugs or alcohol

Referring cases

- 1.56 where CSE or the risk of it, is suspected, staff will discuss the case with the DSL. If after discussion a concern still remains, local safeguarding procedures will be triggered, including referral to the LA.

Support

- 1.57 The LA and all other necessary authorities will then handle the matter to conclusion. The school will cooperate as needed.

Homelessness

- 1.58 the DSL and deputies will be aware of the contact details and referral routes into the Local Housing Authority so that concerns over homelessness can be raised as early as possible.

- 1.59 indicators that a family may be at risk of homelessness include the following:

- household debt
- rent arrears
- domestic abuse
- anti-social behaviour
- any mention of a family moving home because “they have to”

- 1.60 referrals to the Local Housing Authority do not replace referrals to CSCS where a child is being harmed or at risk of harm

- 1.61 for 16- and 17-year-olds, homelessness may not be family-based and referrals to Children’s Services will be made as necessary where concerns are raised.

County lines criminal activity

- 1.62 for the purpose of this policy, “**County lines criminal activity**” refers to drug networks or gangs grooming and exploiting children to carry drugs and money from urban areas to suburban areas, rural areas and market and seaside towns

- 1.63 staff will be made aware of students with missing episodes who may have been trafficked for the purpose of transporting drugs

- 1.64 staff members who suspect a student may be vulnerable to or involved in, this activity will immediately report all concerns to the DSL

- 1.65 the DSL will consider referral to the National Referral Mechanism on a case-by-case basis

- 1.66 indicators that a student may be involved in county lines active include the following:

- persistently going missing or being found out of their usual area
- unexplained acquisition of money, clothes or mobile phones
- excessive receipt of texts or phone calls
- relationships with controlling or older individuals or groups
- leaving home without explanation
- evidence of physical injury or assault that cannot be explained
- carrying weapons
- sudden decline in school results
- becoming isolated from peers or social networks
- self-harm or significant changes in mental state
- parental/carer reports of concern

Serious violence

1.67 through training, all staff will be made aware of the indicators which may signal a student is at risk from or is involved with, serious violent crime. These indicators include but are not limited to, the following:

- increased absence from school
- a change in friendships
- new relationships with older individuals or groups
- a significant decline in academic performance
- signs of self-harm
- a significant change in wellbeing
- signs of assault
- unexplained injuries
- unexplained gifts or new possessions

1.68 staff will be made aware of some of the most significant risk factors that could increase a student's vulnerability to becoming involved in serious violent crime. These risk factors include but are not limited to, the following:

- a history of committing offences
- substance abuse
- anti-social behaviour
- truancy
- peers involved in crime and/or anti-social behaviour

1.69 staff members who suspect a student may be vulnerable to or involved in, serious violent crime will immediately report their concerns to the DSL.

Students with family members in prison

1.70 students with a family member in prison will be offered pastoral support as necessary

1.71 they will receive a copy of '[Are you a young person with a family member in prison](#)' from Action for Prisoners' Families where appropriate and allowed the opportunity to discuss questions and concerns.

Students required to give evidence in court

- 1.72 students required to give evidence in criminal courts, either for crimes committed against them or crimes they have witnessed, will be offered appropriate pastoral support
- 1.73 students will also be provided with the booklet 'Going to Court and being a witness' from HMCTS where appropriate and allowed the opportunity to discuss questions and concerns

Contextual safeguarding

- 1.74 safeguarding incidents can occur outside of school and can be associated with outside factors. School staff, particularly the DSL and the deputies will always consider the context of incidents – this is known as contextual safeguarding
- 1.75 assessment of students' behaviour will consider whether there are wider environmental factors that are a threat to their safety and/or welfare
- 1.76 the school will provide as much contextual information as possible when making referrals to Children's Services.

Preventing radicalisation

- 1.77 for the purpose of this policy, "**radicalisation**" refers to the process by which a person comes to support terrorism and extremist ideologies
- 1.78 protecting children from the risk of radicalisation is part of the school's wider safeguarding duties
- 1.79 the school will actively assess the risk of students being drawn into terrorism
- 1.80 staff will be alert to changes in students' behaviour which could indicate that they may be in need of help or protection. This could include students continually missing medical appointments; missing/refusing medication and parents/carers not following treatment plans. Any concern of this nature should be reported to the DSL
- 1.81 staff will use their professional judgement to identify students who may be at risk of radicalisation and act appropriately, which may include making a referral to the Channel programme. The school will work with local safeguarding arrangements, as appropriate
- 1.82 the school will ensure that they engage with parents/carers and families, as they are in a key position to spot signs of radicalisation. In doing so, the school will assist and advise family members who raise concerns and provide information for support mechanisms
- 1.83 any concerns over radicalisation will be discussed with a child's parents, unless the school has reason to believe that the child would be placed at risk as a result.

Training

- 1.84 the DSL will undertake Prevent awareness training to be able to provide advice and support to other staff on how to protect children against the risk of radicalisation. There will also be regular Home Office, on-line Prevent training for all staff which will be extended to all Governors

Risk indicators of vulnerable students

1.85 indicators of an identity crisis include the following:

- distancing themselves from their cultural/religious heritage
- uncomfortable with their place in society

1.86 indicators of a personal crisis include the following:

- family tensions
- a sense of isolation
- low self-esteem
- disassociation from existing friendship groups
- searching for answers to questions about identity, faith and belonging

1.87 Indicators of vulnerability through personal circumstances includes the following:

- migration
- local community tensions
- events affecting their country or region of origin
- alienation from UK values
- a sense of grievance triggered by personal experience of racism or discrimination

1.88 Indicators of vulnerability through unmet aspirations include the following:

- perceptions of injustice
- feelings of failure
- rejection of civic life
- indicators of vulnerability through criminality
- experiences of dealing with the police
- involvement with criminal groups

Making a judgement

1.89 when making a judgement, staff will ask themselves the following questions:

- does the student have access to extremist influences?
- does the student access the internet for the purposes of extremist activities (e.g. using closed network groups, accessing or distributing extremist material, contacting such groups covertly using Skype)?
- is there a reason to believe that the student has been or is likely to be, involved with extremist organisations?
- is the student known to have possessed or be actively seeking, extremist literature/other media likely to incite racial or religious hatred?
- does the student sympathise with or support illegal/illicit groups?
- does the student support groups with links to extremist activity?
- has the student encountered peer, social, family or faith group rejection?
- is there evidence of extremist ideological, political or religious influence on the student?
- have international events in areas of conflict and civil unrest had a noticeable impact on the student?
- has there been a significant shift in the student's outward appearance that suggests a new social, political or religious influence?

- has the student come into conflict with family over religious beliefs, lifestyle or dress choices?
- does the student vocally support terrorist attacks, either verbally or in their written work?
- has the student witnessed or been the victim of racial or religious hate crimes?
- is there a pattern of regular or extended travel within the UK?
- has the student travelled for extended periods of time to international locations?
- has the student employed any methods to disguise their identity?
- does the student have experience of poverty, disadvantage, discrimination or social exclusion?
- does the student display a lack of affinity or understanding for others?
- is the student the victim of social isolation?
- does the student demonstrate a simplistic or flawed understanding of religion or politics?
- is the student a foreign national or refugee or awaiting a decision on their family's immigration status?
- does the student have insecure, conflicted or absent family relationships?
- has the student experienced any trauma in their lives, particularly trauma associated with war or sectarian conflict?
- is there evidence that a significant adult or other person in the student's life has extremist views or sympathies?

1.90 critical indicators include where the student is:

- in contact with extremist recruiters
- articulating support for extremist causes or leaders
- accessing extremist websites
- possessing extremist literature
- using extremist narratives and a global ideology to explain personal disadvantage
- justifying the use of violence to solve societal issues
- joining extremist organisations
- making significant changes to their appearance and/or behaviour.

1.91 any member of staff who identifies such concerns, because of observed behaviour or reports of conversations, will report these to the DSL.

1.92 the DSL will consider whether a situation may be so serious that an emergency response is required. In this situation, a 999 call will be made; however, concerns are most likely to require a police investigation as part of the Channel programme, in the first instance.

The Channel Programme

1.93 safeguarding children is a key role for both the school and the LA, which is implemented through the use of the Channel programme. This service shall be used where a vulnerable student is at risk of being involved in terrorist activities

1.94 in cases where the school believes a student is potentially at serious risk of being radicalised, the Headteacher or DSL/(s) will contact the Channel programme

- 1.95 the DSL will also support any staff making referrals to the Channel programme
- 1.96 the Channel programme ensures that vulnerable children and adults of any faith, ethnicity or background, receive support before their vulnerabilities are exploited by those that would want them to embrace terrorism and before they become involved in criminal terrorist-related activity
- 1.97 the programme identifies individuals at risk, assesses the extent of that risk and develops the most appropriate support plan for the individuals concerned, with multi-agency cooperation and support from the school
- 1.98 the delivery of the Channel programme may often overlap with the implementation of the LA's or school's wider safeguarding duty, especially where vulnerabilities have been identified that require intervention from Children's Services, or where the individual is already known to Children's Services.

Extremist speakers

- 1.99 the Visitors' Policy will prevent speakers who may promote extremist views from using the school premises.

Building children's resilience

- 1.100 the school will:
- provide a safe environment for debating controversial issues
 - promote fundamental British values, alongside students' spiritual, moral, social and cultural development
 - allow students time to explore sensitive and controversial issues
 - provide students with the knowledge and skills to understand and manage potentially difficult situations, recognise risk, make safe choices and recognise where pressure from others threatens their personal safety and wellbeing
 - equip students to explore political and social issues critically, weigh evidence, debate, and make reasoned arguments
 - teach students about how democracy, government and law making/enforcement occur
 - teach students about mutual respect and understanding for the diverse national, regional, religious and ethnic identities of the UK.

Resources

- 1.101 the school will utilise the following resources when preventing radicalisation:
- local safeguarding arrangements
 - local police (contacted via 101 for non-emergencies)
 - the DfE's dedicated helpline (020 7340 7264)
 - the Channel awareness programme
 - the [Educate Against Hate](#) website

A child missing from education

- 1.102 a child going missing from school is a potential indicator of abuse or neglect and, as such, these children are increasingly at risk of being victims of harm, exploitation or radicalisation

- 1.103 staff will monitor students that go missing from the school, particularly on repeat occasions and report them to the DSL following normal safeguarding procedures, in accordance with the Absconding Procedures & RMFHC Protocols
- 1.104 the school will inform the LA of any student who fails to attend regularly or has been absent without the school's permission for a continuous period of 10 school days or more.

Admissions register

- 1.105 students are placed on the admissions register at the beginning of the first day that is agreed by the school or when the school has been notified that the pupil will first be attending
- 1.106 the school will notify the LA within five days of when a student's name is added to the admissions register
- 1.107 the school will ensure that the admissions register is kept up-to-date and accurate at all times and will inform parents/carers when any changes occur
- 1.108 two emergency contact details will be held for each student where possible
- 1.109 staff will monitor students who do not attend the school on the agreed date and will notify the LA (Attendance & Welfare) at the earliest opportunity
- 1.110 if a parent/carer notifies the school that their child will live at a different address, the school will record the following information on the admissions register:
- the full name of the parent/carer with whom the student will live
 - the new address
 - the date from when the student will live at that address
- 1.111 if a parent/carer notifies the school that their child will be attending a different school or is already registered at a different school, the following information will be recorded on the admissions register:
- the name of the new school
 - the date on which the student first attended or is due to attend, that school
- 1.112 where a student moves to a new school, the school will use a secure internet system to securely transfer students' data
- 1.113 to ensure accurate data is collected to allow effective safeguarding, the school will inform the LA of any student who is going to be deleted from the admission register, in accordance with the Education (Pupil Registration) (England) Regulations 2006 (as amended), where they:
- have been taken out of the school by their parents/carers and where alternative education provision has been secured
 - have ceased to attend the school and no longer live within a reasonable distance of the school
 - have been certified by the school's medical officer as unlikely to be in a fit state of health to attend, before ceasing to be of compulsory school age and their parent/carer has not indicated the intention to the student

continuing to attend school after ceasing to be of compulsory school age
(an unlikely situation at Bowden House School)

- have been in custody for a period of more than four months due to a final court order and the school does not reasonably believe they will be returning to the school at the end of that period.
- have been permanently excluded.

1.114 the school will also remove a student from the admissions register where the school and LA has been unable to establish the student's whereabouts after making reasonable enquiries into their attendance.

1.115 if a student is to be removed from the admissions register, the school will provide the LA with the following information:

- the full name of the student
- the full name and address of any parent/carer with whom the student lives
- at least one telephone number of the parent/carer with whom the student lives
- the full name and address of the parent/carer with whom the student is going to live and the date that the student will start living there, if applicable
- the name of the student's new school and the student's expected start date there, if applicable
- the grounds for removal from the admissions register under regulation 8 of the Education (Pupil Registration) (England) Regulations 2006 (as amended)

1.116 the school will work with the LA to establish methods of making returns for students back into the school

1.117 the school will highlight to the LA where they have been unable to obtain necessary information from parents/carers, e.g. where an address is unknown

1.118 the school will also highlight any other necessary contextual information including safeguarding concerns

Students with SEND

1.119 the school recognises that students with SEND can face additional safeguarding challenges and understands that further barriers may exist when determining abuse and neglect in this group of students

1.120 staff will be aware of the following:

- certain indicators of abuse, such as behaviour, mood and injury, may relate to the student's disability without further exploration; however, it should never be assumed that a child's indicators relate only to their disability
- students with SEND can be disproportionately impacted by things like bullying, without outwardly showing any signs
- communication barriers may exist, as well as difficulties in overcoming these barriers

1.121 when reporting concerns or making referrals for students with SEND, the above factors will always be taken into consideration

- 1.122 when managing a safeguarding issue relating to a student with SEND, the DSL will liaise with the school's SENCO, as well as the student's family where appropriate, to ensure that the student's needs are effectively met

Alternative provision

- 1.123 the school will remain responsible for a student's welfare during their time at an alternative provider
- 1.124 when placing a student with an alternative provider, the school will obtain written confirmation that the provider has conducted all relevant safeguarding checks on staff.

Work experience

- 1.125 when a student is sent on work experience, the school will ensure that the provider has appropriate safeguarding policies and procedures in place.
- 1.126 where the school has students conduct work experience at the school, an enhanced DBS check will be obtained if the student is over the age of 16 ([students at Bowden House School do not currently attend work experience](#))

Homestay exchange visits

School-arranged homestays in UK

- 1.127 where the school is arranging for a visiting child to be provided with care and accommodation in the UK in the home of a family to which the child is not related, the responsible adults are considered to be in regulated activity for the period of the stay
- 1.128 in such cases, the school is the regulated activity provider; therefore, the school will obtain all the necessary information required, including a DBS enhanced certificate with barred list information, to inform its assessment of the suitability of the responsible adults
- 1.129 where criminal record information is disclosed, the school will consider, alongside all other information, whether the adult is a suitable host
- 1.130 in addition to the responsible adults, the school will consider whether a DBS enhanced certificate should be obtained for anyone else aged over 16 in the household. ([this would be an unlikely scenario at our school so this is for information purposes only](#))

School-arranged homestays abroad

- 1.131 the school will liaise with partner schools to discuss and agree the arrangements in place for the visit
- 1.132 the school will consider, on a case-by-case basis, whether to contact the relevant foreign embassy or High Commission of the country in question to ascertain what checks may be possible in respect of those providing homestay outside of the UK.
- 1.133 the school will use its professional judgement to assess whether the arrangements are appropriate and sufficient to safeguard every child involved in the exchange
- 1.134 students will be provided with emergency contact details to use where an emergency occurs or a situation arises that makes them feel uncomfortable. ([as with Point 21](#))

Privately arranged homestays

1.135 where a parent/carer or student arranges their own homestay, this is a private arrangement and the school is not the regulated activity provider

Private fostering

1.136 where the school becomes aware of a student being privately fostered, they will notify the LA as soon as possible to allow the LA to conduct any necessary checks

Concerns about a student

1.137 if a member of staff has any concern about a child's welfare, they will act on them immediately by speaking to the DSL or one of the Deputies

1.138 all staff members are aware of the procedure for reporting concerns and understand their responsibilities in relation to confidentiality and information sharing, as outlined in [section 28](#) of this policy

1.139 where the DSL is not available to discuss the concern with, staff members will contact one of the Deputy DSLs with the matter

1.140 if a referral is made about a student by anyone other than the DSL, the DSL will be informed as soon as possible

1.141 the LA will make a decision regarding what action is required within one working day of the referral being made and will notify the referrer

1.142 staff are required to monitor a referral if they do not receive information from the LA regarding what action is necessary for the student

1.143 if the situation does not improve after a referral, the DSL will ask for reconsideration to ensure that their concerns have been addressed and that the situation improves for the student

1.144 if early help is appropriate, the case will be kept under constant review. If the student's situation does not improve, a referral will be considered

1.145 all concerns, discussions and decisions made, as well as the reasons for making those decisions, will be recorded in writing by the DSL or one of the Deputy DSLs and kept securely in a Safeguarding & the Protection of Children Book (kept in the office of The Student & Family Co-ordinator) and on BehaviourWatch

1.146 if a student is in immediate danger, a referral will be made to Children's Services and/or the police immediately

1.147 if a student has committed a crime, such as sexual violence, the police will be notified without delay

1.148 where there are safeguarding concerns, the school will ensure that the student's wishes are always taken into account and that there are systems available for students to provide feedback and express their views

1.149 when responding to safeguarding concerns, staff members will act calmly and supportively, ensuring that the student feels like they are being listened to and believed

1.150 an inter-agency assessment will be undertaken where a student and their family /carers could benefit from coordinated support from more than one agency. These assessments will identify what help the student and family/carers require in preventing needs escalating to a point where intervention would be needed.

Early Help

- 1.151 Early Help means providing support as soon as a problem emerges, at any point in a child's life.
- 1.152 any student may benefit from early help but in particular staff will be alert to the potential need for early help for students who:
- have SEND (whether or not they have a statutory EHC Plan)
 - are young carers
 - show signs of being drawn into anti-social or criminal behaviour, including gang involvement and association with organised crime groups
 - are frequently missing/going missing from school, care or from home
 - misuse drugs or alcohol
 - are at risk of modern slavery, trafficking or exploitation
 - are in a family/carer circumstance presenting challenges such as substance abuse, adult mental health problems or domestic abuse
 - are returned home to their family from care
 - show early signs of abuse and/or neglect
 - are at risk of being radicalised or exploited
 - are privately fostered.
- 1.153 Early Help will also be used to address non-violent harmful sexual behaviour to prevent escalation.
- 1.154 all staff will be made aware of the local early help process and understand their role in it.
- 1.155 the DSL will take the lead where early help is appropriate.

Managing referrals

- 1.156 the reporting and referral process outlined in [Appendix B](#) will be followed accordingly
- 1.157 all staff members, in particular the DSL, will be aware of the LA's arrangements in place for managing referrals. The DSL will provide staff members with clarity and support where needed
- 1.158 when making a referral to Children's Services or other external agencies, information will be shared in line with confidentiality requirements and will only be shared where necessary to do so
- 1.159 the DSL will work alongside external agencies, maintaining continuous liaison, including multi-agency liaison where appropriate, in order to ensure the wellbeing of the students involved
- 1.160 the DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings and to obtain help and support as necessary
- 1.161 where a student has been harmed or is in immediate danger or at risk of harm, the referrer will be notified of the action that will be taken within one working day of a referral being made. **Where this information is not forthcoming, the referrer will contact the assigned social worker for more information**

- 1.162 the school will not wait for the start or outcome of an investigation before protecting the victim and other students: this applies to criminal investigations as well as those made by Children's Services
- 1.163 where Children's Services decide that a statutory investigation is not appropriate, the school will consider referring the incident again if it is believed that the student is at risk of harm
- 1.164 where Children's Services decide that a statutory investigation is not appropriate and the school agrees with this decision, the school will consider the use of other support mechanisms, such as early help and pastoral support
- 1.165 at all stages of the reporting and referral process, the student will be informed of the decisions made, actions taken and reasons for doing so
- 1.166 discussions of concerns with parents/carers will only take place where this would not put the student or others at potential risk of harm
- 1.167 the school will work closely with parents/carers to ensure that the student, as well as their family, understands that the arrangements in place, such as in-school interventions, are effectively supported and know where they can access additional support.

Concerns about staff members and safeguarding practices

- 1.168 if a staff member has concerns about another member of staff, it will be raised with the Headteacher
- 1.169 if the concern is with regards to the headteacher, it will be referred to the Chair of Governors
- 1.170 any concerns regarding the safeguarding practices at the school will be raised with the SLT and the necessary whistleblowing procedures will be followed, as outlined in the Whistleblowing Policy
- 1.171 if a staff member feels unable to raise an issue with the SLT, they should access other whistleblowing channels such as the NSPCC whistleblowing helpline (0800 028 0285)
- 1.172 any allegations of abuse made against staff members will be dealt with in accordance with the |London Borough of Tower Hamlets' Procedures for allegations against staff in schools.

Dealing with allegations of abuse against staff

- 1.173 all allegations will be dealt with in line with the London Borough of Tower Hamlets' Procedures for allegations against staff in schools, a copy of which is available to all staff via the staff Shared Drive and in hard copy in all Departments
- 1.174 when an allegation is made, the DSL or designate, should contact the SPoA or LADO in East Sussex before any investigation is undertaken as to evidence which might establish whether there is a foundation to the allegation. Any evidence gathered has to be sufficient to meet the DBS referral criteria
- 1.175 on conclusion of a case, where an individual is removed from regulated activity – this could be due to suspension, redeployment to work that is not in regulated activity, dismissal or resignation – the school will refer the case to the DBS as soon as possible

- 1.176 if a case manager is concerned about the welfare of other children in the community following a staff member's suspension, they may report this concern to Children's Services
- 1.177 the school will preserve records which contain information about allegations of sexual abuse for the Independent Inquiry into Child Sexual Abuse (IICSA), for the term of the inquiry in question.

Allegations of abuse against other students (peer-on-peer abuse)

Sexual Harassment

- 1.178 sexual harassment refers to unwanted conduct of a sexual nature that occurs online or offline. Sexual harassment violates a student's dignity and makes them feel intimidated, degraded or humiliate and can create a hostile, sexualised or offensive environment. If left unchallenged, sexual harassment can create an atmosphere that normalises inappropriate behaviour and may lead to sexual violence
- 1.179 Sexual Harassment includes:
- sexual comments
 - sexual "jokes" and taunting
 - physical behaviour, such as deliberately brushing against another student
 - online sexual harassment, including non-consensual sharing of images and videos and consensual sharing of sexual images and videos (often known as sexting), inappropriate comments on social media, exploitation, coercion and threats – online sexual harassment may be isolated or part of a wider pattern.

Sexual Violence

- 1.180 sexual violence refers to the three following offences:
- **Rape:** A person (A) commits an offence of rape if he intentionally penetrates the vagina, anus or mouth of another person (B) with his penis, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Assault by Penetration:** A person (A) commits an offence if s/he intentionally penetrates the vagina or anus of another person (B) with a part of her/his body or anything else, the penetration is sexual, B does not consent to the penetration and A does not reasonably believe that B consents.
 - **Sexual Assault:** A person (A) commits an offence of sexual assault if s/he intentionally touches another person (B), the touching is sexual, B does not consent to the touching and A does not reasonably believe that B consents.
 - Harmful sexual behaviours
- 1.181 the term "**harmful sexual behaviour**" is used to describe behaviour that is problematic, abusive and violent and that may cause developmental damage. Harmful sexual behaviour may include:
- using sexually explicit words and phrases
 - inappropriate touching

- sexual violence or threats
- full penetrative sex with other children or adults
- sexual interest in adults or children of very different ages to their own
- forceful or aggressive sexual behaviour
- compulsive habits
- sexual behaviour affecting progress and achievement
- using sexually explicit words and phrases
- inappropriate touching
- sexual violence or threats.

1.182 sexual behaviour can also be harmful if one of the students is much older (especially where there is two years or more difference or where one child is pre-pubescent and the other is not) and where the child may have SEND

A preventative approach

1.183 in order to prevent peer-on-peer abuse and address the wider societal factors that can influence behaviour, the school will educate students about abuse, its forms and the importance of discussing any concerns and respecting others through the curriculum, assemblies and RSHE lessons

1.184 the school will also ensure that students are taught about safeguarding, including online safety, as part of a broad and balanced curriculum in RSHE lessons, RSE and group sessions. Such content will be age and stage of development specific, and tackle issues such as the following:

- healthy relationships
- respectful behaviour
- gender roles, stereotyping and equality
- body confidence and self-esteem
- prejudiced behaviour
- that sexual violence and sexual harassment is always wrong
- addressing cultures of sexual harassment

1.185 students will be allowed an open forum to talk about concerns and sexual behaviour. They are taught how to raise concerns and make a report, including concerns about their friends or peers, and how a report will be handled

Awareness

1.186 all staff will be aware that students of any age and sex are capable of abusing their peers and will never tolerate abuse as “banter” or “part of growing up”

1.187 all staff will be aware that peer-on-peer abuse can be manifested in many different ways, including sexting and gender issues, such as girls being sexually touched or assaulted and boys being subjected to hazing/initiation type of violence which aims to cause physical, emotional or psychological harm

1.188 all staff will be made aware of the heightened vulnerability of students with SEND, who are three times more likely to be abused than their peers. Staff will not assume that possible indicators of abuse relate to the student’s SEND and will always explore indicators further

- 1.189 LGBTQ+ students can be targeted by their peers. In some cases, students who are perceived to be LGBTQ+, whether they are or not, can be just as vulnerable to abuse as LGBTQ+ students
- 1.190 the school's response to boy-on-boy and girl-on-girl sexual violence and sexual harassment will be equally as robust as it is for incidents between children of the opposite sex
- 1.191 students will be made aware of how to raise concerns or make a report and how any reports will be handled. This includes the process for reporting concerns about friends or peers

Support available if a student has been harmed, is in immediate danger or at risk of harm

- 1.192 if a student has been harmed, is in immediate danger or is at risk of harm, a referral will be made to Children's Services
- 1.193 within one working day, a social worker will respond to the referrer to explain the action that will be taken.

Support available if Early Help, section 17 and/or section 47 statutory assessments are appropriate

- 1.194 if Early Help, section 17 and/or section 47 statutory assessments (assessments under the Children Act 1989) are appropriate, school staff may be required to support external agencies. The DSL and deputies will support staff as required.

Support available if a crime may have been committed

- 1.195 rape, assault by penetration and sexual assaults are crimes. Where a report includes such an act, the police will be notified, often as a natural progression of making a referral to Children's Services. The DSL will be aware of the local process for referrals to both Children's Services and the police
- 1.196 whilst the age of criminal responsibility is 10 years of age, if the alleged perpetrator is under 10, the principle of referring to the police remains. In these cases, the police will take a welfare approach rather than a criminal justice approach
- 1.197 the school has a close relationship with the local police force and the DSL will liaise closely with the local police presence

Support available if reports include online behaviour

- 1.198 online concerns can be especially complicated. The school recognises that there is potential for an online incident to extend further than the local community and for a victim or the alleged perpetrator, to become marginalised and excluded both online and offline. There is also strong potential for repeat victimisation if the content continues to exist
- 1.199 if the incident involves sexual images or videos held online, the Internet Watch Foundation will be consulted to have the material removed
- 1.200 staff will not view or forward illegal images of a child. If they are made aware of such an image, they will contact the DSL.

Managing disclosures

- 1.201 victims will always be taken seriously, reassured, supported and kept safe. Victims will never be made to feel like they are causing a problem or made to feel ashamed
- 1.202 if a friend of a victim makes a report or a member of staff overhears a conversation, staff will take action – they will never assume that someone else will deal with it. The basic principles remain the same as when a victim reports an incident; however, staff will consider why the victim has not chosen to make a report themselves and the discussion will be handled sensitively and with the help of Children’s Services where necessary. If staff are in any doubt, they will speak to the DSL
- 1.203 where an alleged incident took place away from the school or online but involved students from the school, the school’s duty to safeguard students remains the same
- 1.204 all staff will be trained to handle disclosures. Effective safeguarding practice includes:
- never promising confidentiality at the initial stage
 - only sharing the report with those necessary for its progression
 - explaining to the victim what the next steps will be and who the report will be passed to
 - recognising that the person the child chose to disclose the information to is in a position of trust
 - being clear about boundaries and how the report will be progressed
 - not asking leading questions and only prompting the child with open questions
 - waiting until the end of the disclosure to immediately write a thorough summary. If notes must be taken during the disclosure, it is important to still remain engaged and not appear distracted
 - only recording the facts as the child presents them – not the opinions of the note taker
 - where the report includes an online element, being aware of searching, screening and confiscation advice and UKCCIS sexting advice
 - wherever possible, managing disclosures with two staff members present (preferably with the DSL or one of the Deputies, as one of the staff members)
 - informing the DSL or one of the Deputies as soon as possible after the disclosure if they could not be involved in the disclosure.
- 1.205 the DSL will be informed of any allegations of abuse against students with SEND. They will record the incident in writing and on BehaviourWatch working with the SENCO, decide what course of action is necessary, with the best interests of the student in mind at all times.

Confidentiality

- 1.206 the school will only engage staff and agencies required to support the victim and/or be involved in any investigation. If a victim asks the school not to tell anyone about the disclosure, the school cannot make this promise. Even without the victim’s consent, the information may still be lawfully shared if it is in the public interest and protects children from harm

- 1.207 the DSL will consider the following when making confidentiality decisions:
- parents/carers will be informed unless it will place the victim 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 Services
 - rape, assault by penetration and sexual assaults are crimes – reports containing any such crimes will be passed to the police.

1.208 the DSL will weigh the victim's wishes against their duty to protect the victim and others. If a referral is made against the victim's wishes, it will be done so extremely carefully and the reasons for referral will be explained to the victim. Appropriate specialist support will always be offered.

Anonymity

- 1.209 there are legal requirements for anonymity where a case is progressing through the criminal justice system. The school will do all it can to protect the anonymity of students involved in any report of sexual violence or sexual harassment. It will carefully consider, based on the nature of the report, which staff will be informed and what support will be in place for the student(s) involved
- 1.210 when deciding on the steps to take, the school will consider the role of social media in potentially exposing victims' identities and facilitating the spread of rumours.

Risk Assessment

- 1.211 the DSL or one of the Deputies will make an immediate risk and needs assessment any time there is a report of sexual violence. For reports of sexual harassment, a risk assessment will be considered on a case-by-case basis. Risk assessments are not intended to replace the detailed assessments of experts and for incidents of sexual violence it is likely that a professional risk assessment by a social worker or sexual violence specialist will be required.
- 1.212 risk assessments will consider:
- the victim.
 - the alleged perpetrator
 - other children at the school, especially any actions that are appropriate to protect them.

1.213 risk assessments will be recorded (either on paper or electronically) and kept under review in accordance with the school's Data Protection Policy

Taking action following a disclosure

- 1.214 the DSL or one of the Deputies will decide the school's initial response, taking into consideration:
- the victim's wishes
 - the nature of the incident
 - the ages and developmental stages of the students involved
 - any power imbalance between the students
 - whether the incident is a one-off or part of a pattern
 - any ongoing risks

- any related issues and the wider context, such as whether there are wider environmental factors in a student's life that threaten their safety and/or welfare
 - the best interests of the student
 - that sexual violence and sexual harassment are always unacceptable and will not be tolerated
- 1.215 immediate consideration will be given as to how to support the victim, alleged perpetrator and any other students involved.
- 1.216 for reports of rape and assault by penetration, whilst the school establishes the facts, the alleged perpetrator will be removed from any classes shared with the victim. The school will consider how to keep the victim and alleged perpetrator apart on school premises and on transport, where applicable. These actions will not be seen as a judgement of guilt on the alleged perpetrator
- 1.217 for reports of sexual violence and sexual harassment, the proximity of the victim and alleged perpetrator and the suitability of shared classes, premises and transport will be considered immediately
- 1.218 in all cases, the initial report will be carefully evaluated and the wishes of the victim, nature of the allegations and requirement to protect all student will be taken into consideration.

Managing the report

- 1.219 the decision of when to inform the alleged perpetrator of a report will be made on a case-by-case basis. If a report is being referred to Children's Services or the police, the school will speak to the relevant agency to discuss informing the alleged perpetrator
- 1.220 there are four likely outcomes when managing reports of sexual violence or sexual harassment:
- managing internally
 - providing Early Help
 - referring to Children's Services
 - reporting to the police
- 1.221 whatever outcome is chosen, it will be underpinned by the principle that sexual violence and sexual harassment is never acceptable and will not be tolerated. All concerns, discussion, decisions and reasons behind decisions will be recorded either on paper or electronically (BehaviourWatch)
- 1.222 the following situations are statutorily clear and do not allow for contrary decisions:
- a child under the age of 13 can never consent to sexual activity
 - the age of consent is 16
 - sexual intercourse without consent is rape
 - rape, assault by penetration and sexual assault are defined in law
 - creating and sharing sexual photos and videos of children under 18 is illegal – including children making and sending images and videos of themselves.

Managing internally

- 1.223 in some cases, e.g. one-off incidents, the school may decide to handle the incident internally through behaviour and bullying policies and by providing pastoral support. If there is any doubt as to the correct course of action, advice should be sought from the Local Safeguarding Partnership/SPoA

Providing Early Help

- 1.224 the school may decide that statutory interventions are not required but that students may benefit from Early Help – providing support as soon as a problem emerges. This approach can be particularly useful in addressing non-violent harmful sexual behaviour and may prevent escalation of sexual violence.

Referral to Children's Services

- 1.225 if a child has been harmed, is at risk of harm or is in immediate danger, the school will make a referral to Children's Services. Parents/carers will be informed unless there is a compelling reason not to do so (if referral will place the victim at risk). This decision will be made in consultation with Children's Services
- 1.226 the school will not wait for the outcome of an investigation before protecting the victim and other students
- 1.227 the DSL will work closely with Children's Services to ensure that the school's actions do not jeopardise any investigation. Any related risk assessment will be used to inform all decisions
- 1.228 if Children's Services decide that a statutory investigation is not appropriate, the school will consider referring the incident again if they believe the student to be in immediate danger or at risk of harm
- 1.229 if the school agrees with the decision made by Children's Services, they will consider the use of other support mechanisms such as Early Help, pastoral support and specialist support.

Reporting to the police

- 1.230 reports of rape, assault by penetration or sexual assault will be passed on to the police – even if the alleged perpetrator is under 10 years of age. Generally, this will be in parallel with referral to Children's Services. The DSL and Deputies will follow the local process for referral
- 1.231 parents/carers will be informed unless there is a compelling reason not to do so. Where parents/carers are not informed, it is essential for the school to support the student with any decision they take, in unison with Children's Services and any appropriate specialist agencies
- 1.232 the DSL and the Governing Body will agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents/carers. They will also discuss the best way to protect the victim and their anonymity
- 1.233 the DSL will be aware of local arrangements and specialist units that investigate child abuse

1.234 in some cases, it may become clear that the police will not take further action, for whatever reason. In these circumstances, the school will continue to engage with specialist support for the victim as required.

Bail conditions

1.235 Police bail is only used in exceptional circumstances. It is unlikely that a child will be placed on police bail if alternative measures can be used to mitigate risks

1.236 the school will work with Children's Services and the police to support the victim, alleged perpetrator and other students (especially witnesses) during criminal investigations. The school will seek advice from the police to ensure they meet their safeguarding responsibilities

1.237 the term 'released under investigation' (RUI) is used to describe alleged perpetrators released in circumstances that do not warrant the application of bail

1.238 where bail is deemed necessary, the school will work with Children's Services and the police to safeguard children – ensuring that the victim can continue in their normal routine and continue to receive a suitable education

1.239 managing delays in the criminal justice system

1.240 the school will not wait for the outcome (or even the start) of criminal proceedings before protecting the victim, alleged perpetrator and other students. The associated risk assessment will be used to inform any decisions made

1.241 the DSL will work closely with the police to ensure the school does not jeopardise any criminal proceedings and to obtain help and support as necessary.

The end of the criminal process

1.242 risk assessments will be updated if the alleged perpetrator receives a caution or is convicted. If the perpetrator remains in the same school as the victim, the school will set out clear expectations regarding the perpetrator, including their behaviour and any restrictions deemed reasonable and proportionate with regards to the perpetrator's timetable

1.243 the school will ensure that the victim and perpetrator remain protected from bullying and harassment (including online)

1.244 where an alleged perpetrator is found not guilty or a case is classed as requiring "no further action", the school will offer support to the victim and alleged perpetrator for as long as is necessary. The victim is likely to be traumatised and the fact that an allegation cannot be substantiated does not necessarily mean that it was unfounded. The school will discuss decisions with the victim and offer support

1.245 the alleged perpetrator is also likely to require ongoing support, as they have also been through a difficult and upsetting experience

- ongoing support for the victim

1.246 any decisions regarding safeguarding and supporting the victim will be made with the following considerations in mind:

- the terminology the school uses to describe the victim
- the age and developmental stage of the victim

- the needs and wishes of the victim
 - whether the victim wishes to continue in their normal routine
 - the victim will not be made to feel ashamed about making a report
 - what a proportionate response looks like
- 1.247 victims may not disclose the whole picture immediately and they may be more comfortable talking about the incident on a piecemeal basis; therefore, a dialogue will be kept open and the victim can choose to appoint a designated trusted adult
- 1.248 victims may struggle in a normal classroom environment. Whilst it is important not to isolate the victim, he may wish to be withdrawn from lessons and activities at times. This will only happen when the victim wants it to, not because it makes it easier to manage the situation
- 1.249 the school will provide a physical space for victims to withdraw to
- 1.250 victims may require support for a long period of time and the school will be prepared to offer long-term support in liaison with relevant agencies
- 1.251 everything possible will be done to prevent the victim from bullying and harassment as a result of any report they have made
- 1.252 if the victim is unable to remain in the school, alternative provision or a move to another school will be considered – this will only be considered at the request of the victim and following discussion with their parents/carers
- 1.253 if the victim does move to another school, the DSL will inform the school of any ongoing support needs and transfer the child protection file.
- ongoing support for the alleged perpetrator
- 1.254 when considering the support required for an alleged perpetrator, the school will take into account:
- the terminology they use to describe the alleged perpetrator or perpetrator
 - the balance of safeguarding the victim and providing the alleged perpetrator with education and support
 - the reasons why the alleged perpetrator may have abused the victim – and the support necessary
 - their age and developmental stage
 - what a proportionate response looks like
 - whether the behaviour is a symptom of their own abuse or exposure to abusive practices and/or materials.
- 1.255 when making a decision, advice will be taken from Children’s Services, specialist sexual violence services and the police as appropriate
- 1.256 if the alleged perpetrator moves to another school (for any reason), the DSL will inform the destination school of any ongoing support needs and transfer the child protection file
- 1.257 the school will work with professionals as required to understand why the abuse took place and provide a high level of support to help the student understand and overcome the reasons for their behaviour and reduce the likelihood of them abusing again

- 1.258 disciplining the alleged perpetrator
- 1.259 disciplinary action can be taken whilst investigations are ongoing and the fact that investigations are ongoing does not prevent the school reaching its own conclusion and imposing an appropriate penalty
- 1.260 the school will make such decisions on a case-by-case basis, with the DSL taking a leading role. The school will take into consideration whether any action would prejudice an investigation and/or subsequent prosecution. The police and Children's Services will be consulted where necessary
- 1.261 the school will also consider whether circumstances make it unreasonable or irrational for the school to make a decision about what happened while an investigation is considering the same facts
- 1.262 disciplinary action and support can take place at the same time
- 1.263 the school will be clear whether action taken is disciplinary, supportive or both
- 1.264 shared classes
- 1.265 once the DSL has decided to progress a report, they will again consider whether the victim and alleged perpetrator will be separated in classes, on school premises and on school transport – balancing the school's duty to educate against its duty to safeguard. The best interests of the student will always come first
- 1.266 where there is a criminal investigation into rape or assault by penetration, the alleged perpetrator will be removed from classes with the victim and potential contact on school premises and transport will be prevented
- 1.267 where a criminal investigation into rape or assault by penetration leads to a conviction or caution, in all but the most exceptional circumstances, this will constitute a serious breach of discipline and result in the view that allowing the perpetrator to remain in the school would harm the education or welfare of the victim and potentially other students.
- 1.268 where a criminal investigation into sexual assault leads to a conviction or caution, the school will consider suitable sanctions and permanent exclusion. If the perpetrator will remain at the school, the school will keep the victim and perpetrator in separate classes and manage potential contact on school premises and transport. The nature of the conviction or caution, alongside the wishes of the victim, will inform any discussions made
- 1.269 where a report of sexual assault does not lead to a police investigation, this does not mean that the offence did not happen or that the victim has lied. Both the victim and alleged perpetrator will be affected and appropriate support will be provided. Considerations regarding sharing classes and potential contact will be made on a case-by-case basis
- 1.270 in all cases, the school will record its decisions and be able to justify them. The needs and wishes of the victim will always be at the heart of the process.

Working with parents and carers

- 1.271 in most sexual violence cases, the school will work with the parents/carers of both the victim and alleged perpetrator. For cases of sexual harassment, these decisions will be made on a case-by-case basis

- 1.272 the school will meet the victim's parents/carers with the victim present to discuss the arrangements being put in place to safeguard the victim and to understand their wishes in terms of support arrangements and the progression of the report
- 1.273 schools will also meet with the parents/carers of the alleged perpetrator to discuss arrangements that will impact their child, such as moving them out of classes with the victim. Reasons behind decisions will be explained and the support being made available will be discussed. The DSL or one of the Deputies will attend such meetings, with agencies invited as necessary
- 1.274 clear policies regarding how the school will handle reports of sexual violence and how victims and alleged perpetrators will be supported will be made available to parents/carers

Safeguarding other children

- 1.275 children who have witnessed sexual violence, especially rape and assault by penetration, will be provided with support
- 1.276 it is likely that children will "take sides" following a report and the school will do everything in its power to protect the victim, alleged perpetrator and witnesses from bullying and harassment
- 1.277 the school will keep in mind that contact may be made between the victim and alleged perpetrator and that harassment from friends of both parties could take place via social media and do everything in its power to prevent such activity
- 1.278 as part of the school's risk assessment following a report, transport arrangements will be considered, as it is a potentially vulnerable place for both a victim and alleged perpetrator. Schools will consider any additional support that can be put in place

Communication and confidentiality

- 1.279 all child protection and safeguarding concerns will be treated in the strictest of confidence in accordance with school data protection policies
- 1.280 where there is an allegation or incident of sexual abuse or violence, the victim is entitled to anonymity by law; therefore, the school will consult its policy and agree what information will be disclosed to staff and others, in particular the alleged perpetrator and their parents/carers
- 1.281 where a report of sexual violence or sexual harassment is progressing through the criminal justice system, the school will do all it can to protect the anonymity of the students involved in the case
- 1.282 concerns will only be reported to those necessary for its progression and reports will only be shared amongst staff members and with external agencies on a need-to-know basis
- 1.283 during disclosure of a concern by a student, staff members will not promise the student confidentiality and will ensure that they are aware of what information will be shared, with whom and why
- 1.284 where it is in the public interest, and protects students from harm, information can be lawfully shared without the victim's consent, e.g. if doing so would assist the prevention, detection or prosecution of a serious crime

- 1.285 before doing so, the DSL will weigh the victim's wishes against their duty to protect the victim and others
- 1.286 where a referral is made against the victim's wishes, it is done so carefully with the reasons for the referral explained to the victim and specialist support offered
- 1.287 depending on the nature of a concern, the DSL will discuss the concern with the parents/carers of the students involved
- 1.288 discussions with parents/carers will not take place where they could potentially put a student at risk of harm
- 1.289 discussion with the victim's parents/carers will relate to the arrangements being put in place to safeguard the victim, with the aim of understanding their wishes in terms of support arrangements and the progression of the report
- 1.290 discussion with the alleged perpetrator's parents/carers will have regard to the arrangements that will impact their child, such as moving classes, etc., with the reasons behind decisions being explained and the available support discussed
- 1.291 external agencies will be invited to these discussions where necessary
- 1.292 where confidentiality or anonymity has been breached, the school will implement the appropriate disciplinary procedures as necessary and will analyse how damage can be minimised and future breaches be prevented
- 1.293 where a student is leaving the school, the DSL will consider whether it is appropriate to share any information with the student's new provider, in addition to the child protection file, that will allow the new provider to support the student and arrange appropriate support for their arrival

Online safety

- 1.294 as part of a broad and balanced curriculum, all students will be made aware of online risks and taught how to stay safe online
- 1.295 through training, all staff members will be made aware of the following:
 - student attitudes and behaviours which may indicate they are at risk of potential harm online
 - the procedure to follow when they have a concern regarding a student's online activity
- 1.296 the school will ensure that suitable filtering systems are in place to prevent children accessing terrorist and extremist material, in accordance with the school's ICT Acceptable Use Policy
- 1.297 the use of mobile phones by staff and students is closely monitored by the school
- 1.298 the school will ensure that the use of filtering and monitoring systems does not cause "over blocking" which may lead to unreasonable restrictions as to what students can be taught regarding online teaching
- 1.299 further information regarding the school's approach to online safety can be found in the ICT Acceptable Use Policy

Mobile phone and camera safety

- 1.300 staff members will not use personal mobile phones or cameras when students are present
- 1.301 staff may use mobile phones on school premises outside of working hours when no students are present
- 1.302 staff may use mobile phones in the staffroom during breaks and non-contact time
- 1.303 mobile phones will be safely stored and in silent mode whilst students are present
- 1.304 staff will use their professional judgement in emergency situations
- 1.305 staff may take mobile phones on trips but they must only be used in emergencies and should not be used when students are present. Staff also have access to school mobile phones
- 1.306 mobile devices will not be used to take images or videos of students or staff in any circumstances
- 1.307 the sending of inappropriate messages or images from mobile devices is strictly prohibited
- 1.308 staff who do not adhere to this policy will face disciplinary action.
- 1.309 the ICT technicians will review and authorise any downloadable apps – no apps or programmes will be downloaded without express permission from an ICT technician or Headteacher
- 1.310 the school will adhere to the terms of the ICT Acceptable Use Policy and Acceptable Use Agreement at all times.
- 1.311 photographs and videos of students will be carefully planned before any activity with particular regard to consent and adhering to the school's Data Protection Policy
- 1.312 the DPO will oversee the planning of any events where photographs and videos will be taken
- 1.313 where photographs and videos will involve LAC students, adopted students or students for whom there are security concerns, the Headteacher/DSL will determine the steps involved
- 1.314 the DSL will, in known cases of a student who is a LAC or who has been adopted, liaise with the student's social worker, carers or adoptive parents to assess the needs and risks associated with the student
- 1.315 the school will adhere to its GDPR Policies at all times
- 1.316 staff will report any concerns about another staff member's use of mobile phones to the DSL, following the procedures outlined in the Child Protection and Safeguarding Policy and the London Borough of Tower Hamlets Procedures for allegations against staff in schools

Upskirting

- 1.317 under the Voyeurism (Offences) Act 2019, it is an offence to operate equipment and to record an image beneath a person's clothing without consent and with the intention of observing or enabling another person to observe, the victim's genitals or buttocks

(whether exposed or covered with underwear), in circumstances where their genitals, buttocks or underwear would not otherwise be visible, for a specified purpose

1.318 a “specified purpose” is namely:

- obtaining sexual gratification (either for themselves or for the person they are enabling to view the victim’s genitals, buttocks or underwear)
- to humiliate, distress or alarm the victim

1.319 “operating equipment” includes enabling, or securing, activation by another person without that person’s knowledge, e.g. a motion activated camera

1.320 upskirting will not be tolerated by the school

1.321 any incidents of upskirting will be reported to the DSL who will then decide on the next steps to take, which may include police involvement

Sports clubs and extracurricular activities

1.322 clubs and extracurricular activities hosted by external bodies, e.g. charities or companies, will work in collaboration with the school to effectively safeguard students and adhere to local safeguarding arrangements

1.323 paid and volunteer staff running sports clubs and extracurricular activities are aware of their safeguarding responsibilities and promote the welfare of students

1.324 paid and volunteer staff understand how they should respond to child protection concerns and how to make a referral to Children’s Services or the police, if necessary.

1.325 all national Governing Bodies of sport that receive funding from either Sport England or UK Sport, must aim to meet the Standards for Safeguarding and Protecting Children in Sport.

Safer recruitment

1.326 an enhanced DBS check with barred list information will be undertaken for all staff members engaged in regulated activity. A person will be considered to be in ‘regulated activity’ if, as a result of their work, they:

- are responsible on a daily basis for the care or supervision of children
- regularly work in the school at times when children are on the premises
- regularly come into contact with children under 18 years of age

1.327 the DfE’s DBS Workforce Guides will be consulted when determining whether a position fits the child workforce criteria

Pre-employment checks

1.328 the Governing Body will delegate responsibility to the School Business Manager for acquiring documents to ensure the suitability of prospective employees by:

- verifying the candidate’s identity, preferably from the most current photographic ID and proof of address except where, for exceptional reasons, none is available
- obtaining a certificate for an enhanced DBS check with barred list information where the person will be engaged in regulated activity

- obtaining a separate barred list check if an individual will start work in regulated activity before the DBS certificate is available
- checking that a candidate to be employed as a teacher is not subject to a prohibition order issued by the Secretary of State, using the TRA Teacher Services' System
- verifying the candidate's mental and physical fitness to undertake their working responsibilities, including asking relevant questions about disability and health to establish whether they have the physical and mental capacity for the specific role
- checking the person's right to work in the UK. If there is uncertainty about whether an individual needs permission to work in the UK, the advice set out on the [Gov.UK](https://www.gov.uk) website will be followed.
- if the person has lived or worked outside the UK, making any further checks that the school considers appropriate; this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has impose.
- checking professional experience, QTS and qualifications as appropriate using Teacher Services

1.329 an Enhanced DBS certificate will be obtained from candidates before or as soon as practicable after appointment. An online update check may be undertaken through the DBS update service if an applicant has subscribed to it and gives their permission

Internal candidates

1.330 references from internal candidates will always be scrutinised before appointment

Governors

1.331 an Enhanced DBS check will be carried out for each member of the Governing Body

1.332 where a Governor also engages in any regulated activity, a barred list check will also be requested

1.333 [\[Strongly recommended but not a legal requirement\]](#) The school will carry out a section 128 check on Governors, because a person subject to one is disqualified from being a Governor. The school will check if a proposed Governor is barred due to a section 128 order by contacting the TRA using the Teacher Services' webpage

Those who have lived or worked outside of the UK

1.334 for those who have lived or worked outside of the UK, additional checks regarding teacher sanctions or restrictions will be conducted, this includes checking for any teacher sanctions or restrictions that an EEA professional regulating authority has imposed

Barred List Check

1.335 an Enhanced DBS check may be requested for anyone working in a school that is not in regulated activity but does not have a barred list check

1.336 if there are concerns about an applicant, an Enhanced DBS check with barred list information may be requested, even if they have worked in regulated activity in the three months prior to appointment

- 1.337 written information about their previous employment history will be obtained from candidates and the appropriate checks undertaken to ensure information is not contradictory or incomplete

References

- 1.338 references will be obtained directly from referees and scrutinised, with all concerns satisfactorily resolved prior to confirmation of employment
- 1.339 references will only be accepted from a senior person and not from a colleague. This person must have the authority to write a reference on behalf of the school/organisation, etc
- 1.340 references will be sought on all short-listed candidates, including internal ones, before an interview and checked on receipt to ensure that all specific questions were answered satisfactorily
- 1.341 references will be obtained prior to interviews taking place and discussed during interviews
- 1.342 open testimonials will not be considered
- 1.343 information about past disciplinary actions or allegations will be considered carefully when assessing an applicant's suitability for a post
- 1.344 information sourced directly from a candidate or online source will be carefully vetted to ensure they originate from a credible source

Volunteers

- 1.345 no volunteer will be left unsupervised with a student or allowed to work in regulated activity until the necessary checks have been obtained
- 1.346 an Enhanced DBS certificate with barred list check will be obtained for all new volunteers in regulated activity that will regularly teach or look after children on an unsupervised basis or provide personal care on a one-off basis
- 1.347 personal care includes helping a child with eating and drinking for reasons of illness, or care in connection with toileting, washing, bathing and dressing for reasons of age, illness or disability
- 1.348 a supervised volunteer who regularly teaches or looks after children is not in regulated activity
- 1.349 the school will obtain an Enhanced DBS certificate with barred list check for existing volunteers that provide pastoral care
- 1.350 unless there is cause for concern, the school will not request any new DBS certificates with barred list check for existing volunteers that have already been checked
- 1.351 a risk assessment will be undertaken for volunteers not engaged in regulated activity when deciding whether to seek an enhanced DBS check

Associate members of the Governing Body

- 1.352 associate members (i.e. individuals that are appointed by the Governing Body to serve on one or more committees) will not be required to obtain enhanced DBS checks

Contractors

- 1.353 the school will ensure that any contractor or employee of the contractor working on the premises has been subject to the appropriate level of DBS check or is supervised at all times. Where possible, work will be undertaken during the school holidays
- 1.354 checks will be conducted to ensure that the contractor presenting themselves for work is the same person on whom the checks have been made.
- 1.355 contractors without a DBS check will be supervised if they will have contact with children. The identity of the contractor will be checked upon their arrival at the school

Data Retention

- 1.356 DBS certificates will be securely destroyed as soon as practicable but not retained for longer than six months from receipt
- 1.357 a copy of the other documents used to verify the successful candidate's identity, right to work and required qualifications will be kept for the personnel file. The personnel file will be held for the duration of the employee's employment plus six years

Referral to the DBS

- 1.358 the school will refer to the DBS anyone who has harmed a child or poses a risk of harm to a child or if there is reason to believe the member of staff has committed an offence and has been removed from working in regulated activity. The duty will also apply in circumstances where an individual is deployed to another area of work that is not in regulated activity or they are suspended

Ongoing suitability

- 1.359 following appointment, consideration will be given to staff and volunteers' ongoing suitability – to prevent the opportunity for harm to children or placing children at risk

Single Central Record (SCR)

- 1.360 the school keeps an SCR which records all staff, including supply staff and teacher trainees on salaried routes, who work at the school
- 1.361 the following information is recorded on the SCR:
- an identity check
 - a barred list check
 - an enhanced DBS check
 - prohibition from teaching check
 - a check of professional qualifications
 - a check to determine the individual's right to work in the UK
 - additional checks for those who have lived or worked outside of the UK
- 1.362 for agency and third-party supply staff, the school will also record whether written confirmation from the employment business supplying the member of staff has been received which indicates that all the necessary checks have been conducted and the date that confirmation was received
- 1.363 if any checks have been conducted for volunteers, this will also be recorded on the SCR

1.364 if risk assessments are conducted to assess whether a volunteer should be subject to an enhanced DBS check, the risk assessment will be recorded

Training

1.365 staff members will undergo safeguarding and child protection training at Induction, which will be regularly updated or whenever there is a change in legislation

1.366 the Induction training will cover:

- Safeguarding & the Protection of Children Policy
- the Behaviour Policy
- the staff Code of Conduct
- the safeguarding response to children who go missing from education
- the identity of the DSL and any deputies
- the role of the DSL and deputy DSLs

1.367 all staff members will also receive regular safeguarding and child protection training

1.368 training will cover, at a minimum:

- signs and symptoms of abuse
- who to contact when a student has been harmed or is at risk of being harmed
- prevent duty/radicalisation/extreme ideology
- whistleblowing
- the issues surrounding sexual violence and sexual harassment
- contextual safeguarding
- child criminal exploitation and the need to refer cases to the National Referral Mechanism

1.369 staff will receive opportunities to contribute towards and inform the safeguarding arrangements in the school

1.370 the DSL and Deputy DSLs will undergo updated child protection training every two years, as well as additional training to refresh their skills and knowledge at regular intervals (at least annually) to allow them to keep up-to-date with any developments relevant to their role

1.371 the DSL and Deputy DSLs will also undergo biennial Prevent awareness training which will enable them to understand and support the school with regards to the Prevent duty and equip them with the knowledge needed to advise staff

1.372 the DSL and his deputy(s) will undergo online safety training to help them recognise the additional risks that students with SEND face online, for example, from online bullying, grooming and radicalisation, to ensure they have the capability to support students with SEND to stay safe online

1.373 online training will also be conducted for all staff members as part of the overall safeguarding approach.

Monitoring and review

1.374 this policy is reviewed annually by the school's Governing Body

- 1.375 any changes made to this policy by the Governing Body will be communicated to all members of staff
- 1.376 all members of staff are required to familiarise themselves with all processes and procedures outlined in this policy as part of their induction programme
- 1.377 the next scheduled review date for this policy is October 2020.

Safeguarding During the Coronavirus (COVID-19) Outbreak

This appendix has been created in line with the DfE's 'Coronavirus (COVID-19) and will appear, for the duration of this pandemic, as an appendix to the school's Safeguarding & the Protection of Children Policy

Statement of intent

Bowden House School understands that it faces a time of great uncertainty and as a school, will do all it can to provide clarity and safety to the school community. This appendix includes provisions which we will have due regard for during the coronavirus pandemic. The information in this section is under constant review and is updated to reflect changes to government guidance as it is released.

1. Key definitions

1.1 For the purpose of this policy, the following definitions will be utilised:

- **Education hub:** a cluster of schools and colleges collaborating and sharing resources, staff and students in a local area
- **Children of keyworkers:** children of parents/carers who work in the following industries:
 - Health and social care, e.g. doctors and nurses
 - Education and childcare, e.g. teachers and DSLs
 - Local and national government, e.g. administrative occupations
 - Food and essential goods retail, e.g. supermarket workers and grocers
 - Public safety and national security, e.g. police and ministry of defence workers
 - Transport, e.g. freight transport workers and train drivers
 - Utilities, communication and financial services, e.g. bankers, oil workers, and telecommunications (999 and 111 critical services)
- **Vulnerable children:** those who have a social worker and those with EHC plans. Those who have a social worker include children who have a child protection plan and those who are looked after by the LA. A child may also be deemed to be vulnerable if they have been assessed as being in need or otherwise meet the definition in section 17 of the Children Act 1989

2. The role of the DSL and his Deputies

2.1 in light of the current crisis, our school will have additional measures in place to ensure the safety and wellbeing of its students – this approach is led by the DSL (Headteacher)

2.2 During partial school closure, the DSL and his Deputies are responsible for:

- ensuring they or his Deputies are available at all times, either in school or via telephone or online
- sharing their time and resources with other schools, where applicable
- being responsible for amending Appendix A (this section) in line with the continual changes to education policy released by the DfE and communicating all changes to staff
- identifying vulnerable children and communicating additional safeguarding provisions to students and their families/carers
- ensuring students that are attending another school (as part of the hub approach) have the required support and communicating the student's additional needs with the other school's DSL – [this is unlikely with our students at the moment but if the situation changes, it may be a consideration](#)
- working with the VSH and wider LA to protect vulnerable children
- ensuring staff are aware of reporting channels for safeguarding concerns ([see attached flowchart](#))
- sharing their contact information with the school community, if applicable
- ensuring there is a consistent approach to safeguarding children throughout the coronavirus pandemic
- providing students with clear communication channels so they can report any concerns they have, including reports of peer-on-peer abuse
- ensuring any student who is not formally considered as vulnerable but who may still be vulnerable, has access to school where required
- identifying a suitable member of the SLT to assume the role of temporary DSL should both the DSL and his Deputies become unable to work
- adhering to safer recruitment procedures

2.3 the DSL will report back to the Governing Body on all relevant safeguarding concerns experienced during partial school closure

2.4 the DSL will work with the local safeguarding partners to ensure students remain safe during partial school closure

3. Attendance

3.1 the school will no longer use its regular attendance register to record attendance during partial school closure

3.2 the school will report to the DfE the number of students in school and whether they remain partially closed using [the online form](#). This form will be submitted by 12:00pm each weekday

- 3.3 the school will record and investigate any absences where it expects a child to attend school and who did not or where parents/carers have arranged care for their child who subsequently did not attend
- 3.4 measures are in place, in line with 2.2 of this appendix, to ensure students attending a different school are in a safe environment. For LAC, any change will be organised and monitored by the VSH (if applicable)
- 3.5 the DSL makes a student's temporary school aware of the reason why they are vulnerable (where relevant) and ensures the temporary school has access to the student's EHC plan and other supporting documents – (this may only be applicable if a student is awaiting admission to Bowden House School)
- 3.6 the school will not prevent the transfer of safeguarding data to a student's temporary school, yet, it will always have due regard for data protection legislation during the transfer of information.

4. Staff training and safeguarding induction

- 4.1 the school will ensure that all existing school staff have read part one of 'Keeping Children Safe in Education' (KCSIE - 2019) and are suitably trained in this policy and any local safeguarding arrangements
- 4.2 the school will follow safer recruitment processes, in line with the relevant policy, when recruiting new staff
- 4.3 anyone who has not undergone suitable DBS checks will not be left unattended with students
- 4.4 the school will report anyone to the TRA who is considered to be a safeguarding risk by emailing Misconduct.Teacher@education.gov.uk – all referrals received by the TRA will continue to be considered
- 4.5 the school will have a rota system which allows the Headteacher to be aware of who will be in school at any one given time
- 4.6 the school will keep a record of each record of attendance for staff and students within school and any additional risk assessments made on staff in a secure file, e.g. the SCR

Online safety and security

- 4.7 all online programmes used will be checked by the school's DPO and DSL to ensure they are reputable and GDPR compliant
- 4.8 the ICT technician will work to ensure any loaned devices are secure and have the necessary antivirus malware protection downloaded.
- 4.9 any online queries which require the ICT technician/ICT teacher will be addressed over the phone or online as much as possible – face-to-face contact is kept to a minimum
- 4.10 the DSL will report back to the Governing Body how they are ensuring students remain safe online during partial/full school closure

- 4.11 students will report any suspicious online activity they encounter to the DSL (Headteacher) or one of the Deputy DSLs
- 4.12 staff will adhere to the school's Code of Conduct and the ICT Acceptable Use Agreement at all times when delivering education online
- 4.13 staff will report concerns over a student's safety online to the DSL
- 4.14 the school will collaborate with parents/carers to reinforce the importance of online safety.

5. Mental Health

- 5.1 the school understands how the coronavirus pandemic can cause students and staff to feel anxious and concerned and will offer any essential support required to those in need
- 5.2 the Headteacher will encourage line managers to hold one-to-one meetings with their staff over the phone or via a video call to ensure they feel supported during this stressful time. At Bowden House School, this will include the CAMHS practitioner
- 5.3 students will be provided with different resources they can access to help them cope with their mental health – including ChildLine and other online services as well as printed information from school about how to keep themselves safe on-line
- 5.4 face-to-face support will only be provided where necessary or unavoidable
- 5.5 the school will have due regard in identifying and responding to early signs of mental health issues in our students

6. Supporting students at home

- 6.1 the DSL will ensure every student has their contact information so they know how they can talk to them about any safeguarding concerns
- 6.2 students are provided with online safety information by their teacher/mentor
- 6.3 students will be directed to practical online support, such as ChildLine, where they feel unsafe and require support outside of school. However, the staff of the school will be in frequent contact offering advice and support as well as the teaching and learning programme
- 6.4 parents/carers are given a list of websites their child will be accessing and any information of online sessions with staff their child will be participating in during partial/full school closure
- 6.5 parents are provided with the contact details of the DSL so they can report any concerns they have.

7. Peer-on-peer abuse

- 7.1 the DSL will implement robust reporting procedures for peer-on-peer abuse during partial/full school closure and communicate these to all staff, students and parents/carers
- 7.2 reports made regarding peer-on-peer abuse will be risk assessed by the DSL on a case-by-case basis and where required, investigated immediately and reported to the relevant authority, e.g. Local Safeguarding Partners or the Police, where required
- 7.3 both the alleged perpetrator and victim will be provided with support whilst the report is being investigated
- 7.4 students will be provided with the contact details of relevant bodies who can provide support to them during this time, e.g. ChildLine or members of the school team
- 7.5 the DSL will keep the victim, the alleged perpetrator and their families/carers up-to-date where necessary with details of the investigation, including the conclusion and how appeals can be made
- 7.6 individuals will be given a copy of the school's amended Complaints Procedures Policy to assist them with the appeals process
- 7.7 communications will be made online or by telephone, unless face-to-face contact is unavoidable.

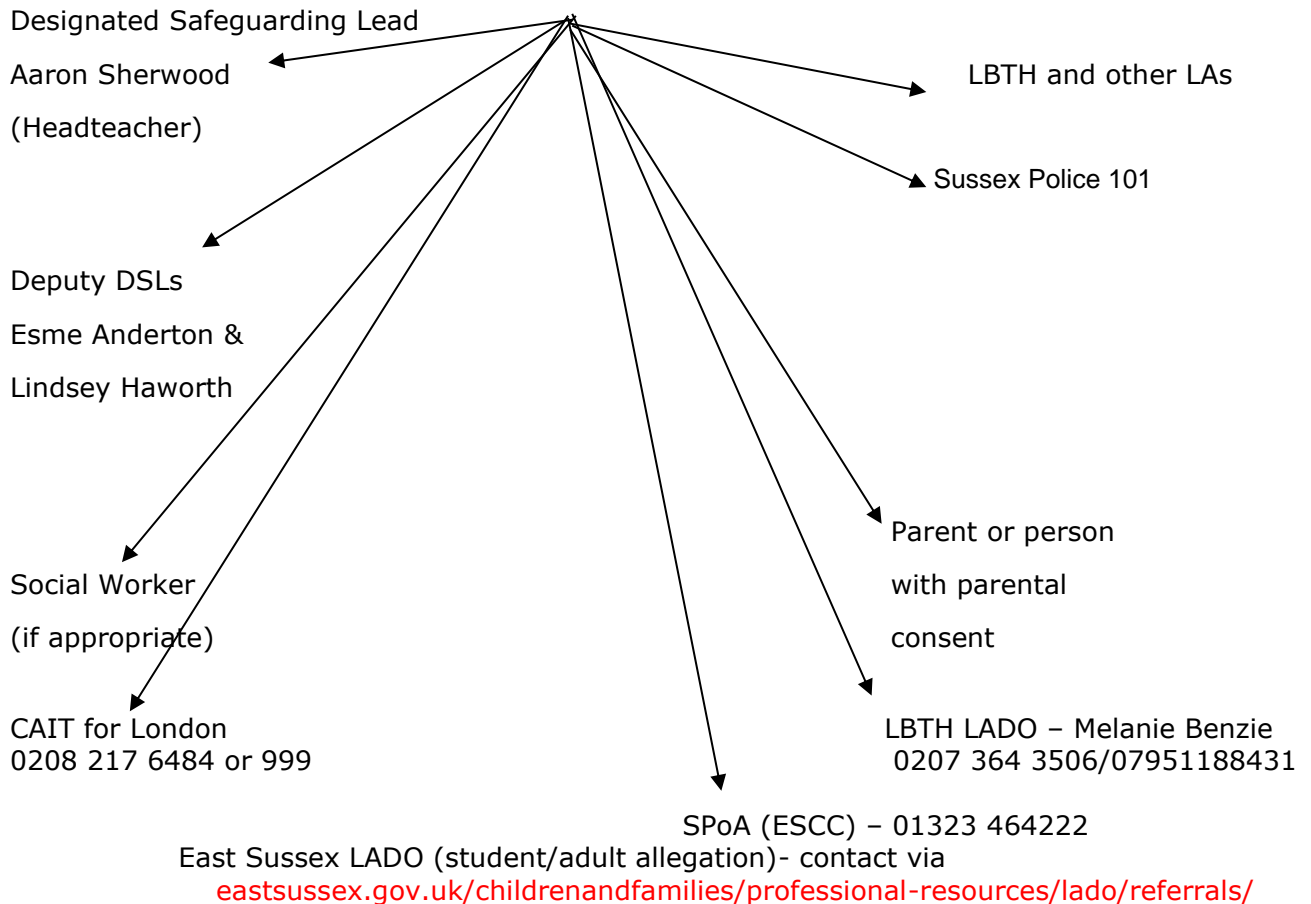
8. Monitoring and review

- 8.1 the DSL is responsible for continually monitoring DfE updates and updating this appendix in line with any government changes and guidance from the Local Safeguarding Partners
- 8.2 any changes to this appendix will be communicated to all staff and parents/carers

Safeguarding and the Protection of Children Flow Chart

Child Protection Issue

(depending upon the nature of the concern, some or all of these contacts should be alerted)



LBTH Child Protection Advice Line

020 7364 3444

Out of Hours 0207 364 5006 (option 3)

Record on:

Significant
Conversation Form (BehaviourWatch)

Safeguarding Book and BehaviourWatch

Designated Safeguarding Lead or Deputy Designated Safeguarding Leads to refer to and carry out Local Safeguarding Partners Procedures. Under Keeping Children Safe in Education, 2019 all staff have a duty to keep our students safe and can make a referral to any of the above – ESCC Single Point of Advice (SPoA) will take phone referrals and advise on further action/contacts.

Contacts and Advice

Expert organisations

- [Barnardo's](#)
- [Lucy Faithfull Foundation](#)
- [NSPCC](#)
- [Rape Crisis](#)
- [University of Bedfordshire: Contextual Safeguarding](#)
- [UK Safer Internet Centre](#)

Support for victims

- [Anti-Bullying Alliance](#)
- [MoJ Victim Support](#)
- [Rape Crisis](#)
- [The Survivor's Trust](#)
- [Victim Support](#)

Toolkits

- [Brook](#)
- [NSPCC](#)
- [Safeguarding Unit, Farrer and Co, and Carlene Firmin, MBE, University of Bedfordshire](#)

Further information on confidentiality and information sharing

- [NSPCC: Things to Know and Consider](#)

Further information on sexting

- [UK Council for Child Internet Safety: Sexting Advice](#)
- [London Grid for Learning – Collection of Advice](#)

Support for parents

- [Parentzone](#)
- [Parentsafe – London Grid for Learning](#)
- [CEOP Thinkuknow – Challenging Harmful Sexual Attitudes and their Impact](#)
- [CEOP Thinkuknow – Supporting Positive Sexual Behaviour](#)

